

PROPOSAL
RFI 163-0410261GB

Charlotte-Mecklenburg Schools

Compliance Assessment Services

April 24, 2026

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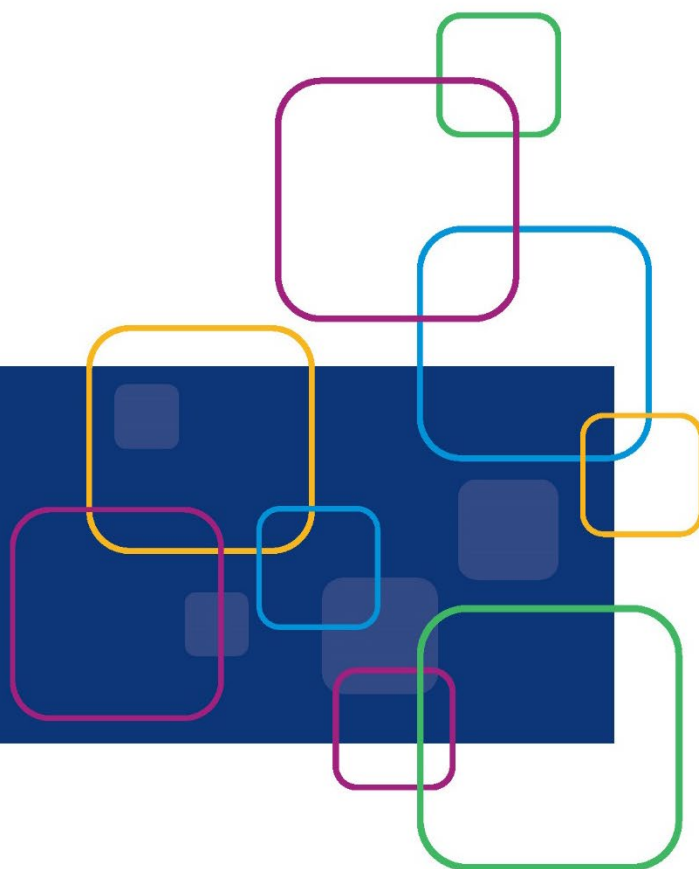


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COVER LETTER

April 24, 2026
Charlotte-Mecklenburg Board of Education
ATTN: Anna Hehenberger
P.O Box 30035, Charlotte, NC, 28230-0035



Dear Ms. Hehenberger,

Public Consulting Group, LLC (PCG) is pleased to submit this proposal in response to RFI No. 163-0410261GB for *Compliance Assessment Services*, issued by the Charlotte-Mecklenburg Board of Education. We understand that CMS seeks a partner with the expertise to conduct a compliance assessment of the District's implementation of applicable federal and state legal requirements.

PCG was founded on a corporate mission of "Solutions that Matter," and today we are one of the largest firms in the nation devoted to providing services to government and educational agencies. PCG has deep experience analyzing policies and business processes to identify efficiencies and improvements in the public sector. We understand the issues that public sector organizations face and work closely with our client partners to use data to improve programs and outcomes. For 40 years, our firm has consistently grown in both the number of clients we serve and the number of students whose lives we positively impact. PCG is also deeply committed to and embedded in North Carolina public schools, having operated in the state and maintained a long-standing partnership with CMS since 1994. This sustained presence has provided PCG with a strong understanding of North Carolina's education system, state-specific compliance requirements, and district-level implementation considerations.

Through our local connection, national perspective, content expertise, and proven project management structures, our team is uniquely situated to best serve CMS in this work.

- **PCG's Local Connection** serves as the keystone for this project and all others. We have worked with a wide variety of districts and state agencies on numerous projects in North Carolina for over three decades, allowing us to build a deep understanding of North Carolina educators, leaders, and students. In addition to this, our dedicated State Advisor resides in North Carolina, and we have a multitude of professionals who live and work in Charlotte with children attending CMS schools.
- **PCG's National Perspective** ensures that our work is relevant within the national landscape and continually aligned with industry best practices. We have developed an extensive knowledge of systems, policies, and structures across thousands of clients, allowing us a lens that is comprehensive in both width and depth.
- **PCG's Content Expertise** stems from a diversified team with subject matter experience encompassing standard operational processes, process improvement, financial analysis, stakeholder engagement strategies, and comprehensive audits. This enables us to provide a thorough examination with recommendations that are technical, actionable, and sustainable.
- **PCG's Project Management Structures** mean that we always provide the highest quality deliverables on time and within budget. Our communication is consistent and effective with a project plan rooted in collaboration and transparency.

PCG is committed to providing CMS with objective and comprehensive findings and recommendations to ensure that CMS policies and practices align with applicable legal and regulatory requirements. We look forward to the opportunity to perform this important work in partnership with the Charlotte-Mecklenburg Board of Education. If you have any questions, please do not hesitate to contact Anna d'Entremont at adentremont@pcgus.com or 617-320-6516.

Sincerely,

A handwritten signature in blue ink that reads "Anna d'Entremont".

Anna d'Entremont, Manager
Public Consulting Group LLC

COMPANY OVERVIEW & RELEVANT EXPERIENCE

PCG's History

As a leading education consulting firm for **40 years**, PCG brings national expertise and proven strategies to inform assessments and recommendations. With **more than 2,000 professionals** worldwide, our firm has approximately **1,000 active contracts** at any given time. We currently serve 38 state departments of education and 17 of the 20 largest urban school districts. Our commitment to clients and high ethical standards is reflected in our long history of success helping state agencies strategically plan for and implement complex policy initiatives.

Our firm is structured into four designated Practice Areas, each with deep domain expertise and specialized professionals. PCG often collaborates across Practice Areas, combining vast resources to offer clients a multidisciplinary approach to solving their communities' toughest challenges.

PCG's Practice Areas

Education. Consulting services that help schools, districts, and state education agencies improve programs and processes, optimize financial resources, and improve outcomes for students and teachers.

Health. Wide array of consulting services and technologies to help state and local health agencies operate more efficiently and improve service to the populations they serve.

Human Services. In-depth programmatic knowledge and regulatory expertise to help state and municipal agencies expand program financing options from public and private sources, reduce or contain costs, improve business processes, and promote improved client outcomes.

Technology Consulting. Full spectrum of Information Technology (IT) consulting services to help state and local governments navigate the complete IT lifecycle: from project inception, feasibility, and procurement through to design, implementation, and maintenance and operation.

Within this structure, our firm has developed a vast range of resources to support clients. Our approach is never siloed; we frequently collaborate across Practice Areas, drawing on multiple teams and specialists to ensure a multidisciplinary approach at every step.

This depth of expertise is seen not just at the firm level but also within the Education Strategies team. While we have eight designated Key Personnel for this project, we also offer a deep bench of professionals who provide thought partnership and targeted support throughout the project scope to ensure the highest quality of work and to minimize potential delays. They will be called on as needed at no additional cost.

Every aspect of our work and approach is informed by research and national experience that is simultaneously tailored to the local context and specific strategic priorities. PCG's priority in each of our projects is to ensure accuracy and thoroughness, producing relevant, impactful, and actionable recommendations. We provide "Solutions that Matter."

Experience in North Carolina & with CMS

For over 30 years, PCG has provided innovative, customized solutions to enhance organizational performance, professional development, financial optimization, and student outcomes in North Carolina. We currently partner with over 150 districts and charter schools throughout the state, providing integrated tools within the ECATS (Every Child Accountability & Tracking System) platform that address diverse needs. With 140 professionals based full-time in North Carolina, and a regional office in Charlotte, our firm has the local experience and perspective paired with the national expertise that allows us to seamlessly tailor solutions and best practices to the CMS community.

PCG's partnership with CMS began with School-Based Medicaid support in 1994 and expanded in 2006 to include EDPlan-related solutions and services. In recent years, CMS and PCG have broadened the partnership to advance the District's commitment to a "Whole Child" approach. This work leverages an integrated set of tools and services that support how CMS identifies needs, documents and coordinates supports, and strengthens consistency of practice across schools.

Current CMS contracts include Playbook, a personalized professional learning and coaching platform utilized by the Exceptional Children (EC) department. The work includes configuration and training, ongoing resource updates, and reporting aligned to district goals. Playbook also extends to the classroom, where the EC department is utilizing Transition Playbook to support transition-planning and curricular activities for students with disabilities. CMS and PCG are also actively developing social-emotional learning (SEL) and mental health curriculum to integrate into Transition Playbook. This effort includes a targeted inventory/needs assessment and development of student-facing lessons, paired with ongoing virtual training to support implementation.

In addition to these active efforts, CMS's broader PCG-supported scope includes technology-enabled capabilities that strengthen student support planning and documentation. This includes support for Exceptional Children, Section 504, and Gifted documentation management and reporting. It also supports behavior and safety documentation and reporting, intervention tracking, and related workflows that help teams implement supports consistently and reliably.

PCG is also the selected partner for the North Carolina Department of Public Instruction's (NCDPI) electronic data management system, ECATS, the statewide exceptional children platform used across North Carolina public school units to support alignment with applicable federal and state requirements. ECATS currently includes two integrated modules: Special Education and Service Documentation. The platform is purpose-built and NC-customized to support compliant special education practice and reporting, including workflow-based process guidance and compliance supports, and a secure service documentation capability that enables districts to document service delivery and related requirements in a FERPA-aligned environment. ECATS serves as the "source of truth" for NCDPI's federal and state reporting, informing IDEA compliance indicators and funding decisions.

PCG is a trusted, experienced, and vetted partner of North Carolina educational organizations with an extensive understanding of the educational and financial landscape of CMS.

Relevant Project Experience & Expertise

PCG has partnered with many state education agencies and districts to support high impact, high-profile assessments, policy analyses, and change management initiatives. This work has included redesigning funding formulas, analyzing whether state funds were achieving their intended impact, and auditing organizational policies and procedures. Our experience working with state education agencies and large school districts has made us acutely aware of the constraints often placed on public agencies. We have consistently applied our expertise to support clients in maximizing resources, ensuring better management decisions using performance measurement techniques, streamlining business processes and staffing procedures, improving federal and state compliance, and improving student outcomes. We deeply understand the necessary inputs that help our education clients thrive.

Below is a selection of recent projects that illustrate PCG's experience partnering with states and districts to solve challenging policy problems.

Audit of Jefferson County Public Schools, Kentucky Auditor of Public Accounts. Under the Kentucky Auditor of Public Accounts, PCG is providing education subject matter expertise to support a comprehensive special examination of Jefferson County Public Schools. The examination was requested by the state legislature. PCG is reviewing District policy and procedure compliance with federal and state regulations, particularly in the areas of finance, human resources, Board of Education, and special education. To date, PCG has conducted **over 115 interviews and focus groups**, in addition to **30 school visits**. Stakeholders interviewed included Board members, cabinet leaders, and other key staff. PCG distributed comprehensive surveys to district staff, students, and community members that yielded **over 26,000 responses**. The work also consists of reviewing data and documents, conducting comparison

district research, and analyzing data related to student outcomes, financials, and human resources. Recommendations will include updates to policies and procedures for compliance and transparency.

Operational Review, Atlanta Public Schools, GA. PCG conducted an operational review of low-incidence programming and transportation for the Atlanta Public Schools to improve the district's 5-year master facilities plan and ensure access to high-quality instruction for students with disabilities as close to their neighborhood school as possible.

Operational & Management Review & Mill Levy Override Spend Plan Review, Colorado Springs School District 11, CO. D11 contracted PCG to conduct an Operational and Management Review of three key departments (Human Resources, Facilities, and Information Technology). PCG provided an independent, objective third-party review of the core functions and activities within these departments to determine where D11 should focus on changes to increase the efficiency and effectiveness of its services.

In 2025, PCG conducted a follow-up review of D11's Facilities department to determine the extent to which progress had been made. This work included conducting **focus groups and interviews** in both English and Spanish as well as developing and distributing a **survey** to gather data on staff's perceptions of the efficacy and culture of the Facilities department. PCG additionally conducted an **analysis of the department's fiscal model and expenditures**. PCG is now supporting the development of an **overall strategy to drive implementation of recommended changes and improve cost-efficiency**.

PCG also performed an assessment of the Mill Levy Override (MLO) Spend Plan in 2016, 2019, 2022, and presently in 2026. The goal of the review was to report on the District's progress toward its goals since the last audit, assess the effectiveness and the alignment between components of the districts plans and priorities (Strategic Plan, Technology Plan, Academic Plan, Facilities Plan, Unified Improvement Plan, etc.), and assess how District programs had impacted student outcomes. PCG delivered a report and board presentation that recommended strategies for the District to better allocate resources.

"PCG did an amazing job of reviewing the District's Mill Levy Override program for each of the last 2 years. I found the PCG staff to be very knowledgeable of the K-12 profession and offered a valuable external perspective of our program. I also felt that the PCG staff were very accommodating of our needs... which says so much about the character and integrity of the PCG staff."

-Glenn E. Gustafson,
Former Deputy Superintendent of D11

Study of the Fiscal Efficacy & Organizational Structures to Support Outcomes for Students with Disabilities, Los Angeles Unified School District, CA. On behalf of Los Angeles Unified School District, PCG also conducted a Study of the Fiscal Efficacy and Organizational Structures to Support Outcomes for Students with Disabilities. This consisted of a comprehensive review of the district's special education program focused on improving services and outcomes for students with disabilities and identifying efficiencies/cost savings. At the time, LAUSD was under a Modified Consent Decree (MCD) for special education and had just developed a Master Plan for English Learners (ELs), created to resolve issues related to the U.S. Department of Education's Office for Civil Rights (OCR) report. The district also had recently passed a ban on suspensions to address the longstanding history of disproportionate discipline practices for African American male students and started implementing Positive Behavior Support and Restorative Justice. As part of the special education review and subsequent action planning, PCG worked with LAUSD to align these plans and to lay the foundation for eventual release from the MCD.

Comprehensive Access & Opportunity Audit, Dekalb County School District, GA. PCG was hired to conduct a Comprehensive Access and Opportunity Audit to improve educational outcomes through the creation of equitable policies, practices and experiences for all members of the school community. PCG focused on Organizational Leadership and Policy, Family and Community Engagement, Instructional and Programmatic Equity, Resource Allocation, School Climate, and Professional Learning. PCG's work included significant stakeholder engagement, including focus groups, interviews, and a survey that received

over 23,000 responses. The final deliverables included a report and recommendations roadmap, summary presentation, equity action plan, monitoring and evaluation framework and an equity policy.

Culture & Climate Study and HR Classification Process Redesign, Clark County School District, NV.

In 2023, PCG was hired by CCSD to conduct a Culture and Climate Study to investigate and analyze how District leadership and Board of Trustees practices impact the overall culture of the District and identify opportunities for improved practice. The goal was to improve the overall transparency of and trust in CCSD. There was a substantial stakeholder perception data collection component to this project, including **38 stakeholder focus groups** and a districtwide staff survey in spring 2023, all contributing to the creation of a comprehensive action plan. Focus groups included families, students and community members. The staff **survey received over 11,700 responses.** CCSD hired PCG to continue to support district-wide survey administration in spring 2024 and received a similar response rate. CCSD opted to augment the initial scope and extend the contract to engage PCG as an implementation and monitoring partner.

PCG also partnered with CCSD to conduct a Staffing Practices Audit to better understand the current staffing model and structures within the Central Office. The goal of this audit was to identify internal redundancies and to ensure the Central Office is appropriately structured to support CCSD's strategic priorities. PCG performed a staffing analysis analyzing staffing allocations, organizational structure, and classification and reclassification processes for the District's Central Services. PCG analyzed comparison district structures, utilized district-wide survey data to understand staff perception, and held stakeholder engagement sessions to understand processes. A final report was delivered to the district in spring 2024.

CCSD reengaged with PCG in fall 2025 to conduct a redesign of the classification process. In this engagement, PCG conducted interviews, focus groups, and job shadowing to inform a new classification process that is consistent and transparent. PCG's deliverables included a classification process guide and rubrics; a classification audit protocol; a job description audit and revision protocol; an implementation roadmap; communication templates; and a final summary for the Board of School Trustees.

Special Education Costs Analysis, NOLA Public Schools, LA. PCG was contracted to conduct a fiscal analysis of special education costs across charter schools and organizations to inform potential consolidation efforts in NOLA Public Schools. PCG analyzed demographic data from the District Level Funding Allocation for 58 sites to assess student population trends, conducted a stratified sampling process to analyze staffing and caseload data for five large CMOs, three small CMOs, and seven single sites, analyzed Annual Financial Reports for 57 sites, or approximately 80 percent, of all charter schools, and analyzed documents and guidance related to financial reporting, including accounting code descriptions, differentiated funding reports, and other general information about special education funding in the district. A final report was provided to the client summarizing per-pupil expenditure cost for supporting students with disabilities along with recommendations for improvements to financial reporting, streamlining CMO data collection, and areas for deeper analysis.

Organizational Review of Lakewood Public School District, New Jersey Department of Education.

PCG conducted a comprehensive organizational and financial review of Lakewood Public School District on behalf of the New Jersey Department of Education pursuant to an executive order issued by the State's Acting Commissioner. The purpose of the review was to evaluate whether the district was meeting the State's constitutional requirement to provide a *thorough and efficient* education and appropriately implementing the School Funding Reform Act (SFRA).

The central focus of PCG's work was a detailed examination of district financial management and use of public funds, conducted in the context of ongoing litigation assessing whether SFRA was unconstitutional as applied to Lakewood. PCG analyzed how state, federal, and local resources were allocated and expended across major operational domains, with particular attention to alignment between expenditures, statutory requirements, and student needs. PCG's analysis spanned five interrelated domains (Finance, Transportation, Curriculum and Instruction, Governance, and Special Education) with appropriate use of funds assessed within each area. Financial review activities included examination of district budgets, spending patterns, cost drivers, and fiscal decision-making structures, as well as cross-domain analysis to understand how financial practices influenced educational programming, transportation services, governance effectiveness, and delivery of special education.

Given Lakewood's unique fiscal and demographic context, including significant nonpublic school obligations and associated financial strain, PCG's work considered how these pressures impacted district finances and long-term sustainability. Findings were documented in a comprehensive report submitted to the State and incorporated as an exhibit in the Department's official filing to the Court. PCG's analysis provided an evidence-based financial and operational record to inform State decision-making, legal proceedings, and potential corrective actions related to district oversight and funding implementation.

Audit of the Kentucky Department of Education, Kentucky Auditor of Public Accounts, KY. Under the Kentucky Auditor of Public Accounts, PCG provided subject matter expertise to support a special examination of the Kentucky Department of Education. Requested by the state legislature, the review assessed KDE's operational effectiveness in all aspects of its work. This included an assessment of KDE's compliance with federal and state laws and regulations. PCG also collected comprehensive stakeholder feedback from agency staff, LEA superintendents statewide, and State Board of Education members. PCG conducted multiple surveys to support data collection in addition to **over 90 interviews and focus groups**. Surveys were distributed to all KDE staff, superintendents, LEA special education directors, and Area Technology Center (CTE) principals. The work also consisted of reviewing documents, conducting comparison state research, and analyzing student outcomes data. This in-depth analysis yielded a series of recommendations aimed at strengthening the department's organizational structure, policies, practices, and programs. Recommendations aimed to increase compliance and transparency. The final report can be found [here](#).

Systems and Process Review, South Carolina Department of Education. PCG engaged with SCDE to conduct a comprehensive organizational and operational review. PCG reviewed an inventory of all state

"Throughout our relationship with PCG, they have continuously demonstrated their expertise and professionalism, providing high quality, reliable services. We genuinely appreciate our ongoing relationship with them and the thought partnership and guidance they have provided us through this process."

-Rebecca Gunnlaugsson
Chief of Staff

education laws and alignment with policy and procedure, and state priorities and strategies. The review included comprehensive stakeholder feedback from agency staff and LEA Superintendents statewide, including **over 100 focus groups and interviews**. PCG worked closely with agency leadership to assess organizational operations and management and areas for improvement. PCG delivered a final report and provided technical assistance based on the report's recommendations. Recommendations included restructuring of compliance functions in fiscal and grants management as well as federal and state accountability.

Organization & Staffing Audit, Alabama Department of Examiners of Public Accounts. PCG provided an operational and financial analysis of Alabama's state education agency at request of the state legislature. The study goal was to ensure that the ALSDE's core educational functions operate efficiently and effectively contribute to the overall mission of the agency. PCG interviewed 145 stakeholders using a core set of questions, which were customized for their specific roles. We also reviewed and analyzed over 155 documents including state data, policies, strategic plans, budgets, audits, organizational charts, legislative reports, Memoranda of Understanding, state appropriations, and Human Resources practices. PCG prepared draft and final reports of findings, which included approximately 50 recommendations for improvements to the ALSDE's policies, functions, programs, organizational structure, funding, and other areas of note. The findings and recommendations were presented to stakeholders, including to members of the Alabama State Legislature.

The State of Alabama reengaged with PCG to lead the creation of a *Strategy to Action Plan* to drive short- and longer-term reform efforts. This phase of the work included providing regular strategic advising and technical assistance to the State Superintendent and his senior leadership team.

"Our PCG consultants have been instrumental in our efforts to identify needs and areas of improvement. They have also quickly connected us with possible solutions and best practices from across the nation, including education and other sectors, too."

-Dr. Eric Mackey
Alabama State Superintendent

PCG provided technical assistance from May 2020 to May 2023. The final report can be found [here](#).

Operations & Facilities Analysis, Missouri Department of Elementary and Secondary Education. The Missouri Department of Elementary and Secondary Education (DESE) contracted with PCG to conduct a thorough Operations and Facilities Analysis of its state-operated Missouri Schools for the Severely Disabled (MSSD). This was part of a two-phase project in which DESE and PCG partnered to conduct a comprehensive analysis of 34 schools that included MSSD operations, facilities, fiscal management, educational adequacy, and instructional practices for their state-operated program serving students with significant disabilities. The approach, methodology, and work plan for this study was created based on feedback from the State Board of Education which sought to understand the best path forward for MSSD operationally and how students within this program could be effectively served to achieve the greatest outcomes. DESE reengaged with PCG to lead the second phase of the project to include an operational review of the remaining 28 facilities and included a comprehensive instructional review to better understand how students within MSSD were supported in alignment with best practices for working with students with significant disabilities. A Long-Range Advisory Planning Committee was included in the scope of this work to garner stakeholder engagement and support final recommendations regarding MSSD to the State Board of Education.

METHODOLOGY & APPROACH

Understanding the Need

PCG understands that the Charlotte-Mecklenburg Board of Education is seeking a formal compliance assessment to evaluate the District's implementation of applicable federal and North Carolina legal requirements. CMS is the 16th largest district in the U.S., serving over 141,000 students with a \$2.1 billion Operating Budget in 2024-25.¹ This request reflects both the complexity of operating a large public school system and the importance of ensuring the district policies, procedures, and day-to-day practices are consistently aligned to evolving legal and regulatory expectations.

PCG also understands that the Board recently dissolved the Office of Compliance and Ethics and moved associated duties to the Office of General Counsel. This underscores the importance of reassessing compliance structures and internal controls. PCG will deliver a rigorous and independent compliance assessment with clear findings, well-supported risk statements, and recommendations that are feasible to implement. The assessment will validate current practices and identify opportunities to strengthen alignment, transparency, and risk mitigation. The final deliverable will support CMS's 2024-2029 Strategic Plan, specifically the Operational Excellence pillar and its focus on continuously improving the effectiveness of operations across the District.²

Assessment Approach

PCG uses a mixed-method approach, leveraging quantitative data (e.g., student outcomes, financial data, and enrollment data) and qualitative data (e.g., policy and procedure documentation) to define the current state and identify targets and potential strategies, as informed by benchmark data and peer-district and industry best practices.

PCG's findings and recommendations are documented in an accessible way and designed to clearly reflect the district's strengths and areas of opportunity and provide a roadmap for implementation, maximizing operational effectiveness and resulting in stronger outcomes for all students.

PCG's extensive audit and assessment experience has informed our systematic four-step approach encompassing discovery, evaluation, communication, and recommendation activities. While this framework provides a robust foundation for consistent, high-quality assessments, we believe that each engagement is unique. Consequently, we tailor the specific execution of each step to align with the client's needs and goals.



¹ "CMS Fast Facts." Charlotte-Mecklenburg Schools. <https://www.cmsk12.org/about/cms-fast-facts>

² "Charlotte-Mecklenburg Schools Strategic Plan 2024-2029." Charlotte-Mecklenburg Schools. https://resources.finalsite.net/images/v1751938208/cmsk12ncus/ztiufkjckfoc0nyfv/cms_strategic_plan_final6-16-24.pdf

In all our work, we routinely collect and analyze large data sets. Our instrument development, interview methods, and focus group facilitation meet the standards of rigorous research. Our approach is designed to produce findings that are credible, valid, and identify areas of agreement and divergence based on evidence. Our analysis of data is systematic, based on the most appropriate research methods, and produces insights that can proactively inform program implementation, determine gaps, and offer recommendations for continued improvement. In reporting data, PCG emphasizes accessibility and usability of data, communicating data in ways that allow the audience to easily understand it and, critically, to make decisions informed by the data.

Work Plan

PCG proposes that this project be broken into four distinct phases: Project Launch, Data Collection & Analysis, Deliverable Development, and Final Deliverables & Presentations. The details of each phase and the associated deliverables are outlined below. PCG can begin this work immediately. We have the resources, skills, and structures to complete the project on time and on budget.

Phase 1: Project Launch	
Description	This phase will include a project kickoff with the CMS project manager. The meeting will provide the opportunity to develop a shared understanding of project expectations and to establish a strong working relationship between PCG and CMS. PCG will also collect data and documents that will serve as the foundation for Phase 2 of the project – Data Collection & Analysis.
Timeframe	June 2026
Key Activities & Deliverables	<ul style="list-style-type: none"> • Hold kickoff meeting • Create project charter and workplan • Initiate CMS data and document review

Kickoff Meeting: Establishing a strong foundation is essential for a successful project. PCG will work closely with the CMS project manager to establish a close working rapport. Upon contract execution, PCG will facilitate a virtual kickoff meeting to set project expectations, including project deliverables, project timeline, methodology, and vision for successful project outcomes. This initial meeting is an opportunity to ensure PCG and the CMS project manager are on the same page regarding goals and timeline for the work.

Project Charter & Workplan: PCG will prepare a comprehensive project plan that will consist of:

- Key deliverables
- Project workplan, roles and responsibilities
- Project timeline (including milestones and roadmap)
- Agreed upon metrics of success
- Data collection and stakeholder engagement plan
- PCG project management tools and activities

Data & Documents Review: PCG will develop a strong understanding of CMS's current policies, procedures, and practices related to federal and state legal and regulatory requirements to frame the assessment. To support this analysis, PCG will work with the CMS project manager to access relevant data and documents and will use publicly available information when possible. The data and documents list will be refined in collaboration with CMS and aligned to specific focus areas identified for review. The following table includes a sample list of the types of information that PCG will review as part of the assessment:

General District Compliance Information	
<ul style="list-style-type: none"> CMS Board of Education active policies North Carolina School Boards Association (NCSBA) Policies to Lead the Schools (PLS) reference manual and sample policies CMS Board of Education Operating Procedures Manual CMS Board of Education policy process, policy committee governance documents, and policy committee membership CMS Administration (Office of General Counsel and any relevant former Office of Compliance and Ethics) workflow and process documentation regarding support to CMS Board of Education and policy committee as it relates to policy development, policy updates, legal compliance reviews, adherence to statute, and reports of noncompliance 	<ul style="list-style-type: none"> North Carolina Department of Public Instruction (NCDPI) policy manuals and guidance Any prior audit reports, including findings, recommendations, and corrective action plans 2024-2029 CMS Strategic Plan Current CMS administration organizational charts CMS data governance framework, including policies and procedures related to student information system and student records (FERPA)
Finance Department Information, with an emphasis on purchasing and budgeting	
<i>Purchasing-Related</i>	<i>Budget-Related</i>
<ul style="list-style-type: none"> Procurement policies and procedures (including bidding and contract procedures and applicable state procurement laws and guidelines), authority approval matrices, and documentation of purchasing thresholds Vendor selection procedures and policies List of RFPs, bids/quotes, and contracts (including Memorandums of Agreement and Data Agreements, as applicable) awarded in the past two years Procurement exceptions or waivers issues in the past two years, including sole source purchases and determination documentation List of purchases made on state contracts or other blanket or cooperative purchasing vehicles in the past two years Vendor list for the past two years, including active status, payments issued, geographic location, MWBE status, and SBE status Purchasing card policies, procedures, and transactions for the past two years Reports on procurement spend by category, department, and school Data report on purchase orders, invoice numbers, total payments, funding source (grant-funded, bond-funded, or general fund), and associated departments within CMS Procurement roles and responsibilities guidelines/flowchart 	<ul style="list-style-type: none"> CMS Board of Education adopted budget report and budget book for last two years Sample of monthly budget reports Comprehensive Annual Comprehensive Financial Report for last two years Independent fiscal audit reports for last two years, including findings, recommendations, and corrective actions CMS Board of Education Facilities, Finance, and Operations Committee governance documents, committee membership, and relevant processes Federal funds management reports, including Maintenance of Effort (MOE) and Comparability of Services for Title I and IDEA Carryover fund data Asset management tracking procedures

- Documentation of internal control and risk mitigation procedures
- Documentation of reported allegations of fraud, waste, or abuse
- Transaction report on purchase card usage for past two years, including employees with purchase card access, purchase card thresholds, and vendors

Human Resource Department Information

- | | |
|--|--|
| • CMS staff handbook | • Personnel records policies and procedures |
| • Data Export of personnel data with licensure and certification records, salary and pay scale | • Title IX procedures and documentation of complaints, investigations, reports, and training |
| • Salary and pay scale review process | • Policies and procedures related to grievances and retaliation |

Phase 2: Data Collection & Analysis

Description	PCG will develop a robust understanding of current policies, procedures, and practices by reviewing data and documents and conducting interviews and focus groups with District staff.
Timeframe	July – September 2026
Key Activities & Deliverables	<ul style="list-style-type: none"> • Conduct interviews and focus groups • Assess alignment of policies and procedures against federal and state law

Interviews and Focus Groups: PCG will conduct up to 50 interviews and focus groups with key stakeholders to understand the perspectives and experiences of Board members and CMS staff as it relates to compliance with laws and regulations and the current state of the District's policies, procedures, and practices. PCG will primarily complete these engagements in-person during a three-to-four-day onsite visit, with the option to complete a subset of interviews and focus groups virtually.

PCG will develop the interview and focus group list in consultation with CMS. At a minimum, PCG will meet with the following:

- Superintendent
- Chief Financial Officer
- Chief Human Resources Officer
- Associate General Counsel
- Chair, Board of Education
- Board member representatives from Policy Committee and Facilities, Finance, and Operations Committee
- Budget and purchasing staff
- Title IX Coordinator

In conducting the outlined interviews and focus groups, PCG will develop a deep understanding of existing CMS implementation practices related to legal and regulatory requirements.

Alignment of Policies and Procedures: Using the evidence gathered from the data and document review, in addition to interviews and focus groups, PCG will analyze CMS's current alignment with federal and state laws and regulations. This analysis will be the foundation for the findings, recommendations, and corrective actions generated in Phases 3 and 4 of the project.

Phase 3: Deliverables Development

Description	PCG will analyze data collected in Phase 2 to assess compliance and alignment with legal and regulatory requirements and gaps or areas of risk. PCG will facilitate a work session with District leadership to discuss early findings and then draft the assessment report that outlines findings and recommendations for corrective action, as needed.
Timeframe	September – October 2026
Key Activities & Deliverables	<ul style="list-style-type: none"> Facilitate an in-person work session with District leadership Draft assessment report with findings and recommendations for corrective action

Phase 4: Final Deliverables & Presentations

Description	PCG will finalize the assessment report with findings and recommendations for corrective action. PCG will present assessment findings and the associated corrective action plan to the Board, upon request. PCG will prepare all presentation materials and is prepared to lead the presentation either in person or virtually at any point during Phase 4.
Timeframe	November 2026
Key Activities & Deliverables	<ul style="list-style-type: none"> Finalize assessment report and corrective action plan Present findings to the Board

Additional Services

PCG can also offer CMS dedicated implementation support following delivery of the assessment report and corrective action plan in Phase 4. Implementation support services would be designed to help CMS translate recommendations into practice by providing direct guidance, project management, and technical assistance as the District moves forward with implementation. PCG's implementation support can include developing monitoring tools, supporting policy updates, and advising on change management strategies to ensure that improvements are effectively adopted and sustained. The PCG team will work collaboratively with CMS leadership to track progress against established metrics and adjust approaches as needed. Implementation support can be tailored to the District's evolving needs.

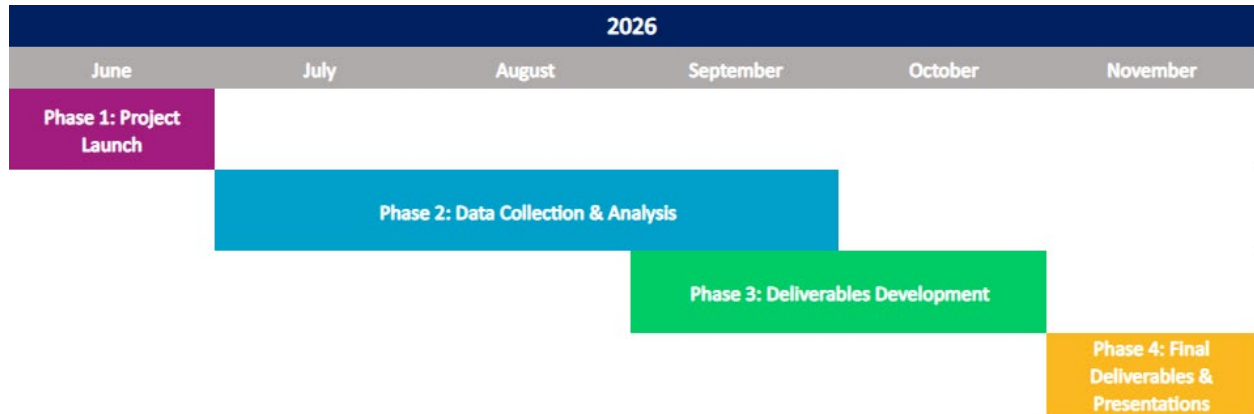
SAMPLE DELIVERABLES & REPORTS

We have collected a selection of relevant deliverables and reports from recent projects that demonstrate our skills and expertise for this project. Some of the samples are redacted while others are public facing documents. They are featured in the following order:

1. Findings & Recommendations Presentation for a Comprehensive Audit
2. Final Report for Operation & Management Review of a School District
 - a. Section on *Human Resources Department*
3. Student Support Action Plan for Arlington Public Schools
4. Final Report on the Kentucky Department of Education, the Kentucky School for the Blind, the Kentucky School for the Deaf, and the Department Operated Area Technology Centers (the full report can be accessed [here](#))
 - a. Chapter on *Monitoring & Consolidated Monitoring*
 - b. Chapter on *Exceptional Children*
5. Final Report for Operational Study & Analysis of the Alabama Department of Education (the full report can be accessed [here](#))
 - a. Sections on *School and District Accountability* and *LEA Perception of Accountability and Assistance*
 - b. Chapter VII: *Priority Recommendations* and Chapter VIII: *Additional Recommendations*
 - c. Section on *List of Reviewed Documents*

Please see the [Appendix: Work Samples](#) for the relevant documents.

TIMELINE FOR COMPLETION



COST OF ASSESSMENT

PCG is eager to partner with CMS, and we have priced our proposal to demonstrate that interest. We are confident that we provide the best value for an exceptional level of service.

PCG is fully open to further conversation to refine the project scope to best meet your budget.

Phase of Work	Cost
Phase 1: Project Launch	\$34,500
Phase 2: Data Collection & Analysis	\$110,475
Phase 3: Deliverables Development	\$99,175
Phase 4: Final Deliverables & Presentations	\$50,850
TOTAL COST	\$295,000.00

In preparing the approach, timelines, and pricing that is detailed within this proposal, PCG has assumed the following:

- The total cost for Phases 1-4 is **\$295,000.00**.
- PCG has assumed all work occurs between June 2026 and November 2026 for the above not to exceed price.
- Costs are fully inclusive of all incidentals, travel, and non-salary expenses. Overhead costs are included within PCG's standard rates.
- PCG has assumed a total of two onsite visits (six days total) over the course of the project.
- PCG has allocated \$10,355.00 for all travel and other anticipated expenses over the six-month period.
- Work will occur in a hybrid structure, with primarily virtual engagements.
- PCG is prepared to begin work immediately.
- PCG has developed a project timeline that ensures a final report deliverable by November 2026.

KEY PERSONNEL & QUALIFICATIONS

PCG will commit an experienced team to fully address the requirements of this project. The team's background is augmented by PCG's years of experience partnering with schools, districts, and states to assess programs and to support high-impact and high-profile systems change. Proposed team members have extensive experience with data-driven, compliance-oriented audits and will tailor the assessment approach based on CMS's context.

In addition to our dedicated key personnel, PCG's Legal and Governance, Risk and Compliance (GRC) teams will internally work closely with our project team to identify and mitigate any risks to both the project and to the client. GRC, led by PCG's head Compliance Officer, is an integrated collection of capabilities that enable an organization to reliably achieve objectives, address uncertainty, and act with integrity. The partnership and oversight of Legal and GRC are woven into each phase of our project plan.

Name & Role	Project Responsibilities
Anna d'Entremont Engagement Manager	High-level client communication and overseeing the entire project to completion.
Dr. Aubrey Comperatore State Advisor	Provide state- and District-specific guidance and stakeholder engagement support to ensure all deliverables and services align with District priorities.
Amy Nasr Project Manager	Manage project team collaboration and oversees the delivery of high-quality deliverables and services. Ensure the project meets its goals while remaining within the contracted budget and scope of work.
Meredith Crouse Subject Matter Expert: Finance	Provide subject matter expertise on finance and operations compliance. Lead the development of the final deliverable, conduct research and data analysis.
Dr. Steve LaBounty Subject Matter Expert: Human Resources	Provide subject matter expertise on human resources compliance. Lead the development of the final deliverable, conduct research and data analysis.
Jacob Klett Subject Matter Expert: Special Education	Provide subject matter expertise on special education compliance. Lead the development of the final deliverable, conduct research and data analysis.
Lexi Harless Analyst	Provide research and data analysis support, coordinate project logistics.
Ana Earl Analyst	Provide research and data analysis support, coordinate project logistics.

Anna d'Entremont is a Manager with PCG who will serve as **Engagement Manager**. Anna brings over two decades of education and management experience to this project and currently oversees PCG's education strategy portfolio. She has a strong background in understanding the organizational policies and practices essential to support program and process improvement. She has worked with numerous public sector clients across the county, delivering consulting services, including audits, strategic planning, and guiding educational leaders through change management. She also has deep expertise in special education policy. State-level clients include Alabama, Delaware, Florida, Kentucky, Massachusetts, Minnesota, New Hampshire, Rhode Island, and South Carolina among others. Urban school district clients have included the Clark County School District, Detroit Public Schools, Newark Public Schools, the School District of Philadelphia, Baltimore County Public Schools, Boston Public Schools, and Chicago Public Schools.

Anna has a long history working in urban education. Prior to joining PCG Education in 2008, Anna was the Director of Operations of the Edward W. Brooke Charter School in Boston, MA. In this role, she served as co-director and the operational leader of a high-performing urban charter school. She oversaw all non-academic functions, including financial and compliance oversight. Anna also worked as a Program Officer at New Visions for Public Schools, where she managed a diverse portfolio of initiatives designed to support and develop high school reform and innovation across the New York City Public Schools. In this role, she

supported the design and creation of over 100 small high schools throughout New York City as part of the New Century High Schools initiative. Anna began her career as a teacher for the Houston Independent School District and DC Public Schools. She is a Teach for America alumna and completed her Ed.M. in Education Policy from Teachers College, Columbia University. She recently received a certificate in Strategic Transformation in Times of Disruption from the Stanford University Graduate School of Business. Anna currently resides in Massachusetts; she previously lived in North Carolina.

Aubrey Comperatore, Ph.D. is a Senior Consultant and for this project she will act as the **State Advisor**. She is the North Carolina lead for PCG's education work across the state, including with NCDPI and LEAs such as CMS. As the NC state lead, Dr. Comperatore actively collaborates with stakeholders across school systems and the broader NC education ecosystem to help provide solutions to the challenges and roadblocks educators face. She is responsible for coordinating PCG services and solutions across teams, ensuring consistent, high-quality, and timely delivery and partner satisfaction.

A former North Carolina public school elementary teacher, Dr. Comperatore's background is in education policy research and evaluation, having worked as a Post Doctoral Scholar and Research Associate at the Education Policy Initiative at Carolina (EPIC) at UNC Chapel Hill, with partners such as NCDPI, the UNC System, and NC LEAs. Prior to joining PCG, Dr. Comperatore was the Project Director of Research and Evaluation for Trewon Technologies, LLC, a federal contracting and consulting firm, overseeing a suite of contracts and consulting with the US Departments of Education, Labor, State, and Homeland Security, and the National Science Foundation, including supporting ED with Title II compliance data.

Dr. Comperatore holds an M.A. and a Ph.D. in Education (Early Childhood, Special Education, & Literacy track) from the University of North Carolina at Chapel Hill, and a B.A. in Elementary Education from Rowan University. She currently resides in Wake County, North Carolina.

Amy Nasr is a Senior Consultant with PCG who will serve as **Project Manager**. She oversees project team collaboration and execution of high-quality deliverables and services. Amy's recent project work at PCG focuses on district- and state-level organizational reviews, which includes assessing compliance with federal and state laws and regulations. Recent clients include Clark County School District and the Kentucky Auditor of Public Accounts. With more than a decade of experience in the education sector, she is passionate about leveraging data and research to advance K-12 educational outcomes.

Prior to joining PCG, Amy worked at Teach For America where she developed and executed system-level strategies related to educator preparation, diversity, and retention. Amy was responsible for steering the organization's learning agenda and surfacing insights across multiple diverse learning and evaluation projects. She previously led TFA's external evaluations portfolio, which ultimately helped the organization maintain \$70M+ in public funding. She began her career as a fifth-grade English Language Arts teacher in Houston. During her time in the classroom, she served as her school's fifth-grade team leader. Amy also has experience working in business development and marketing communications at Pearson Education. Amy holds a Master of Education from Harvard Graduate School of Education and a Bachelor of Science from Carnegie Mellon University. She currently resides in Washington D.C.

Meredith Crouse is a Senior Lead Advisor with PCG, who will serve as **Subject Matter Expert: Finance** for this engagement. Meredith works with state labor and education agencies, school districts, workforce development boards, as well as secondary and postsecondary institutions nationwide on engagements related to organizational assessments, management and operations reviews, strategic planning, process review, and college and career pathway initiatives.

Meredith's recent work includes leading projects with state education agencies in Kentucky, South Carolina, Massachusetts, New Jersey, and Ohio, as well as school districts in Clark County (Las Vegas), Philadelphia, and Colorado Springs. In her work with Kentucky, Meredith is conducting an assessment of the Finance division of a large urban school district, including a review of purchasing and budgeting policies, procedures, and practices for adherence to state law and best practice. Particular focus areas include sole source and noncompetitive negotiation procurements, purchasing documentation, contract administration and oversight practices, budget development and management, use of fund balance (including carryover and contingency funds), roles and responsibilities of Board and administration, and workflows and practices

of General Counsel and Internal Audit. Recommendations include opportunities to reduce risk, improve transparency, clarify and update policy and procedure, and train staff.

Prior to joining PCG, Meredith worked for Boston's Workforce Development Board, managing work-based learning programs with Boston Public Schools and employers. She also led the Boston Healthcare Careers Consortium, a sector convening of business, education, and the workforce system that has been recognized by the U.S. Department of Labor as a national model for leadership in industry collaboration. Meredith has direct-service experience providing job-readiness coaching to youth and adults, as well as supporting community college training programs with curriculum alignment to industry needs and connecting graduates to employment. She also has experience in higher education institutional research. Meredith holds a Bachelor of Science degree from Virginia Tech and a Master of Public Administration from Cal Poly Pomona. She currently resides in Virginia.

Dr. Steven LaBounty is a Senior Lead Advisor at PCG and will act as **Subject Matter Expert: Human Resources**. He is recognized for his extensive experience in human capital and change management across state and local agencies in the public sector. He has directed teams in Massachusetts, Rhode Island, and Texas to develop and optimize organizational systems. Dr. LaBounty is proficient in leading strategic policy initiatives related to board governance, performance management, assessment methodologies, performance-based compensation structures, and talent development programs. Additionally, he holds the Society for Human Resources Management Certified Professional (SHRM-CP) credential, affirming his dedication to advancing human resources as a vital organizational function.

Prior to joining PCG, Dr. LaBounty led a team at the Texas Education Agency, overseeing principal and teacher evaluation systems and implementing the Teacher Incentive Allotment from House Bill 3, which aims to help teachers earn six-figure salaries while staying in the classroom, with special focus on high-needs and rural schools. He also worked at the Rhode Island Department of Education, specializing in evaluation and professional learning policy, which built on his experience as a teacher, curriculum coordinator, and school leader for nearly a decade.

Dr. LaBounty holds a K-12 school superintendent certification and earned his Ed.D. from Northeastern University, his M.Ed. from Bridgewater State University, and his B.Mus. from UMass Amherst. He currently resides in Texas.

Jacob Klett is a Senior Managing Education Advisor at PCG and will serve as **Subject Matter Expert: Special Education** for this engagement. Jacob Klett has more than 17 years of experience improving special education programs under the Individuals with Disabilities Education Act (IDEA). His work at PCG focuses on strengthening special education systems at the state and local levels through targeted technical assistance, systems improvement consultation, and staff training. His recent work includes instructional and operational reviews of special education programs, analyses of compliance monitoring and dispute resolution systems, and support for legislatively required audits. Prior to PCG, Jacob served as a Director at the Texas Education Agency, where he led teams responsible for policy, compliance oversight, and technical assistance. As a state leader, Jacob provided critical oversight of IDEA and state requirements within local education agencies by ensuring noncompliance was addressed in a timely manner through collaborative corrective action processes. He has also designed and facilitated successful educator trainings and taught graduate-level courses on special education at the University of Denver. Jacob brings a collaborative, detail-oriented approach to helping states and districts meet IDEA obligations and improve outcomes for students with disabilities through consistent and coherent systems.

Lexi Harless is a Consultant at PCG and will serve as an **Analyst**. Lexi is committed to identifying gaps within education systems and leveraging evidence-based strategies to meet the needs of diverse populations within education. Prior to joining PCG, Lexi served as the Policy & Research Analyst at the Tennessee Department of Education, where she translated complex policy and research into strategic insights—such as national landscape analyses, policy reports, and research briefs—to advance state policy priorities and facilitate partnerships with state and national stakeholders. Her writing and data analysis examined key policy priority areas in the state, including academic acceleration, mathematics instruction, teacher development and effectiveness, and English

Learners. Additionally, Lexi's experience in higher education offered her the opportunity to utilize data in coordinating complex admission processes and driving recruiting and advising efforts for prospective students. Her experience in both K-12 and higher education underscores the value of connecting research and engagement to develop impactful solutions to the evolving challenges in education today.

Lexi holds a B.A. in Psychology from the University of Tennessee and an M.A. in Educational Policy Studies from Boston University. Her focus areas include educator workforce development, impact evaluation, the research-to-practice gap, and the role of place in educational opportunity. She currently resides in Tennessee.

Ana Earl is a Consultant with PCG and will serve as an **Analyst**. She is passionate about helping education systems become more equitable and effective through data-informed strategy and stakeholder engagement. Recent projects have included an organizational review of Jefferson County Public Schools Organizational Review for the Kentucky Auditor of Public Accounts and the Statewide Graduation Council Consulting Services for the Massachusetts Executive Office of Education (EOE).

Prior to joining PCG, Ana worked at the Rennie Center for Education Research and Policy, where she contributed to consulting projects with districts and education organizations across Massachusetts. She also supported policy work by tracking and analyzing legislation and reporting on key education issues. Ana began her career as a middle and high school history teacher in rural Idaho through Teach for America. This experience sparked a deep commitment to addressing educational inequities and ultimately led her to pursue a career in education policy to expand access to high-quality education for all students. Ana holds a Bachelor of Arts in International Development from McGill University and a Master of Public Policy from Duke University. She currently resides in Massachusetts.

APPENDIX: WORK SAMPLES

1. Findings & Recommendations Presentation for a Comprehensive Audit
2. Final Report for Operation & Management Review of a School District
 - a. Section on Human Resources Department
3. Student Support Action Plan for Arlington Public Schools
4. Final Report on the Kentucky Department of Education, the Kentucky School for the Blind, the Kentucky School for the Deaf, and the Department Operated Area Technology Centers (the full report can be accessed [here](#))
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 - c. Section on List of Reviewed Documents

[Redacted District Name]: Comprehensive Audit

Findings and Recommendations

Report Organization

- Audit Framework and Methodology
- District Community
- Student Outcomes
- Priority Recommendations
- Detailed Findings & Recommendations
 - Organizational Leadership
 - Instructional & Programmatic Practices
 - Professional Learning and Growth
 - Resource Distribution
 - Family Engagement
 - Climate and Culture
- Conclusion and Next Steps



Audit Framework



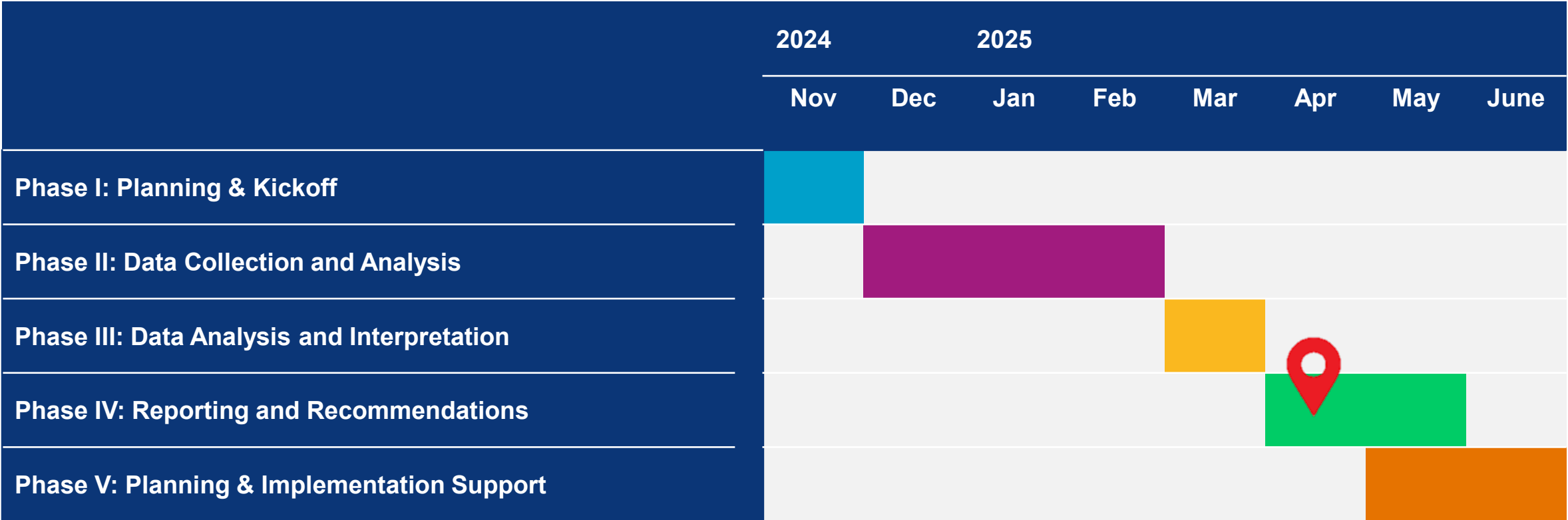
Audit Scope

The scope for this access and opportunity audit in [REDACTED] includes **six research focus areas**, in alignment with PCG's overall Access and Opportunity audit framework:

1. Organizational Leadership
2. Instructional & Programmatic Opportunities
3. Professional Learning and Growth
4. Resource Distribution
5. Family Engagement
6. School Climate



Project Timeline



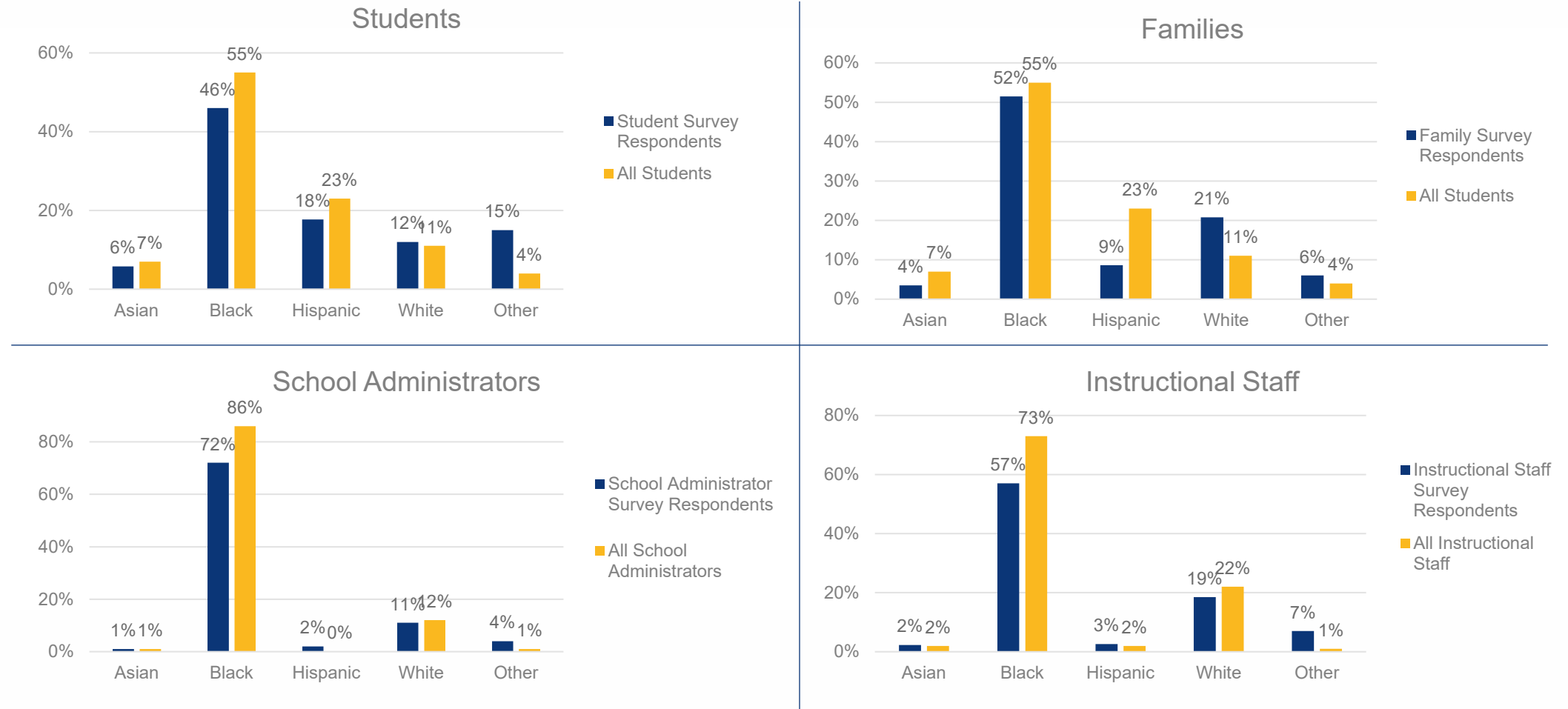
Data and Document Review

PCG conducted a review of data and documents within each research focus area.

Organizational Leadership	Instructional & Programmatic Opportunities	Professional Learning & Growth	Resource Distribution	Family Engagement	School Climate
<ul style="list-style-type: none">• Strategic plan• Student handbooks• Organizational charts• Administrator & staff surveys• District demographics	<ul style="list-style-type: none">• School parent/student handbook• School choice options• Code of student conduct• Course and programs by school• Extracurricular options• Student assessment outcomes• Graduation rates• IEP assignment• Enrollment at theme and magnet schools	<ul style="list-style-type: none">• Professional development offerings• Professional development self-assessment process	<ul style="list-style-type: none">• Federal, state, and local per pupil expenditures• Construction & building financial documents• Budget book• Donation transactions for all schools• Teacher certificate and years of experience	<ul style="list-style-type: none">• Family engagement framework• Family & community empowerment & grants/partnerships	<ul style="list-style-type: none">• Previous climate surveys• School-based activities and events• Staff, parent, student, admin survey• Bullying data• Discipline data

Stakeholder Survey

PCG conducted a survey of middle and high school students, families, instructional staff, and school administrators. The family survey was offered in 16 languages.



Notes: On average, 9% of respondents selected "Prefer not to Respond" when asked to identify their race or ethnicity.

Source: Data retrieved from PCG survey.

Stakeholder Engagement

PCG conducted stakeholder engagement as part of the data collection process. Stakeholder engagement included focus groups, individual interviews, and small group interviews. The table below lists the **focus groups conducted**.

Stakeholder Group	Stakeholder Engagement	Number of Sessions	Number of Individuals Engaged
Family	Family Focus Groups	6	28
	Parent Advisory Council	1	23
	Bilingual Advisory Committee	1	7
Student	Student Advisory Committee	1	33
	Middle & High School Students Focus Groups	7	67
Staff	Access & Opportunity Steering Committee	1	10
	Principal Focus Groups	3	26
	Teacher Focus Groups	4	28
	Total	24	222

*Focus groups were conducted both virtual and in-person.

*Participants were randomly selected by PCG for family/parent & student focus groups



Stakeholder Engagement

The table below lists the **individual and small group interviews conducted** with district staff and leaders.

Engagement Type	Stakeholder	Number of Individuals Engaged
Individual Interviews	Board Members Interview	6
	Superintendent Interview	1
	Division Chiefs and Executive Directors Interviews	12
	Executive Director Interview	1
Small Group Interviews	Wrap Around Services Small Group Interview	5
	Instructional & Informational Technology Small Group Interview	5
	Area Superintendents	7
	Family & Community Engagement Small Group Interview	4
	Budget Personal Small Group Interview	3
	Human Resources Small Group Interview	7
	Student Services Small Group Interview	5
	Culture & Climate Coordinators Small Group Interview	7
	TOTAL	62

*Focus groups were conducted both virtual and in-person.

*Participants were randomly selected by PCG for family/parent & student focus groups



Mixed Methods Research Design

Quantitative Analysis

PCG analyzed a range of quantitative data items, including:

- Student, teacher, and administrator demographics
- State assessment results
- Graduation rates
- Participation in advanced coursework and SAT & ACT tests,
- Disciplinary referrals
- School funding
- School enrollment and capacity
- School building age

In our quantitative analysis, PCG disaggregated data by student demographic subgroups.

Qualitative Analysis

PCG used ATLAS.ti to code qualitative data, including:

- Responses to open-ended survey questions
- Focus group notes
- Interview notes

PCG's analysis was guided by six key focus areas: Organizational Leadership, Family Engagement, School Climate, Instructional & Programmatic Opportunities, Professional Learning and Growth, and Resource Distribution. These categories serve as a consistent coding framework across all stakeholder groups, allowing us to identify themes, understand stakeholder perspectives, and align findings with the goals of the project. For each area, we also coded whether the data reflects a "need" or a "strength" as explained by the respondent. This structured approach helps ensure that the data is analyzed systematically.

Survey Data & Heatmaps

EXAMPLE

The total number of participants is shown for each group being analyzed

Research Area	All	Elementary (PreK-5)	Middle (6-8)	High (9-12)
Total Number of Participants	4,680	2,640	897	1,143
Staff have high expectations for every student regardless of background.	81%	85%	80%	75%

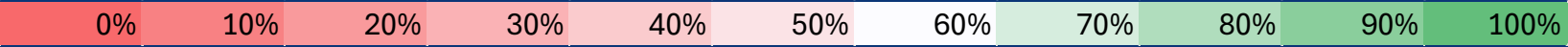
Survey question used by PCG

Groups are segmented by school level and by race/ethnicity

Percent of respondents that answered “Agree” or “Strongly Agree” to the survey question

PCG used the **Alchemer survey platform** to collect responses and then **organized the matrix question data into a heatmap** using conditional formatting, segmented by race/ethnicity and school level.

Conditional formatting displays values from red to green. The darker red corresponds to the lowest values and the darkest green corresponds to the highest values



Classroom Visits

PCG used a structured classroom visit protocol with a focus on Teacher's Practice and Student Learning.

The visit focus areas include:

- *Instructional Strategies*
- *Classroom Culture and Environment*
- *Student Relationship Building*
- *Facilities*

- PCG conducted classroom visits in January and February 2025. PCG visited [REDACTED]
- **PCG selected classrooms for visits.** In identifying classrooms to visit, PCG utilized a selection methodology to ensure a representative sample of grade levels, classroom content areas, and course type (e.g. standard, remedial, ESOL, advanced).
- **A team of two PCG observers visited** each classroom.

EXAMPLE: Classroom Visit Summary

Desired Outcomes:

All teachers engage students in high quality instruction ensuring that every student regardless of their background has the tools, resources, and inspiration to reach their full potential.

Evidence based strategy	Core Practice	Focus Area	% of visits demonstrating core practice
The environment is socially and intellectually supportive of students.	Teacher instructs and models a growth mindset	Teacher Practice	24%
	Teachers create expectations and criteria for peer collaboration and feedback.		27%

Strategies derived from research that are shown to support the desired outcome(s)

Evidence of strategy in practice. *Core practices* are the indicators that PCG looks for in classroom visits.

Focus area captures whether the core practices are focused on *teacher practice* or on *student learning*.

Percent of classroom observations where PCG observed the core practice in action. PCG does not expect to see all core practices exhibited in every classroom within the time frame of the observation. There is not an expectation of 100% demonstration.

Strategies Analysis at a Glance

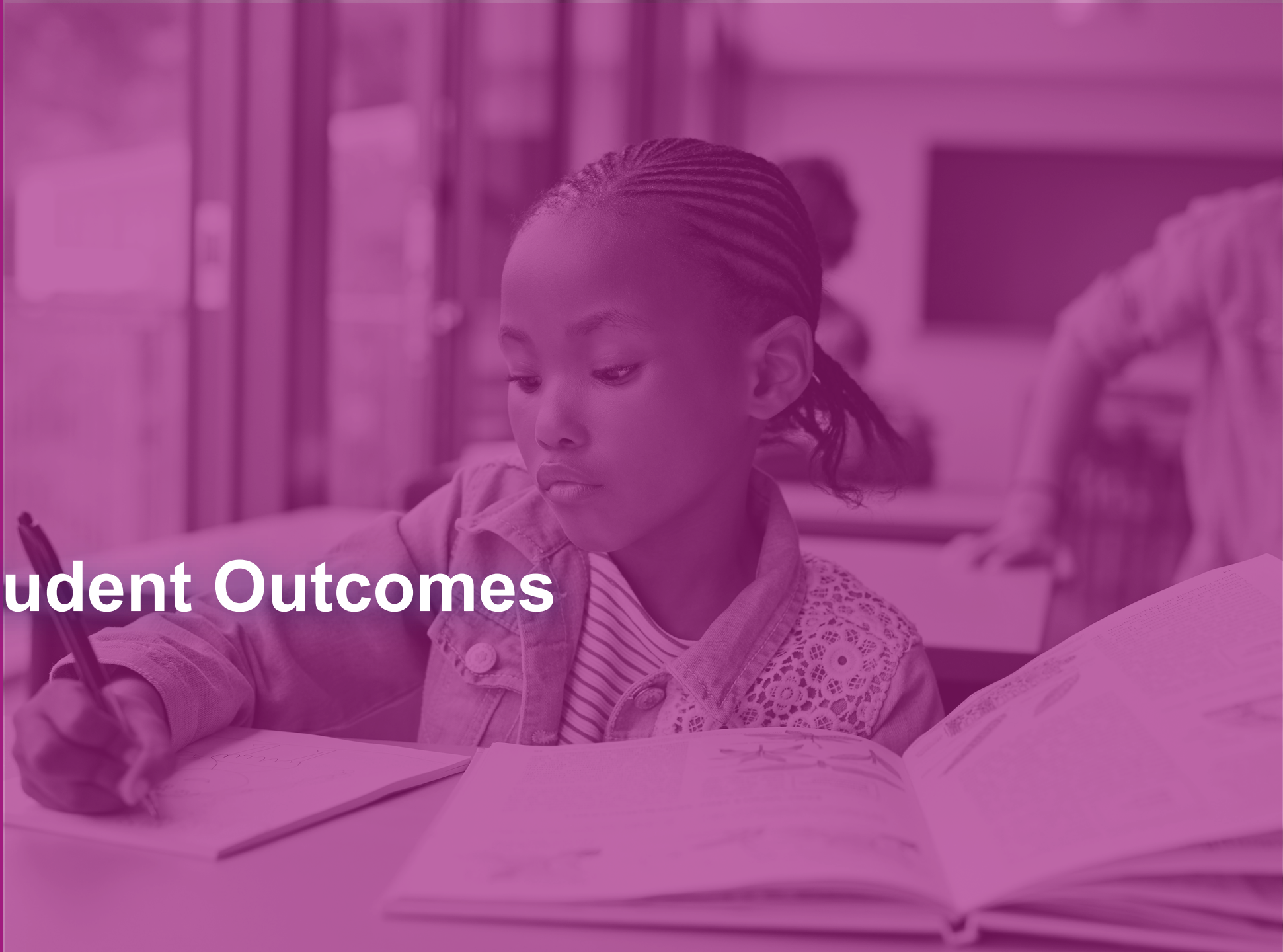
In each research area, PCG has summarized our analysis of all data sources, including quantitative and qualitative data such as interviews, focus groups, and classroom observations, through a **Strategies Analysis at a Glance**. This tool, found within each section of the presentation, serves as a high-level rubric to identify and analyze the implementation of core Access and Opportunity strategies across the classrooms.

Desired Outcome: List of desired outcome(s) based on the focus area				
Evidence-Based Strategies <i>Strategies needed to effectively move towards the desired outcome(s)</i>	Core Practices <i>Examples of a district's effective use of the evidence-based strategy</i>	Observed in [REDACTED]?		
		Yes	Partial	No

Determinations on whether core practices were observed in [REDACTED] were made based on the data collected from the district, publicly available sources, and stakeholder engagement efforts over the course of this access and opportunity audit.

- A “Yes” designation means that a practice was fully observed or was agreed upon by most or all stakeholders engaged in data collection.
- A “Partial” designation means that a practice was observed partially, occasionally, inconsistently, or not agreed upon by most or all stakeholders.
- A “No” designation means PCG did not observe the practice. A “No” designation does not definitively mean that a particular practice doesn’t exist in [REDACTED], simply that PCG did not observe evidence of the practice during this audit.

Student Outcomes



Student Outcomes

State assessment Gap Analysis

PCG examined differences in [REDACTED] proficiency across the following subgroups:

- Students with disabilities
- Students with limited English proficiency
- Economically disadvantaged students
- Black and African American students
- Hispanic students
- Asian students
- Multiracial students
- Female students
- Male students

Data was retrieved from gaawards.gosa.ga.gov/analytics and is aggregated across grades 3-8.

Proficiency Rates are defined as the percentage of students identified as *Proficient Learners* or *Distinguished Learners* on the [REDACTED].

Proficiency Gaps are defined as the difference between the proficiency rate of the identified subgroup and the proficiency rate of the entire analytic dataset (all student test takers grades 3-8).



Student Outcomes

State Assessment

There are large gaps in the proficiency rates between student demographic groups in 2024.

Proficiency rates are defined as the percent of students receiving a *Proficient Learner* or *Distinguished Learner* score.

In the table below, **positive numbers** indicate the number of percentage points this demographic groups scored **higher than the District average**. **Negative numbers** indicate the number of percentage points this demographic group scored **lower than the District average**.

Student Groups	In comparison to...	
	ELA All students, grades 3-8 2023-2024	MATH All Students, grades 3-8 2023-2024
Students with IEPs	-24	-18
English Learners	-25	-16
Economically Disadvantaged Students	-8	-8
African American or Black Students	-5	-7
Asian Students	+12	+22
Hispanic or Latinx Students	-12	-9
White Students	+40	+42
Multiracial Students	+21	+16
Female	+4	-2
Male	-4	+2

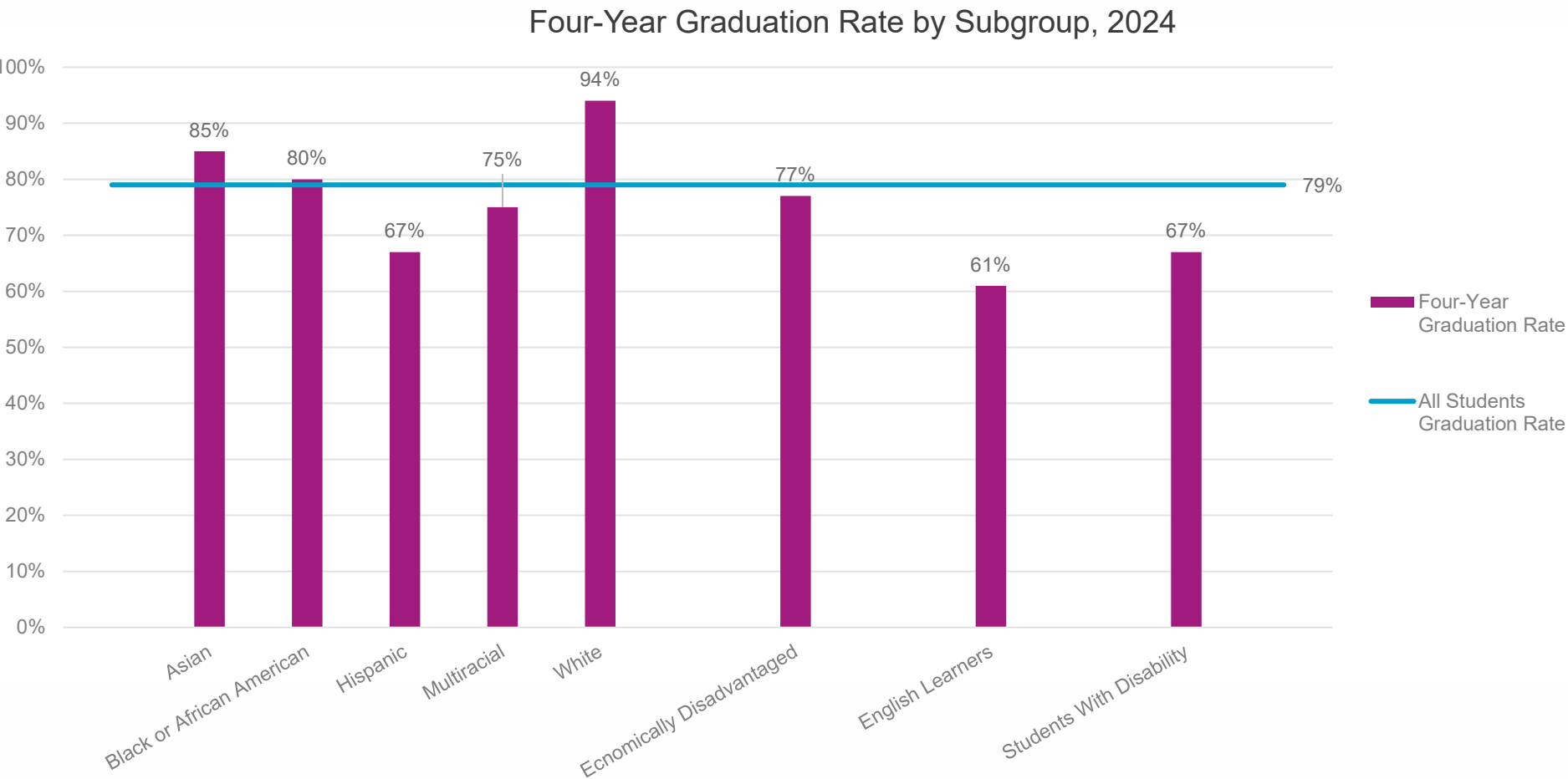
Across both ELA and Math, **White, Asian, and Multiracial students score higher than the district average**, while all other subgroups score lower, with **students with IEPs, English Learners, and Hispanic or Latinx students scoring the lowest** of the subgroups.

Note: .
Data retrieved from .



Student Outcomes

Graduation Rate



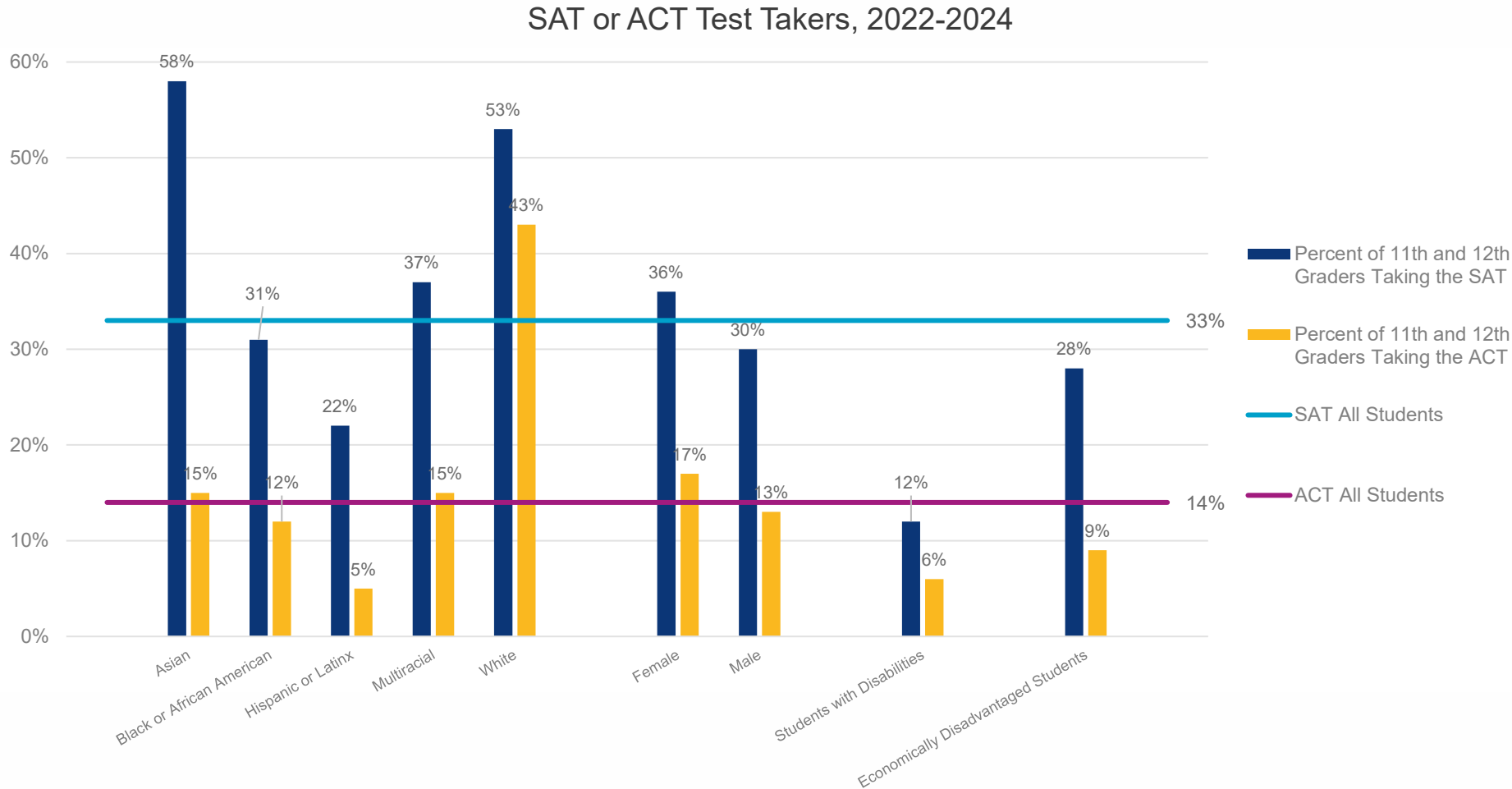
Hispanic Students, English Learners, and Students with Disabilities have a significantly lower 4-year graduation rate than the district average. White students have a 4-year graduation rate of 94%, 15 percentage points higher than the district average.

Note: Data retrieved from [redacted]



Student Outcomes

SAT and ACT



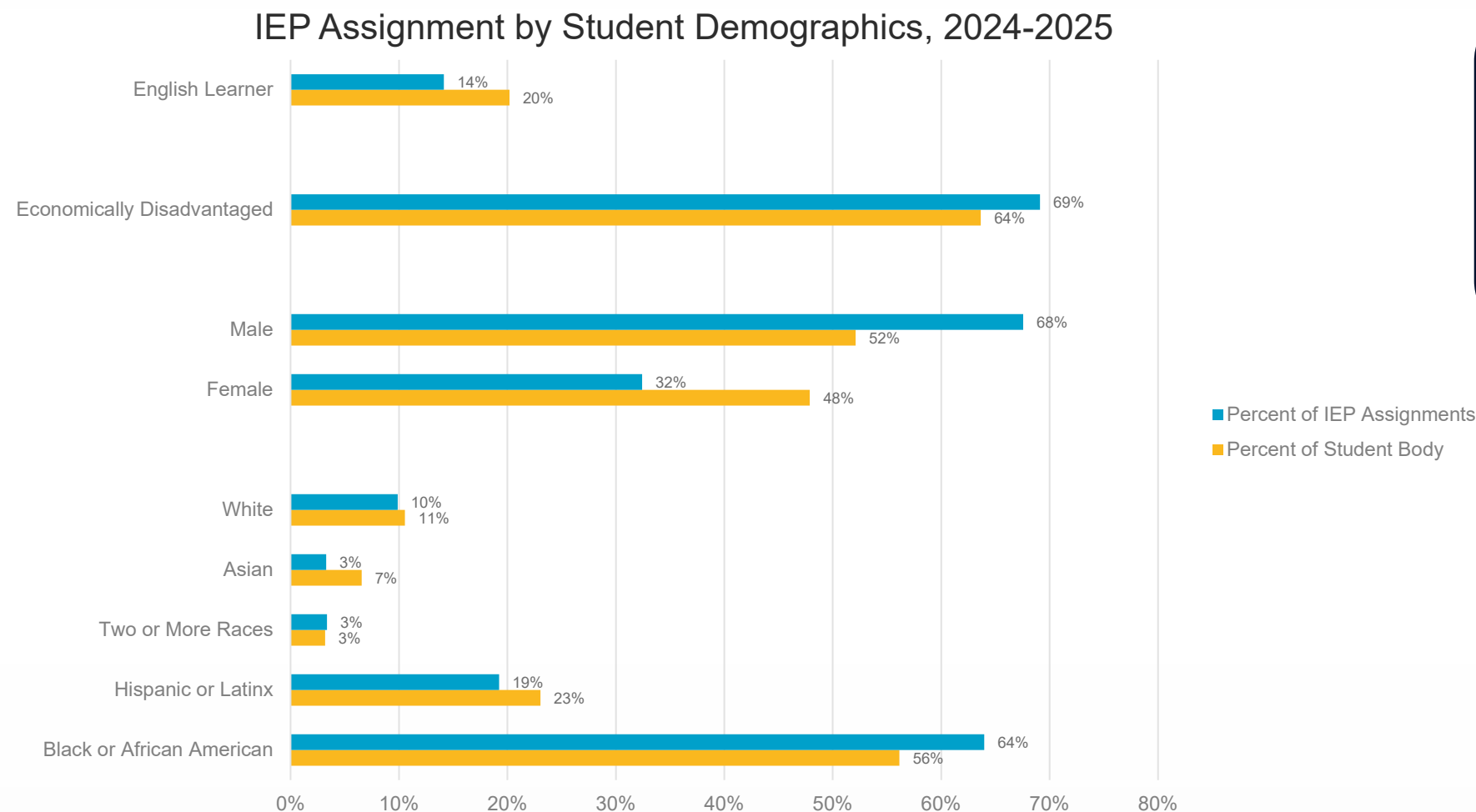
Hispanic Students and Students with Disabilities are significantly underrepresented in SAT and ACT test takers, with 33% of students in the district taking the SAT but only 5% of Hispanic Students taking it. White and Asian students, however, are overrepresented in both tests.

Note: Data provided by [redacted]



Data Visualization Examples

IEP Assignments by Student Demographics



Male students, and Black students, and economically disadvantaged students are over-represented in the population of students with IEP assignments.

Note: Data provided by [redacted]



Risk Ratio Analysis: Disproportionality in IEP Assignment

Disaggregated IEP assignment data was provided by [REDACTED] for the 2024-25 school year. PCG calculated risk ratios, which are used to examine whether students from different subgroups are overrepresented in IEP assignment. Risk ratios are calculated using the following formula:

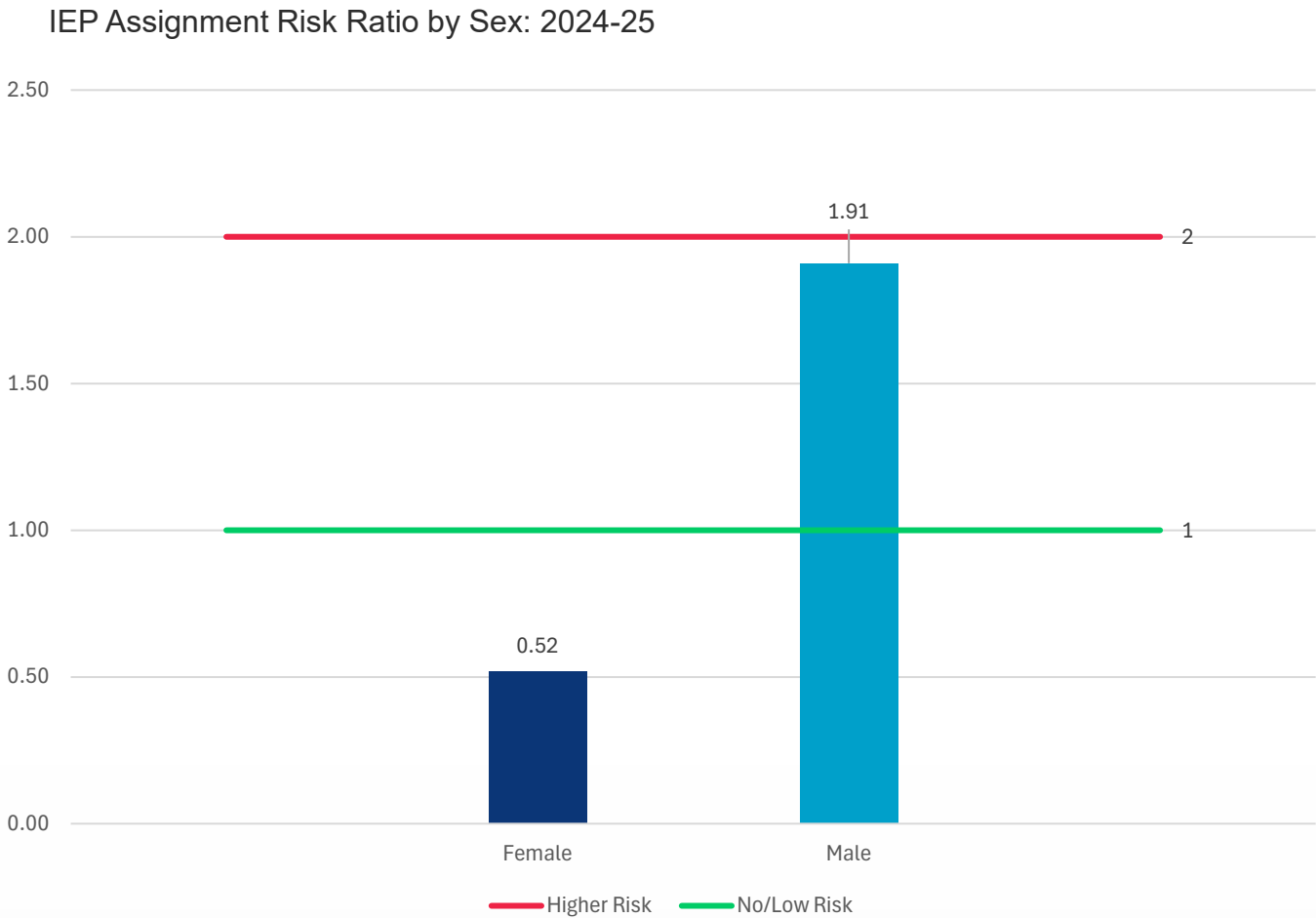
$$\text{Risk Ratio} = \frac{\text{Number of students from a subgroup with an IEP} \div \text{the total number of students in the data set from that subgroup}}{\text{Total number of students with a IEP excluding the same subgroup} \div \text{the total number of students in the data set excluding that subgroup}}$$

A risk ratio of 1.0 means there is no association between the student's demographic group and their likelihood of having an IEP. A risk ratio of **greater than 1.0** indicates a risk of overrepresentation in IEP assignment, while a risk ratio of **less than 1.0** indicates possible underrepresentation. Student subgroups with fewer than twenty (20) students in the data set were excluded from analysis.

IEP Assignment by Sex

Race	All Students	Students with IEPs
Female	49,656	4,097
Male	54,039	8,536
Total	103,695	12,633

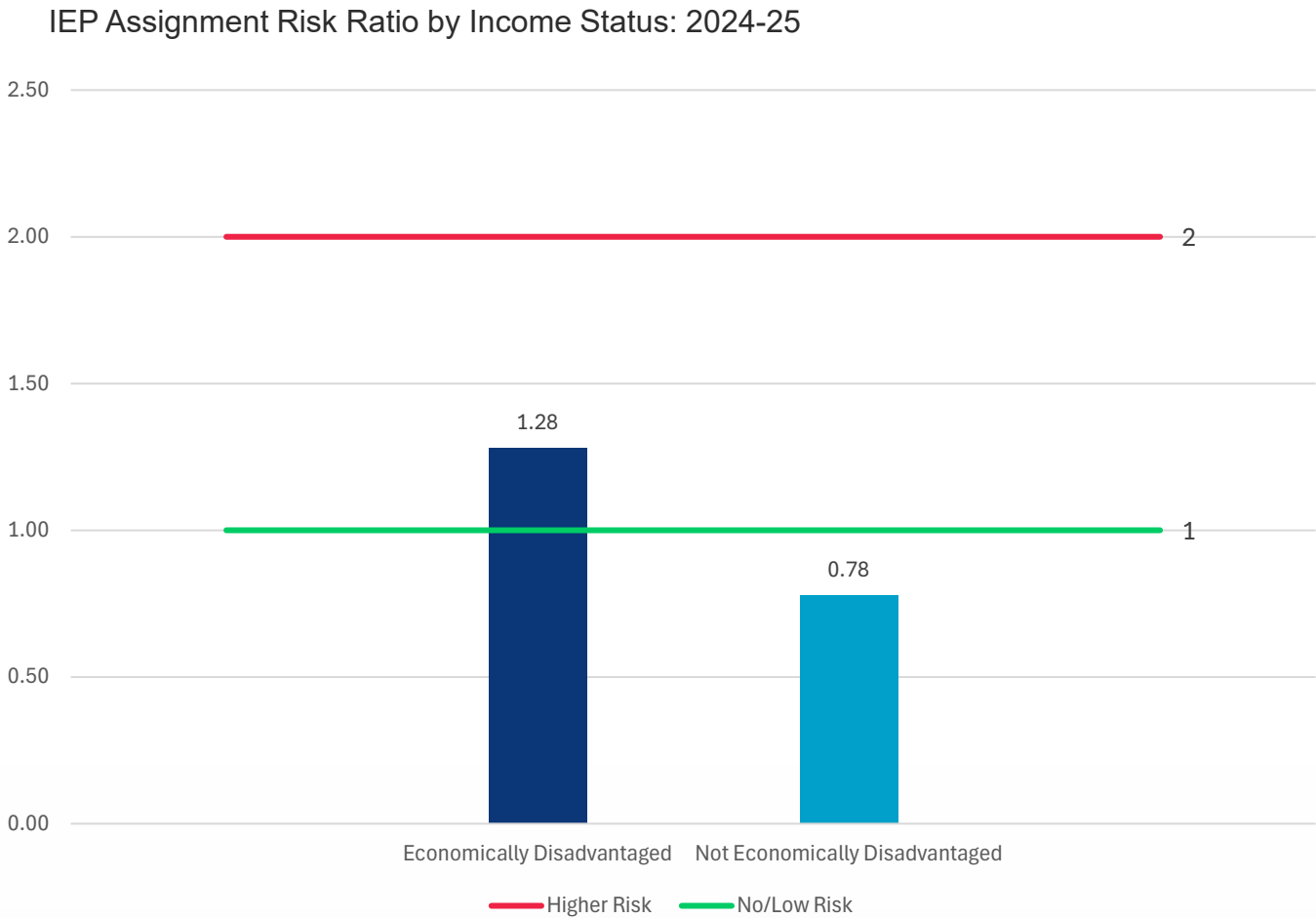
- Male students are **1.91 times** more likely to have an IEP as all other students in the district.



IEP Assignment by Income Status

Race	All Students	Students with IEPs
Economically Disadvantaged	66,007	8,730
Not Economically Disadvantaged	37,688	3,903
Total	103,695	12,633

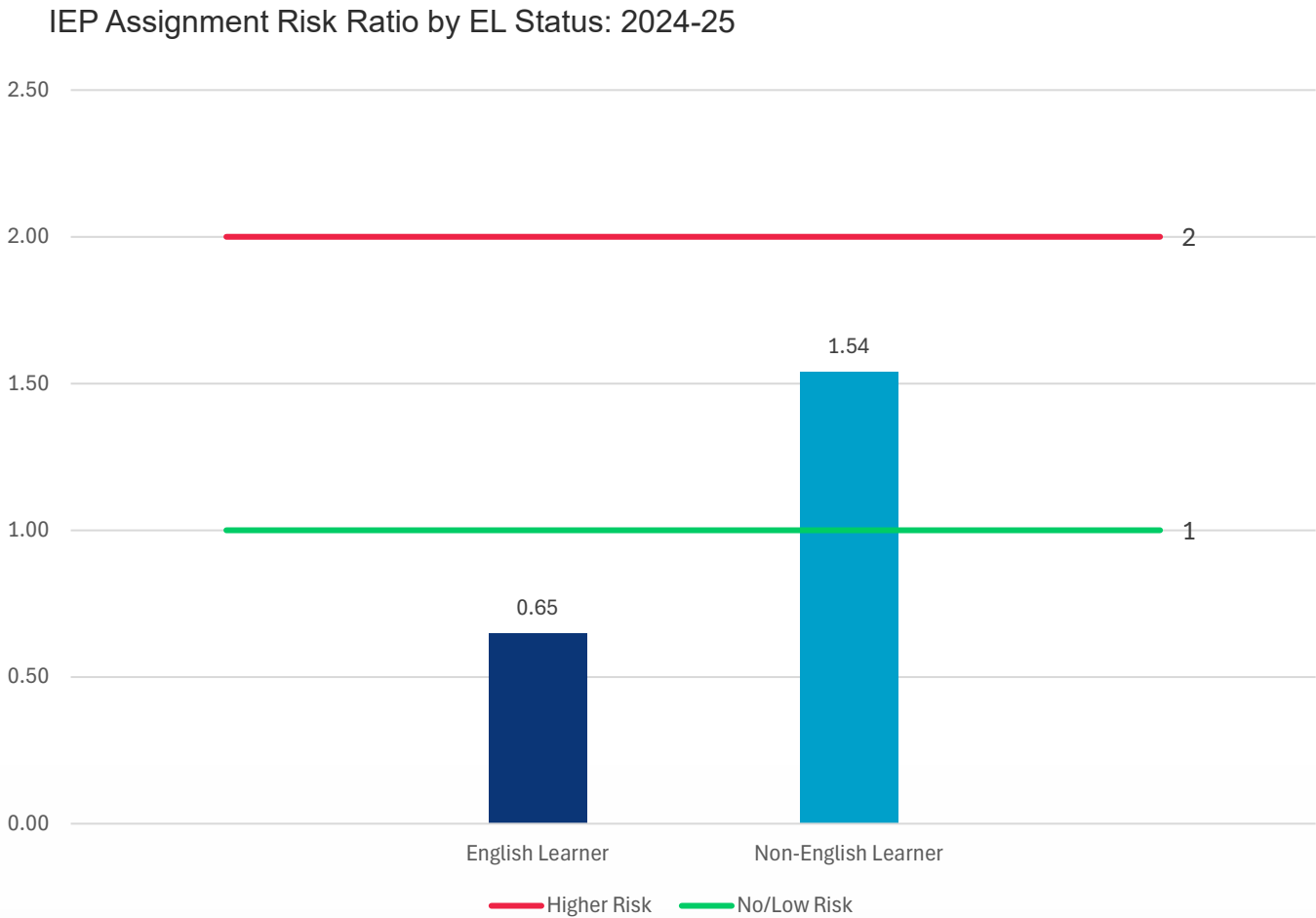
- Economically disadvantaged students are **1.28 times** more likely to have an IEP as all other students in the district.



IEP Assignment by EL Status

Race	All Students	Students with IEPs
English Learner	20,930	1,787
Non-English Learner	82,756	10,846
Total	103,695	12,633

- Non-English Learner students are **1.54 times** more likely to have an IEP as all other students in the district.



Survey of Instructional Staff: Professional Learning

Professional Learning	All	Elementary (PreK-5)	Middle (6-8)	High (9-12)
<i>Total Number of Participants</i>	4,680	2,640	897	1,143
My professional learning is driven by my students' learning outcomes.	73%	77%	72%	67%
My district and/or my school monitors my participation and proficiency rate in professional learning.	69%	72%	66%	64%
I receive consistent and constructive feedback from school leadership.	70%	73%	69%	66%

- Source: Data retrieved from PCG Instructional Staff survey.

Operation & Management Review

Human Resources Department

July 25, 2022

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Operation and Management Review: Human Resources (HR) Department
July 2022

Acknowledgments

The Operations and Management Review the Human Resources (HR) Department could not have been completed without the support of key personnel. PCG wishes to thank the following individuals for meeting with the review team regularly, providing documents and data, and facilitating the project's logistics.

PCG also thanks Executive Director of Human Resources, for her work in gathering data and documents for the review team.

PCG wishes to acknowledge the staff and leadership, who took time out of their busy schedules to talk with our team in interviews and focus groups, and the hundreds of staff who shared their thoughts by completing the online feedback form.

Public Consulting Group LLC

I. INTRODUCTION

The District serves approximately [REDACTED] students and employs approximately [REDACTED] full and part-time employees, both instructional and operational, as well as [REDACTED] temporary workers.¹ The District has [REDACTED] elementary schools, [REDACTED] middle schools (grades 6-8), [REDACTED] traditional high schools, [REDACTED] consolidated alternative/early colleges/vocational campus, and [REDACTED] district-authorized charter schools in its portfolio. [REDACTED] is one of the largest districts in [REDACTED]. Though it remains the [REDACTED] district in the state, has experienced declining enrollment for over a decade.² Over the last five years, saw a 16% drop in enrollment from [REDACTED], compared to the 2% loss in enrollment reported for [REDACTED] as a whole. This decline has prompted the District to launch new strategies designed to engage students and build high-quality schools while also “right-size” its operations amid the continued decrease in enrollment-based school finances. Further, like many school districts nationwide, the impact of the COVID-19 pandemic in has considerably changed school operations and students’ learning. This prompted an increased investment in technology for a 1:1 device program, growing attention on recruitment, retention, and other human capital activities, and a focus on facilities improvements to support student learning.

These factors, along with the anticipated start of a new Superintendent in July 2022, prompted to engage Public Consulting Group (PCG) to conduct an Operational and Management Review of the Human Resources (HR), Facilities, and Information Technology (IT) Departments. This work provides an independent, objective third-party review of the core functions and activities within these departments to determine where should focus on changes to increase the efficiency and effectiveness of its services. The department reviews are a priority of District leadership, including the Board of Education and the Superintendent’s Office. They will be used for planning and prioritization during the Superintendent leadership transition. The Operational and Management Review is being conducted through a phased approach with three separate reports – one for each department under review – issued over three months.

Specifically, the review seeks to answer the following questions:

For each department:

- To what extent does the department have adequate staffing and an organizational structure aligned to fulfill its mission and expected outcomes?
- How is the department viewed by its customers (i.e., school-based and other central office staff), and how do they seek and respond to customer feedback?
- To what extent does the workload volume align with the department’s current authorized staffing levels?
- What are existing performance benchmarks for the department, and to what extent are they being met?

Additional, specific to each department:

Human Resources

- To what extent is the department complying with District Board Policies, Teacher Master Agreement, and Education Support Professionals (ESP)/Executive Professional (ExecPro) Handbooks?
- What staff processes and procedures are used to perform high-level operational tasks?
- What recordkeeping and documentation practices does the department use?

Facilities

- What is the quality and supervision of work performed in-house?
- How are materials requisition, procurement, and deployment on work orders managed?

¹ 2022-23 New Employee Orientation (NEO) Presentation, provided by HR Department

² [REDACTED]

- How are work orders for schools processed and completed within a timely manner? How is quality managed?
- What systems are used to monitor time and effort reporting?
- What procedures are in place to control the use of District equipment, assets, and materials?

Information Technology

- How are software system implementations, upgrades, and maintenance managed?
- How does the department protect information, assets, and system security?
- How does the department managers and prioritize pending technology requests?
- What platforms and systems are used, and how are they supported?

The graphic below, created by the Interim Superintendent and Deputy Superintendent, was created to refocus all central offices and schools on the factors that positively impact students when implemented with fidelity. Understanding the degree to which these factors – the “how’s” - are manifested through the daily work of each Department under review has been a core part of this study.

Graphic Deleted

This report contains the review findings for the **HR Department Review**. The data used in the report are described in the methodology section. The report headers that follow are structured around key functional areas identified in the review. Strengths and limitations are described under each functional heading, and a list of recommendations based on the findings are described at the end.

II. METHODOLOGY

The findings presented below are drawn from an analysis of data from multiple sources. These data are both qualitative and quantitative and were collected using several methods. These include virtual and in-person interviews and focus groups, an analysis of staffing allocations and other data, documents and policies, and an electronic feedback form. These data sources are described in more detail below.

DATA REVIEW

PCG collected and analyzed data from various sources to help understand the processes and structures under the purview of Human Resources. Data include:

- Personnel records (employees hired over the past two years)
- Official grievances
- The District's October 2021 Wellbeing Survey—Site Administrator Feedback
- Annual budgets

DOCUMENT AND POLICY REVIEW

PCG reviewed pertinent documents for information related to structures, programs, policies, and practices to assess the extent to which they are clearly articulated to all relevant stakeholder groups and followed with consistency.

Documents and policies reviewed included:

- Website(s)
- Organizational charts
- Written protocols
- Policy and procedural manuals
- Workflow processes
- District Board Policies, Teacher Master Agreement, and the Educational Support Professionals (ESP)/Executive Professional (ExecPro) Handbooks
- New Employee Orientation materials

FOCUS GROUPS AND INTERVIEWS

PCG conducted confidential interviews and focus groups to collect stakeholder perspectives. Focus groups and interviews were conducted virtually and in person in June and July 2022 with over 130 staff and administrators.

Focus groups were held with administrative departments and school personnel (teachers and administrators separately) from elementary, middle, and high schools. Interviews were conducted with senior-level administrators who make key departmental decisions and other staff responsible for specific departmental tasks. Interviewees also included the Interim Superintendent and other senior level leaders/administrators across departments.

Participants were recruited with support from staff via email invites with a signup link that allowed them to select dates and times that they were available. PCG then sent out calendar invites for the selected times.

Interviews lasted 30-45 minutes, and focus groups were 45-60 minutes in length.

Qualitative data from the focus groups and interviews were analyzed using appropriate and rigorous methods. Data were analyzed by theme consistent with the review goals and research questions. These themes were triangulated with other available data sources to ensure validity.

ONLINE FEEDBACK FORM

An additional data source was an online feedback form developed to solicit information from all staff, including staff who were unable to participate in interviews or focus groups and those who did participate

but had additional thoughts to share. A link to the form was made available by via a link distributed through email from June 13 through July 2, 2022. staff sent an original notice and two reminders to staff to complete the survey in June.

Participants could select one or multiple departments to provide feedback about: Human Resources, Facilities, and/or Information Technology. The form posed four open-ended questions:

- What are the strengths of this Department?
- What are the limitations of this Department?
- What recommendations do you have for this Department?
- Is there anything else you would like us to know about this Department?

Participants were also invited to provide their contact information if they wanted PCG to follow up on their responses.

Overall, we received 216 responses on the form; 124 (57%) focused on feedback regarding the Human Resources Department.

Project staff coded responses by theme and findings regarding Human Resources are distributed throughout the report.

DEFINITIONS

The following terms are defined below to support the reader in understanding the meaning of commonly used language and acronyms included in this report.

Education Support Professionals (ESP) are considered non-exempt employees as defined in the Fair Labor Standards Act and are compensated at an hourly rate. ESPs include individuals employed as a paraprofessionals, food service workers, transportation, technical services, and other skilled trades.

Electronic Requisition (commonly abbreviated as **eReq, ereq, or EREQ**) is an electronic request to fill an open position.

Executive Professionals (ExecPros) are considered exempt, salaried employees. ExecPros include staff in central office leadership roles and other professional roles.

Hiring Manager is any employee overseeing the hire of a staff person. This includes central office staff and school-based staff, including Principals.

Human Capital Management (HCM) is a broader term that includes HRM functions and strategic functions such as analytics and performance management.

Human Resource Management (HRM) focuses on core administrative HR functions such as maintaining employee records and administering benefits.

Post-Offer Pre-Placement (POPP or POPPs) is an objective method to screen applicants for physically demanding positions within the school district. Currently, roles requiring staff to be able to lift 50 lbs. or more are required to complete the POPP before beginning the job.

III. OVERVIEW OF STRATEGY AND CONTEXT

Over the last several years, the Human Resources (HR) Department has experienced changes that have challenged its processes and procedures. These changes include a transition in departmental leadership and staffing, the many disruptions of working through the COVID-19 pandemic, and the workload created by COVID-related vacancies.

MISSION AND VISION

In 2019, the District adopted a new strategic plan with a new mission and vision. The HR Department section of the website provides the following information about how it will support the mission of the District:

FIGURE 1. HR DEPARTMENT'S MISSION AND VISION³

Mission – Our Purpose: What we want our students to leave us with.

The Human Resources Department supports [REDACTED] mission of empowering the whole student to profoundly impact our world by recruiting, employing, and supporting an exceptionally qualified, engaged, and diverse workforce.

Mission Impacts – How we will know we are moving toward our mission.

The Human Resources Department will:

- Strive to be a district of choice for employment throughout the [REDACTED].
- Use adaptive and evolving techniques in hiring and filling the needs of positions with qualified candidates who strive to impact students.

Vision – What our future will look like.

The Human Resources Department's vision is to support the dynamic, collaborative community of energized educators and supportive partners with a passion for continuous learning.

Strategies – The most critical work needed to move toward our mission.

In pursuit of our mission and mission impact, the Human Resources Department is:

- Committed to work to innovate and adapt the evolving workforce.
- Committed to enhance relationships and services with employees, supervisors, stakeholders, employee groups and leaders, through collaboration, communication, employee engagement and job satisfaction initiatives.
- Committed to proactively recruit, retain, and ensure the success of a diverse, qualified, and committed workforce.
- Committed to focus resources to develop initiatives making salaries competitive in the market for Teachers, Educational Support Personnel, and Executive Professionals.
- Committed to being leaders who foster relationships with all employees that are respectful and focused on the value each person brings to the District while providing recognition and honest feedback.

Strategic Delimiters – Things that have tripped us up in the past and we commit not to do going forward.

The Human Resources Department will not:

- Allow past practices to be the measure of future performance and ideas.
- Avoid conflict or difficult conversations, nor engage in problem solving through the lens of blame.
- Engage in initiatives that are misaligned to our mission.

³ Retrieved from:

The ideas of innovation and customer service are woven throughout the HR Department's mission statement, as is the idea that the District will be an employer of choice. While mission statements are generally aspirational, they are also rooted in a reality that staff, a department, or the organization as a whole, believes is achievable. In 2019, the HR Department was prepared to use this mission as its guide and strive toward these goals.

The effects of the COVID-19 pandemic on school districts' human resource departments nationwide, including in this District, have been profound over the past three years. Already stressed before the COVID-19 pandemic began, it is no secret that America's education workforce is in crisis. The ongoing pandemic has challenged schools in many ways,⁴ with

educators, administrators, and support staff [having faced] difficult choices about reopened workplaces, the politicization of pandemic-related mitigations, and challenges to curriculums and even teaching methods. For educators, staff shortages — including for critical support workers and substitute teachers— have only intensified the existing pressure.⁵

In [REDACTED] especially, the race to hire new teachers and staff for the start of the school year is fierce, as the teacher pipeline out of the state's teacher preparation programs is shrinking. The explosive growth and rising housing prices are making it hard for teachers, bus drivers, nutrition service workers, and paraprofessionals to afford to live there.⁶ Enacting 's HR Department mission, established before the pandemic began, has been complicated by these factors. School districts have no choice now but to be innovative, customer service oriented, and highly responsive to potential candidates if they hope to hire and retain them.

While the pandemic changed the reality of the HR Department and schools, many of the concerns shared during focus groups as part of this review were evident many years ago. The Wellbeing Survey administered to site-based leadership in October 2021 also highlighted longstanding concerns with the HR Department, specifically that it is a place of "added stress and inefficiency."

Major themes of note include:⁷

- lack of timeliness and responsiveness,
- ongoing concerns (such as hiring delays, being reactive, not proactive, lack of transparency into hiring timelines) well before COVID,
- poor customer service, and
- biggest detriment to success.

Suggestions from the group were to:

- Address the ineffective/inefficiencies in HR immediately so that they can move forward in a better place, despite staffing shortages,
- Implore this department to change, and
- Have this department be more proactive.

As noted in this survey analysis, "the year after year issues in HR must be resolved if we have any chance to move forward differently in ." Leadership and organizational changes enacted over the past several years in HR were meant to remedy these concerns. However, stakeholders shared that change has been slow and improvements not apparent to many in the District. Similar themes will be noted throughout this report, echoed by focus group participants and a range of school-based and central office staff who provided anonymous survey feedback. With personnel representing the biggest budget item of the school system by far, getting Human Resources "right" is critically important.

⁴ Retrieved from: <https://www.brookings.edu/blog/brown-center-chalkboard/2022/02/18/how-are-staffing-shortages-affecting-schools-during-the-pandemic/>

⁵ Retrieved from: <https://lattice.com/library/top-hr-challenges-facing-the-education-sector-and-how-to-address-them>

⁶ Retrieved from: [REDACTED]

⁷ [REDACTED] 2021 Wellbeing Survey Analysis, provided to PCG.

BEST PRACTICES IN HUMAN RESOURCES

School districts must improve their human capital systems to attract great teachers and operational staff, school. That is the key finding of a major national survey of school districts' human capital practices.⁸ The results of the survey demonstrate that many school districts have not kept pace with the human capital innovations and best practices of other fields, despite the increasing importance of attracting talented teachers.⁹ Recruitment strategies are often hyperlocal, untargeted, or nonexistent and do not strategically focus on diverse candidates or on creating inclusive, supportive environments to retain them. And the longer open positions are delayed in the recruitment process, the smaller the pool of top applicants, especially with hard-to-fill positions such as in special education, math, or English learner support.

Building an effective human capital management (HCM) system requires school districts to be dynamic and to “adapt to new landscapes: shifts in the labor market, new technologies, and advancing communication methods all [requiring] employers to reexamine the way they approach recruiting, developing, and retaining their employees.”¹⁰ Most school districts perform well on traditional human resource functions, such as payroll and benefits administration and compliance with state and federal regulatory requirements. They have clear policies and procedures delineated in collective bargaining agreements on performance and criteria for raises and termination of cause. However, the enforcement of the policies, and an HR Department's ability to capitalize on the use of technology for productivity and efficiencies, are areas where districts generally need improvement.¹¹ Shifting to an HCM approach, from a human resources management (HRM) focus, requires an HR Department to maximize its strategic contribution to the school district and expand beyond its traditional functions. According to a leading HR company:

Human resource management (HRM) focuses on core administrative HR functions such as maintaining employee records and administering benefits.

Human capital management (HCM) is a broader term that includes HRM functions and strategic functions such as analytics and performance management.

In other words, an effective HR Department must align its purpose and activities to the intent and mission of the District, serve its clients (schools and central offices), and be responsive to all stakeholders.

Developed by the American Association of School Personnel Administrators (AASPA), the Human Capital Leaders in Education (HCL) standards outline the competencies that leaders in PK-12 education need to strategically manage human capital (HC) processes at the department, team, or individual level. They serve as a guide for HR Departments to shift from a focus on HRM to one on HCM.¹²

The graphic to the right, and the charts below, show the HCL standards and the assets for each. Fundamental to the daily work of HC leaders is the need to exhibit ethical leadership, infuse diversity, equity, and inclusion in everything they do, and adopt a learning mindset as well.¹³



FIGURE 2. AASPA'S STRATEGY STANDARDS

⁸ The 2016 Center for American Progress's (CAP) surveyed a sample of 108 nationally representative school districts and asked them to describe how they recruit new talent, select whom to hire, induct new teachers, develop teachers' skills, and measure and reward teachers' success in the classroom. Retrieved from: <https://www.americanprogress.org/article/to-attract-great-teachers-school-districts-must-improve-their-human-capital-systems/>

⁹ id.

¹⁰ id.

¹¹ Retrieved from: <https://www.aasa.org/schooladministratorarticle.aspx?id=3552>

¹² Retrieved from: [https://www.bamboohr.com/hr-glossary/human-capital-management-hcm/#:~:text=Human%20resource%20management%20\(HRM\)%20primarily,as%20analytics%20and%20performance%20management.](https://www.bamboohr.com/hr-glossary/human-capital-management-hcm/#:~:text=Human%20resource%20management%20(HRM)%20primarily,as%20analytics%20and%20performance%20management.)

¹³ HCL Standards and Assets. Retrieved from: https://assets.noviams.com/novi-file-uploads/aaspa/HCL_standards_FINAL.pdf

FIGURE 3. HCLE'S STANDARDS AND ASSETS

STRATEGY <i>Targeted actions to achieve goals and improve student outcomes in alignment with the mission, vision, and values of the organization.</i>	PROCESS MANAGEMENT <i>Continuously define, measure, analyze, and improve the way work is accomplished to enhance student, employee, and organizational outcomes.</i>
<ol style="list-style-type: none"> 1. Apply analysis tools to develop department or team strategy. 2. Understand how organizational strategy should influence HC processes. 3. Identify ways that external factors can influence internal processes. 4. Identify different types of organizational structures and how they impact decision making. 5. Support the effective and equitable stewardship of resources. 	<ol style="list-style-type: none"> 1. Use mapping tools to define new and existing processes. 2. Apply process improvement methodologies. 3. Identify key processes indicators (KPIs). 4. Collect valid and reliable data for decision making. 5. Leverage technology to improve performance and increase equity. 6. Support employees through the change process.
RISK MANAGEMENT <i>Targeted actions to achieve goals and improve student outcomes in alignment with the mission, vision, and values of the organization.</i>	EXPERIENCE MANAGEMENT <i>Continuously define, measure, analyze, and improve the way work is accomplished to enhance student, employee, and organizational outcomes.</i>
<ol style="list-style-type: none"> 1. Communicate a working knowledge of laws, policies, procedures, and agreements related to HC practices. 2. Ensure compliance with data governance, privacy, safety, and HC policies. 3. Assess and manage risk to a process or project. 4. Participate in the negotiation of agreements and contracts. 5. Maintain positive labor relations. 	<ol style="list-style-type: none"> 1. Solicit feedback to identify expectations and experiences throughout the employee journey. 2. Provide exceptional customer service to employees, students, and the community. 3. Implement inclusive and equitable policies and practices that meet the needs of a diverse workforce. 4. Manage relationships with partners.

TALENT ACQUISITION <i>The process of identifying talent needs and finding, attracting, and hiring qualified candidates to satisfy those needs.</i>		
Planning and Preparation	Recruitment	Hiring
<ol style="list-style-type: none"> 1. Anticipate and monitor the organization's talent needs. 2. Coordinate with hiring managers to develop candidate profiles. 3. Ensure stakeholders understand their role in the talent acquisition process. 4. Conduct job analysis to identify position requirements and develop accurate job descriptions. 	<ol style="list-style-type: none"> 1. Use the organization's employee value proposition and employment brand to attract talent. 2. Prepare inclusive job postings for target candidate pools. 3. Build internal and external networks for recruiting. 4. Evaluate recruitment outcomes to inform talent acquisition strategy. 	<ol style="list-style-type: none"> 1. Implement a legally compliant hiring process. 2. Understand methods to evaluate applicants and monitor for bias. 3. Extend employment offers and administer post-employment activities. 4. Provide a positive hiring experience to candidates and internal stakeholders.

TALENT DEVELOPMENT <i>Actions that foster employee learning and growth.</i>		
Orientation & Onboarding	Performance Management	Training & Development
<ol style="list-style-type: none"> 1. Facilitate employee-centric orientation processes. 2. Create onboarding experiences that foster inclusion. 3. Prepare supervisors for other employees for their role in orientation and onboarding. 	<ol style="list-style-type: none"> 1. Assist stakeholders with implementing evaluation and support systems. 2. Train evaluators to accurately differentiate performance and use results to inform decision-making. 3. Promote workplace policies. 4. Address employee discipline issues. 	<ol style="list-style-type: none"> 1. Distinguish between training and development approaches and outcomes. 2. Use adult learning and instructional design principles to create or select training and professional development. 3. Evaluate training and development activities.

TOTAL REWARDS <i>All the financial and experiential incentives, rewards, and benefits provided to employees as part of their employment journey.</i>		
Compensation and Benefits	Work-life integration	Career Management
<ol style="list-style-type: none"> 1. Communicate the components of a total rewards program. 2. Conduct job evaluation to determine the relative value of jobs. 3. Administer a transparent and legally compliant compensation system. 4. Follow organizational policies and practices for compensation decisions. 	<ol style="list-style-type: none"> 5. Design jobs to motivate and engage employees. 6. Cultivate a culture that values work-life balance. 7. Provide resources and opportunities that help all employees fulfill their potential. 	<ol style="list-style-type: none"> 4. Communicate processes for transfers, promotions, and demotions. 5. Administer career advancement programs. 6. Manage employee exits.

PCG believes that the District aspires to operate as an HCM, as evidenced by the 2019 mission and vision, but the current structure and processes remain rooted in an HRM mindset and structure. The shift to a highly effective, strategic HCM Department will require a significant focus and leadership invested in creating a positive, proactive, customer service-oriented culture. This report is designed to identify the gaps in the current HR Department and provide steps the District can take to achieve its mission and vision.

IV. FINDINGS

In the section below, information synthesized from the focus groups, interviews, survey data, and document and data review is organized by the seven HCLE standard categories of 1) **Strategy**, 2) **Experience Management**, 3) **Process Management**, 4) **Risk Management**, 5) **Talent Acquisition**, 6) **Talent Development**, and finally, 7) **Total Rewards**. The section begins with a description of the **Structure** of the HR Department.

HR STRUCTURE

The HR Department is one division within the Department of Personnel Support Services (PPS). Other divisions within PPS include:

- Equal Opportunity/ Ombudservices
- Community Engagement/ Engage
- Educator Effectiveness
- Policy and Archival Resources
- Professional Development

The Department of PPS is overseen by an Assistant Superintendent of PPS.

Fall 2021

At the start of the 2021-22 school year, a new [REDACTED] was hired. At the time, HR was allocated for [REDACTED] full time equivalents (FTEs), of which [REDACTED] FTEs were vacant at various points between August and October, in part due to promotions or transitions to other roles within the District (see positions marked "Vacant" or names highlighted in yellow in **Figure 4. HR Organizational Chart Fall 2021**). This organizational chart reflects staff roles after monies from the federal COVID pandemic related Elementary and Secondary School Emergency Relief (ESSER) Fund announcements came out and before HR restructured. Positions funded through ESSER funded roles are circled in blue on the chart.

FIGURE 4. HR ORGANIZATIONAL CHART FALL 2021
Organization Chart Deleted

Summer 2022

Many changes have taken place since Fall 2021 with the new HR Executive Director in place and new staff hired to fill the vacancies. The HR Department is currently allocated for ■ FTEs, of which ■ FTEs are currently vacant (■ vacant and ■ new hires starting 8/1/22). HR leadership reports operating with 2-3 vacancies for most of the 2021-22 school year. In reviewing the organizational chart, it is clear what each person's focus areas are, though there is no delineation on the organizational chart of staff by (recruitment process) phases. See [REDACTED] **Summer 2022** below for more detail.

Graphic Deleted

FIGURE 5. HR ORGANIZATIONAL CHART SUMMER 2022

Organizational Chart Deleted

STRATEGY

Organizational Culture

An organization's culture is based on a set of shared values and often reflects the values emphasized by organizational leaders. According to the Society of Human Resource Management (SHRM), some of the cultural characteristics that distinguish most organizations include the following:¹⁴

- **Commonly shared values.** Emphasizing values like respect, collaboration, attention to detail, and innovation.
- **Degree of hierarchy.** The extent to which the organization values traditional channels of authority.
- **Degree of urgency.** How quickly the organization wants or needs to drive decision-making and innovation.
- **People orientation or task orientation.** Prioritizing people to drive performance and productivity versus prioritizing tasks and processes to make decisions and produce efficiencies.
- **Functional orientation.** Employee divisions by focus and specialty area.
- **Organizational subcultures.** Groups or individuals who may have their own rituals and traditions not shared by the rest of the organization, which can cause challenges or make a positive impact.

Having a thorough understanding of the organizational culture helps employees understand how to work as team, communicate effectively, and make decisions. This is particularly important for organizations experiencing changes in leadership, new staff, and new processes.

As was mentioned above, in Fall 2021, the HR Department experienced changes in leadership across multiple roles, as well as new staff in data and recruitment support roles. The organizational structure was reconfigured with some functions and tasks assigned to different roles. Along with staffing changes, the Department introduced a new, three-phase (i.e., Phase I, Phase II, and Phase III) recruitment process where tasks associated with filling a position are segmented amongst multiple staff (described in further detail in the **Phased Recruitment Process** section). The Department designed the new process to ideally enable greater cross-training of tasks and faster follow-up to hiring managers and candidates.

HR recruiters report positive dynamics and teamwork among their peers, working and communicating well. However, based on feedback from HR staff across multiple roles and levels, overall staff morale is low. Most HR staff reported feeling overworked and reactive to the volume of work, feeling they do not have time or resources to be proactive and strategic. Staff recognize that they have not been able to keep up with the volume of work promptly, thus providing inadequate customer service.

HR staff cited areas that they feel are understaffed, primarily in Phase I, which includes the compensation stage of the recruitment process. Currently, all compensation is routed through one FTE.¹⁵ This puts significant pressure and work on one individual and bottlenecks the recruitment process and hiring timeline. Based on the recruitment process workflow, the tasks in Phase II are accumulating to the point where staff cannot perform work thoroughly. Hiring managers in schools reported that the shift to aligning staff to phases has made it more difficult to know to whom they should go for assistance. In the past, recruiters reportedly handled a candidate's hiring from start to finish, as opposed to the new structure, which breaks these tasks apart so several people can handle them. As a result, hiring managers reach out to many people via email and phone to find out the status of a candidate's hiring. The phased approach has been in full effect since January 2022. This raises the question of the model's efficacy and if the HR Department is staffed adequately to manage the number of eReqs assigned to each person. At this time, the HR Department does not appear to have established performance or productivity standards and, while many HR staff want to maintain a sense of urgency, doing so with the workload volume is a struggle.

Another limitation of the process is the under- and mis-utilization of some HR staff. For example, due to perceptions about system accessibility during the "payroll lockout period" for two weeks per month, the data

¹⁴ Retrieved from: <https://www.shrm.org/resourcesandtools/tools-and-samples/toolkits/pages/understandinganddevelopingorganizationalculture.aspx>

¹⁵ The organization chart shows that, for Compensation, one FTE is a vacant position, and another will be hired to support the Compensation area starting 8/1/22.

entry specialist is unable to perform some of their primary job duties related to completing the steps required in the recruitment process for candidates, thus slowing the timeline to hire. Another example is the HR office assistant, who spends time daily providing technology supports 1-1 to [REDACTED] users (such as password resets) and supplementing Phase II staff to help complete their tasks, rather than being focused on primary point of contact for HR answering phones and filing electronic paperwork in [REDACTED].

Leadership

Strong leadership is crucial for any organization's growth, especially in a school district. Effective leaders provide clarity of purpose, motivate, and guide the mission of the organization or department. Leadership entails having a clear vision, communicating the vision to team members, and organizing the work in an effective and efficient manner.¹⁶ They empower team members to work at their full potential and take responsibility for decision-making. In fact, the importance of leadership is hard to overstate: "at the highest levels, the influence of a leader, good or bad, can resonate throughout an organization. It can motivate teammates and provide them with a purpose and direction. Good leadership can help to establish company culture and developmental direction of an organization."¹⁷ On the other hand, ineffective leadership results in low morale, high turnover, and a decreased ability to have sustained success.

Human Resource leaders are the intermediaries between the executive leadership team and employees, championing causes on the employees' behalf. Their roles should include promoting awareness of best practices and helping guide the organization through changes while supporting major transitions.¹⁸ This requires a strategic vision and effective delivery of services and is especially important right now, as the District onboards a new Superintendent and new Chief Financial/Operations Officer (CFO/COO)¹⁹ over the next few months. Leadership at the chief, executive director, and director levels in HR play a pivotal role in the success, or continued challenges, of the department.

In addition to the HCLE standards and assets, there are many documented best practices for quality HR Leadership.²⁰ They include:

- **Forward-thinking.** Forward-thinking human resource leaders consistently plan for the future. Their goal involves getting ahead of trends and improving the workplace as soon as possible.
- **Innovation.** Innovative human resource leaders design new and unique approaches for attracting, training, and managing talent. They understand that being competitive means being different and trying something no other organization has. Doing so helps the organization retain other employers and attracts the best talent available.
- **Strategy.** Strategic human resource leaders align their creative approaches with the organization's goal. They understand their organization's goals and overall vision and develop projects that work in tandem with these goals to create a more efficient and effective environment.
- **Ethics.** Ethical human resource leaders are sensitive to the large amount of confidential information they hold about employees. They're trusted with everything from medical conditions to performance issues. They manage employees not only by the law's standards but in a way that's best for their organization and their people.
- **Empathy.** Empathetic human resource leaders are necessary for connecting with employees and understanding how to help them. These leaders form bonds and relationships with their employees and listen to them before instating their policies or initiating their solutions. Empathetic leaders understand organizational problems from an employee perspective.
- **Accountability.** Accountable human resource leaders take responsibility for their actions, especially when new changes perform below expectation. Accountable leaders accept circumstances and work even harder in corrective efforts.

Throughout the review, stakeholder perceptions shared with PCG did not always align with these best practices for human resources leaders. While the onset of the pandemic led to a very stressful and trying

¹⁶ Retrieved from: <https://www.managementstudyhq.com/importance-qualities-good-leader.html>

¹⁷ Retrieved from: <https://www.nu.edu/blog/why-is-leadership-important-in-business-administration/>

¹⁸ *An Introduction to HR Leadership*. Retrieved from: <https://www.indeed.com/hire/c/info/hr-leadership#2>

¹⁹ The previous role of Chief Financial Officer is now titled Chief Operations Officer.

²⁰ id.

time for the HR Department, there are lessons to be learned and situations that can be improved and aligned with best practices.

In the fall of 2021, a new [REDACTED] and a new [REDACTED] were named. The appointment of new leaders was in addition to a team of new HR Recruiters that was hired last fall. While these leaders were new to their positions, they were not new to the District. However, many of the HR Recruiters were new to the District and needed training as part of their onboarding experience. The significant changes in HR staff and the on-going pandemic resulted in shifts in the processes and routines of the HR Department. Many reported that changes were not clearly communicated by HR leadership, leading to confusion and uncertainty internally and externally in other departments and schools. Additionally, there is a perception among focus group participants and survey respondents that the District's HR leaders have been less proactive in engaging in strategic initiatives and support but are more reactive to situations, trying to get through another "hiring season." Meanwhile, HR staff are overwhelmed, exhausted, and discouraged, which has led to ongoing staff resignations. In fact, a veteran HR staff person resigned the week the PCG team was onsite in June.

With the change in leadership and staffing, inevitably, mistakes were made. Data entry errors, for example, were cited by various staff. One costly error noted was the considerable overpayment of a contractor due to a miscoding in the HR system. It was through great effort that the District recovered most of the money. Staff perceptions are that HR leadership often does not take ownership of such mistakes. Instead, when mistakes are made, school and department heads, hiring managers, or other staff are often made to feel they are to blame.

As the need for hiring staff grew throughout the pandemic in the district, hiring managers interviewed reported that it was difficult for them to connect with the HR Department. In many instances, school-based staff suggested that voice mail and email would go unanswered for long periods. Many HR staff shared with PCG that they did not have the time to reply to outreach from hiring managers, as it took time away from completing their tasks. Reportedly, an HR staff person could have over 1,000 unanswered emails at times, making it impossible to respond promptly. This type of communication backlog has created frustration for both HR and hiring managers, as many of the emails and voice mails were focused on the hiring process. Focus group participants shared that they believe the HR leadership does not value transparency with hiring managers about the hiring process. The lack of transparency has led to a break in trust between HR and hiring managers throughout the District.

The issue of trust also surfaced within the HR Department. Internal staff shared that it was vital for them to feel trusted by their leadership. Many staff stated that they do not believe their managers and leaders trust them to do their job, citing the level of "micro-managing" within the Department and is embedded into the hiring phases as evidence of this lack of confidence in their capacities. These additional checks could be built into the process to ensure quality, but this is not the perception staff have.

A lack of transparency can foster trust issues in an organization, which appears to be a growing issue within the District. A lack of transparency in HR processes and practices was a prevalent theme across focus group and interview statements from staff in various departments and many roles who noted that they have a limited understanding of how and why personnel decisions are made. They also share a perception that favorable decisions are made or supported by HR leadership more frequently for HR Department members than other departments (i.e., more reclassifications, work from home option).

Changing with the demands of the workforce is critical to having a dynamic and efficient HR Department. Among many staff there was a perception that staff working in other school districts have not experienced the inefficiencies and ineffectiveness at the same level as the District's HR Department. With that in mind, internal staff from various departments, including staff working in HR, have suggested changes that might improve the effectiveness and efficiency of HR leadership. When suggestions for improvement are made however, the perception is that the leadership team is slow to explore the changes, preferring to keep the current structures and practices in place.

EXPERIENCE MANAGEMENT

Customer Service and Communication

One of the roles of HR is to serve employees who are their “internal customers.” These internal customers include all employees of the district and, especially those who are in direct service of district schools. The importance of internal customer service’s role in any organization, including school districts, cannot be overstated. There are multiple benefits to fostering good internal customer service as one of the strategic goals of an HR Department. Benefits of strong internal customer service include:²¹

- Creating clear communication between other departments and human resources
- Increasing employee satisfaction both internally within HR and externally in other departments
- Encouraging a culture of trust
- Recognizing and solving problems quicker
- Improving better customer service to external candidates

Every organization relies on good communication to grow and achieve its strategic goals. Often, HR professionals are the ones who communicate the most critical messages about topics such as onboarding, employee updates, benefits, salaries, policies, working conditions, etc. Therefore, employee communication is an essential part of HR’s role. Effective internal communication is important for developing trust within an organization and significantly impacts employee engagement. HR Departments that fail to prioritize communication and customer service, and ensure that staff connects to the department’s goals, are likely to experience a range of negative outcomes. These include increased employee turnover, inadequate customer service, and lower employee satisfaction and engagement rates. In the district, all of these negative outcomes were mentioned during focus groups and interviews and in survey responses.

In the district, staff perceptions about the customer service experience were mixed. A theme among many focus groups and feedback surveys highlighted experiences where school staff felt a lack of respect and unprofessional behavior in response to their HR inquiries and interactions, even from some of the HR Department leaders. However, central office leaders (higher on the organizational chart) reported that their overall experience is quite professional and supportive. They shared that they are provided with HR staff to support their needs, and hiring new employees is very efficient and effective – an overall positive experience. They acknowledged that their experience with the hiring process differs greatly from school-based hiring managers. School-based hiring managers report frustration that the HR Department does not generally feel the urgency around filling teaching positions, which are providing direct educational and safety support to students in schools.

Across interviews and focus groups and on the feedback survey, some HR Department staff members were recognized by name many times. Participants shared that some individuals are always pleasant, knowledgeable, and helpful in addressing issues or answering questions. They wanted to ensure they were recognized as their efforts were impactful in addressing their needs.

As mentioned above, clear and consistent communication is a key component of high-quality customer service. One of the HR Department’s roles is providing consistent and accurate information when serving customers. Another concern that surfaced among many focus groups and interview participants was that HR may not always communicate accurate and consistent information. The interpretation of policies, for example, may differ based on whom you speak with in the Department. This leads to frustration and misinformation being disseminated throughout. It is believed that part of the consistency issue is the lack of knowledge or understanding of the multiple processes and policies within the Department. This may be due to the high staff turnover, or the lack of training needed for the various duties within HR. They also repeatedly shared that it is difficult to communicate with members in the HR Department.

One reoccurring issue that received a substantial number of participant comments was the inaccessibility of HR staff. Many believe that the HR staff’s inaccessibility has become more pervasive since the pandemic,

²¹ Pickard-Whitehead G. (2021). Internal Customer-Service: What You Should Know. Small Business Trends Essential. <https://smallbiztrends.com/2021/07/internal-customer-service.html>.

in part because they are allowed to work from home. HR leadership stated it is a practice that needs to remain, even after the pandemic, to be competitive when hiring and retaining employees. However, many staff who were interviewed or participated in focus groups feel there are too many people who are allowed to work from home, and the work from home policy perpetuates their inaccessibility. Additionally, participants suggested that even when HR staff work from the office, they have encountered physically locked doors and a less than welcoming environment.

For staff with questions regarding hiring or even problems that need HR support, many said there was an inability to connect with someone quickly in the Department (even when schools needed emergency guidance on personnel issues). Most stated that it is difficult to find someone who answers their phone and that the lack of responsiveness is perceived to be pervasive throughout the HR Department. School based leaders say they can wait weeks, even in situations of emergency school personnel issues, to get a reply, and never receive one. When HR staff was asked how they address communication, it was clear that they were overwhelmed by the volume of inquiries. One staff member shared that answering calls and emails takes so much time, so it is not done regularly. The system is not working for either HR staff or other employees.

However, executive leaders shared that they have not experienced poor communication from HR but know their experience is not representative of others in the district. Executive leaders have a direct line to HR leadership or are provided with contact people who provide information and help to alleviate problems when hiring staff or addressing issues when they arise.

Some HR staff discussed the intranet and the lack of its usage. In many effective and efficient HR Departments, an intranet is an important tool to provide “self-service” that employees use to bypass the need to connect with HR. When asked about the effectiveness of the internal systems, the perception was that it is not used often by staff as it is not “part of the culture”. PCG did not access the intranet, so we could not see what was available and how much could be done through “self-service” by using the site. It does not appear, however, to be an effective or widely used tool to provide key information to staff.

One additional responsibility of an HR Department is to implement inclusive and equitable policies and practices that meet the needs of a diverse workforce. Focus group participants raised concern regarding the lack of multilingual documents available to staff who do not speak or read English fluently. It was stated that the lack of translated documents prevents some employees from understanding HR’s information. Department managers shared that some of their employees need assistance in dealing with HR due to the language barriers. Instead of HR providing the support needed for individuals with limited English, individual departments provide this support.

PROCESS MANAGEMENT

Phased Recruitment Process

As has been noted earlier in this report, in Fall 2021, several new HR recruiters were hired and trained on a new HR internal process for candidate recruitment. This new process went into full effect in January 2022. The new recruitment process is divided into three phases. Each phase has a set of associated job duties and tasks for HR recruiter staff to complete. HR staff tracks the progress of each candidate using an internal SharePoint spreadsheet accessed only by HR staff.

A description of the three phases of the new recruitment process, as outlined in the HR Recruiter training materials, is described below:

FIGURE 6. RECRUITMENT PHASE DESCRIPTIONS

Phase	Job Duties and Tasks
Phase I	<p>In Phase I, eReqs are submitted, approved, and posted. The staffing allocation verification is completed. Job duties for HR recruiters assigned to Phase I include:</p> <ul style="list-style-type: none"> • Point of contact for our principals & hiring managers <ul style="list-style-type: none"> ○ Elementary & FOTC & FNS ○ Secondary & central administration • Resignation through salary request submission to Director of Compensation

Phase	Job Duties and Tasks
	<ul style="list-style-type: none"> • Supports the leave office with the posting screening and scheduling of onboarding for substitute office • Staffing allocations • PaperVision entries • Backup to Phase II and data entry specialist
Phase II	<p>In Phase II, position offers are made and onboarding is completed. Job duties for HR recruiters assigned to Phase II include:</p> <ul style="list-style-type: none"> • Point of contact for applicants <ul style="list-style-type: none"> ○ ESP ○ Teacher • Position offer through start date • Updates status of applicants to shared document for all recruiters to view • PaperVision entries • Backup to Phase I and data entry specialist
Phase III	<p>Phase III (also referred to as “Data Entry Specialist”) encompasses the remaining data entry completion in HR systems for new hires. Job duties for HR recruiters assigned to Phase III include:</p> <ul style="list-style-type: none"> • Data entry completion and office support (compensation) <ul style="list-style-type: none"> ○ Elementary ○ Secondary • Position offer through start date • BOE entries • PaperVision entries • Backup to Phase I and Phase II

Overall, HR staff at multiple levels noted that the three-phase process is still new and would benefit from some changes to improve efficiency. The following section describes the application of the phased approach and its perceived limitations.

Phase I

The hiring process is initiated in Phase I when a hiring manager submits an eReq through PeopleSoft. HR staff review allocations, approve, and aim to get the job processed and posted within 3-5 business days. Staff reported issues with document tracking and the communication with the hiring manager that begins at this stage.

Document Tracking

HR recruiters must review and process documents submitted internally by hiring managers and externally by applicants. The recruiters note that scanned documents, such as transcripts, are often difficult to read, and they have to request new versions. Additionally, HR uses a system called PaperVision for document organization. The system memory clears regularly (cadence unknown to HR staff), and the system is difficult to search, so documents can be hard to find. Once documents are processed, they are saved to an internal S Drive for complete personnel record storage and are accessible to HR staff. The multiple systems used for processing, managing, and storing documents require a lot of staff time to file documents electronically.

Communication

When HR receives an eReq from a hiring manager, HR emails the hiring manager to confirm receipt and let them know it will be processed and posted in 3-5 business days. According to HR Recruiters, this is the last formal standard communication from HR to the hiring manager about the position until a candidate has accepted an offer. During the interim recruitment period between eReq and accepting an offer, hiring managers stated they have little to no information on the status of candidates and that the timeline can far

exceed 3-5 days. According to HR leadership, hiring managers receive daily auto-generated emails from PeopleSoft with links to information on the status of candidates; however, no hiring managers mentioned these emails throughout the data collection for this report. HR staff noted they receive many emails and phone calls from hiring managers with questions about candidate status. The volume of inquiries is so high that it often takes them days or weeks to respond. In some cases, hiring managers report that they do not receive a response at all. HR staff is aware and regretful of this communication delay. The inability of hiring managers to see where candidates are in the process and what action steps HR staff is taking is a significant communication gap and a major source of dissatisfaction amongst staff.

Phase II

Position offers and onboarding coordination takes place in Phase II of the process. HR staff report that the workload in this phase is substantial and is where the process slows down, or “bottlenecks.” Compensation was identified by many stakeholders as an area of slow movement, as well as the length of time it takes for new staff to be onboarded and access systems.

Compensation and Offers

Currently, compensation is managed by one FTE with support from a temporary employee in the Payroll Department (which falls under the Finance Department - not HR) currently. Due to limited staffing, the compensation phase of the hiring process is a challenge for candidates who require compensation assignments before they can be offered the role. Some delays in determining compensation can be attributed to missing transcripts or other documents that the candidate must provide. Furthermore, the recruitment process dictates that only HR can determine the compensation level and verbally make the job offer to the candidate. The hiring managers report frustrations with their inability to contribute opinions as to what compensation is offered to candidates and their inability to call candidates to offer them the job directly. Instead, they must wait for HR to complete these steps. Due to the lag in time at the compensation stage of the recruitment process, many hiring managers noted they have lost out on their preferred candidates and have had to start the process all over again. Compensation is discussed in more detail in the Total Rewards section of this report.

Once the decision has been made to make an offer to a candidate and compensation is determined, HR staff feel the ideal timeline to make this offer is that same day; however, they have such a backlog of offer recommendations to make (sometimes up to 30 or more per day), that they often cannot connect with the candidate promptly. Connecting with a candidate to make an offer can require a series of phone calls and emails as HR staff “play tag” trying to get in touch with candidates. Additionally, each call can reportedly take up to 30 minutes to explain the offer, compensation, and benefits.

Onboarding Steps

A series of onboarding steps must be coordinated and completed for new hires. This includes scheduling the Post-Offer Pre-Placement (POPP) physical and fingerprinting before a formal offer of employment can be made. Additionally, new hires must complete hiring and onboarding paperwork via DocuSign, gain access to the network systems, and participate in an onboarding webinar.

Candidates must supply medical records in advance, schedule time to complete their POPP with a District-designated Physical Therapist (offsite) and go offsite to complete fingerprinting. The logistics to schedule and complete all of these steps can increase the timeline before a formal offer can be made or before a new hire can fully access the technology or data systems they need to start doing their job.

Cross-Departmental Coordination

IT staff who manage network systems for new employees noted there is often a considerable time lag between when the candidate accepts the job, and the paperwork is processed by HR for the new employee to gain access to network systems (such as obtaining a phone number and email address).

Phase III (Data Entry Specialist)²²

The final phase of the process is focused on the remaining data entry into HR systems that must take place to cover the administrative functions of finalizing the new hire. The Data Entry Specialist is assigned to the work in this phase and is cross trained to support some of the functions of Phase I and II when there is a need for supports in those areas due to a backlog of work. The primary issue cited with Phase III was around the “payroll lockout,” described below.

Payroll Lockout

As employees are paid once per month, finance/payroll staff lock the PeopleSoft system for a period to reconcile time entries and close out final data for payroll processing. The reconciliation process involves making sure that pay raises, new hires, and terminations are up to date for payroll. The perception of HR staff is that the lockout period is for two weeks and almost completely limits the ability of HR staff to input personnel data during that timeframe, hindering their ability to keep Phase III of the recruitment process moving. According to finance staff, the lockout period typically never takes two full weeks and is focused on the timeframe from the last business day of the month to the first business day of the following month (essentially one business day turnaround to reconcile final payroll data). Additionally, according to finance staff, the system lockout has no impact on data for new personnel data who are not being paid for work completed that month. For example, suppose a principal is hired on May 15th to start work on August 1st and is not receiving a paycheck until September 1st (after the first full month worked). In that case, the payroll lockout does not impact HR’s ability to input their new hire data at any point before the August payroll lockout period. There are discrepancies in staff perceptions of the purpose of the payroll lockout and how it works. These misunderstandings result in significant work time lost where HR staff could be completing data entry tasks as part of the final steps in the recruitment and hiring process. It was also reported that in years past, IT, Finance, and HR leadership have explored ways to remedy the need for a system lockout during payroll reconciliation, but no sustainable solution has been identified.

Technology Systems

The HR Department uses multiple systems to manage their work and hiring. Overall feedback from HR staff is that the array of systems they use - with PeopleSoft as the core system - is not serving the business functions to the degree necessary to do their work in an efficient and coordinated manner. **Figure 7.** Technology Systems below lists these systems with a description of their primary purpose.

HR has an HR Information Systems (HRIS) Manager, an HRIS Coordinator, and two supporting data specialist roles. The **Jumpstart Committee** was described by staff involved as an opportunity for cross-departmental collaboration, including HR and IT, among the staff who manage the day-to-day operations of the technology systems. The committee meets regularly to discuss system testing and cross-functionality issues. The committee has been a good way for staff to communicate and be proactive about issues that may arise in the systems that would impede staff’s ability to carry out their daily work and operations.

FIGURE 7. TECHNOLOGY SYSTEMS

System Name	HR Department Primary Purpose
PeopleSoft	Front-end applicant interface and back-end applicant and personnel data records. Serves as both Applicant Tracking System (ATS) and Customer Relationship Management (CRM) system.
PaperVision	Document management and electronic filing system
S Drive	HR storage for complete personnel files
Microsoft SharePoint	Internal HR Department applicant tracking

²² In their process training slides, the HR Department includes “Data Entry Specialist” in the title of Phase III.

System Name	HR Department Primary Purpose
DocuSign	New hire paperwork and signatures
WebEx	Video/teleconferencing platform for new hire orientation
Microsoft Teams & Zoom	Video/teleconferencing platforms for internal and external calls
Time Clock Plus	ESP online electric timesheet system
PERFORM	Online evaluation system, electronic communication between employee and supervisor

Many staff gave feedback on the limitations of the current version of **PeopleSoft** in use by the district as a system for managing personnel and hiring. As described above in the Recruitment Processes section, as a front-end ATS, the interface is “not user friendly.” It has reported issues with system lockout and the inability for users to reset passwords without calling staff for support. As a backend CRM system for managing applications, candidates, and personnel, staff noted it is not designed for “modern human capital management,” meaning that the system does not have sophisticated workflow management for applicant tracking. It was reported by staff across finance, IT, and HR that there are also significant challenges with manual data entry errors among HR staff that impact timesheet and payroll issues down the line. Although it is available as a web-based application, according to District leaders it has a “clunky interface” and is “not intuitive.” is not currently using all of the available functions of PeopleSoft, such as workflow and budget management. However, it seems unlikely to District leaders that those functions would solve all of the issues at hand. Staff noted the District has been “putting band-aids on a 30-year-old system” for years and requires something new that better aligns with the District’s human capital management needs. An upgraded PeopleSoft system (Oracle Cloud) has been reviewed and considered by staff in recent years, without any decision about moving forward or considering other system options.

HR staff described **PaperVision** as “hard to find things in” and noted that because it “cleans itself out regularly,” documents go missing if they have not been filed. It does not integrate well with PeopleSoft, according to HR staff, and requires a lot of manual staff time to sort the documents. Additionally, the **S Drive** document storage where complete personnel files are assembled requires staff to create and manage. These manual processes leave room for human error.

The **Microsoft SharePoint** spreadsheet used by HR staff for tracking applicants through the recruitment process was noted as a helpful tool for internal coordination. It allows HR staff to see an applicant’s status but requires information to be entered manually through each of the recruitment phases. As it is an internal coordination tool for the HR Department, it is not accessible by hiring managers or staff outside the Department.

The video/teleconferencing applications used by the district include **WebEx**, **Microsoft Teams**, and **Zoom**. Use of these applications vary by department and individual. Staff report not feeling well-trained or comfortable using the various applications and therefore experience interruptions in communications with internal and external contacts.

As the time entry system for ESP staff, **Time Clock Plus (TCP)** cannot run queries or reports, so staff must submit a request to the vendor. Receiving a response and remedy may take months. Customizations cost extra and historically have taken a long time (one year) to become active. The TCP customer service was described as “not good.” The system has no known functionality for automatic notifications or warnings for personnel who have not completed their required time entry or for supervisors who have not yet approved time entry. This requires HR staff to send out reminders up to three times a week to complete timecards, resulting in e-mail fatigue and HR staff conducting personal phone calls to make sure TCP entries are complete for payroll.

RISK MANAGEMENT

Under the District's current organizational structure, the Risk Related Activities (RRA) Department oversees employee benefits, risk management, and safety services. Risk management primarily focuses on insurance, claims management, and the reduction of losses within the District. HR collaborates with the RRA Department in two areas: pre-hire and onboarding for new hires and incidents related to legal matters or claims. The RRA Department coordinates the pre-employment POPP process for positions required to be able to lift 50 pounds or more to ensure the new employee meets the physical requirements for the role. The Department also reviews the benefits package with new employees during onboarding. Additionally, in some instances involving legal action, district counsel and the Department are brought in to work with HR.

Within any organization, disagreements and conflicts between employees will arise. Successfully navigating these conflicts is important in maintaining a positive working environment and ensuring quality employees are retained. Focus group participants indicated that conflicts are first addressed by bringing the issue to their immediate supervisor. From there, issues are either addressed at that level or escalated to HR for more serious issues. Focus group participants who managed employees indicated they often felt unsupported by HR when addressing employee behavior and conduct, especially related to employees who have worked in the District for a long time. A lack of transparency and follow-through from HR on these issues were also noted by participants.

The District's Nondiscrimination Compliance Coordinator is the primary point of contact for submitting formal grievances related to the following regulations:

- 1) Equal Pay Act of 1963,
- 2) Civil Rights Act of 1964, as Amended,
- 3) Age Discrimination in Employment Act of 1967,
- 4) Title IX – Education Amendments Act of 1972,
- 5) Section 504 of Rehabilitation Act of 1973,
- 6) Pregnancy Discrimination Act of 1978, and
- 7) Americans with Disabilities Act of 1990.²³

In the past two years, fewer than ten formal complaints have been filed with the district. However, there does not appear to be a central repository for this information, making accurate data reporting difficult. To maintain confidentiality, formal complaint details will not be provided in this report.

TALENT ACQUISITION

As discussed above, public education has been hit hard with staffing shortages over the last two years. As noted in Figure 8. Total eReq Data below in **Figure 8. Total eReq Data**, HR experienced a 44% overall increase in electronic requisitions (eReqs), or electronic requests to fill open positions, from the 2018-19 school year to the 2021-22 school year.²⁴ Without a significance increase in HR staffing, this workload increase was also noted by many as contributing to the challenges within the Department. **Figure 9. eReq Data by Position Type** shows a breakdown in the number of hires by type of position from the 2018-19 school year to the 2021-22 school year. While the proportion of each type of role to the overall number of positions filled has remained relatively stable, the total number of positions filled have increased, particularly among ESP staff as well as Teachers and Special Service Providers (SSP).

²³ This list is available on the website. Retrieved from: <https://www.org/Page/11278>. It should be noted that some laws and regulations listed have been amended (i.e., the Americans with Disabilities Act) since their origination dates.

²⁴ 2018-19 and 2021-22 eReq data supplied by HR Department PeopleSoft data reports.

FIGURE 8. TOTAL EREQ DATA

	2018-19 Raw Totals	2018-19% of total	2021-22 Raw Totals	2021-22 % of total	Percent Increase from 2018-19 to 2021-22
New Hires	■	■	■	■	■
Replacement Hires	■	■	■	■	■
Total eReqs	■	■	■	■	■

FIGURE 9. EREQ DATA BY POSITION TYPE

	2018-19 Raw Totals	2018-19 % of total	2021-22 Raw Totals	2021-22 % of total	Percent Increase from 2018-19 to 2021-22
Custodial	■	■	■	■	■
Education Support Professionals (ESP)	■	■	■	■	■
Executive Professionals (ESP)	■	■	■	■	■
Teachers & Special Service Providers (SSP)	■	■	■	■	■
Total eReqs by Position	■	■	■	■	■

In addition to staff turnover and retirements, the district competes with neighboring districts for talent. Despite the recent salary increases, it was reported that 's hiring timeline and salary schedule put the District at a competitive disadvantage compared to neighboring communities.

In both the Wellness Survey administered fall 2021 to school principals and the new data collected for this report, hiring managers across the district expressed frustration with the recruitment process. The primary issues most commonly cited were the amount of time it takes to get someone hired, and the lack of communication about the status of a candidate in the process. Hiring managers stated they believe they are losing out on preferred candidates due to the lack of widespread access to job postings beyond the website (including limited filters to make job searchability easier), gaps in communication with HR, and the timeline between when a candidate is selected by the hiring manager and when HR finally reaches out with an offer and compensation package. Furthermore, HR staff are managing such a backlog of work related to processing eReqs and hiring candidates that they are not using many proactive recruitment strategies to solicit applicants from a diverse range of sources to fill the open roles.

Issues related to training needs, timelines associated with the Teacher Master Agreement, and the applicant experience contribute to the overall slow hiring timeline and lack of strategic, timely recruitment practices. These are discussed in more detail below.

Hiring Timeline

All Roles: Hiring managers described the timeline as taking four to six weeks, sometimes longer. Based on feedback from school staff, this time lag exists regardless of the role being hired. In some cases, hiring managers or district leaders have intervened, submitting calls and inquiries to HR leadership to help move the process along, which in some cases has helped expedite the timeline. Currently, HR tracks data on eReq posting date and hire/start date for every role in the district; however, HR does not currently have reporting capabilities to track the steps that happen on the front end with hiring managers and before the start date. HR leadership is working with IT to develop reporting capabilities to track the date the hiring manager enters the eReq into PeopleSoft to be able to measure the length of time it takes between a hiring manager eReq submission and HR posting that position. HR is also working with IT to track the timeline between when a hiring manager makes a recommendation for employment to the time that HR makes the verbal offer of employment.

The Board of Education has requested that HR set the following measurable goals regarding the hiring timeline:

- 1) 3 business days to post a position (from the time the hiring manager submits the eReq)
- 2) 5 business days to make the verbal offer of employment (from the time the hiring manager makes a recommendation for employment)

Once HR develops these reporting capabilities with support from IT and PeopleSoft programmers, and HR leadership will have more concrete data to understand the full picture and issues associated with lags in the hiring timeline.

Teacher Master Agreement: Due to the Teacher Master Agreement, even if a teacher indicates they plan to retire at the end of the school year, they can change their mind until April 1st. Therefore, an eReq for a replacement teacher cannot be initiated until April 1st. Principals and teachers noted that this timeline falls very late in the teacher hiring season, well behind peer school districts. There is a strong perception that is losing out on candidates applying and accepting a teaching (or other school-based) position elsewhere because of this contract stipulation.

Training

Forms: HR staff report that hiring managers at schools (in most cases principals) often do not fill out the paperwork for the eReq properly. Although the forms are all electronic, many will print and fill them out on paper. According to HR staff, the forms are often incomplete and not caught until later in the process. Additionally, not all hiring managers know which forms to use (there are multiple versions, depending on whether it is a modified eReq or a new original eReq).

Staff roster confirmations: Periodically, HR emails principals in schools a list of all staff they need to confirm is up to date. HR staff report principal's sign-off on the list without any corrections or additions, even when there have been changes. This results in HR having to reconcile out-of-date personnel information, which can sometimes cause delays in hiring approvals.

Daily Email Updates: PeopleSoft auto-generates a daily email sent to hiring managers with information about the status of candidates for each open role. The daily email contains a link with more information also available on the Manager Resources Information Center. As noted above, these daily email updates were not cited by hiring managers or HR recruiters in any focus groups or interviews. The reason for this is unknown, but HR leadership believes the reason could be because the emails are either ignored or recipients do not understand the purpose or function of the emails.

Succession planning: Due to limitations in new staff being able to overlap with their predecessor, even for a few days, the period for training new staff is often limited. This results in a lack of formal succession planning and handoffs between staff who are retiring or leaving their role for another job and the new staff who replace them. This issue was cited by staff across multiple departments and roles in the District.

Applicant Experience

HR posts positions on 's website. Therefore, applicants must go directly to the website to find job openings rather than through career sites such as Indeed. In one case, a hiring manager noted they paid for their open position to be listed on Indeed to help get more applicants. 's uses PeopleSoft for the applicant interface, which requires applicants to complete a new, unique application for every job they apply to. HR staff described the PeopleSoft applicant interface as "terrible" and "not user friendly". The system is not equipped to pull applicant information from LinkedIn or other sites to expedite the application process for candidates. Additionally, according to HR staff, PeopleSoft is not currently equipped for users to reset passwords independently; instead, they must contact the district for user support. HR staff report receiving three to four phone calls daily from applicants requiring support with password resets, which must be routed through IT. Applicants are reportedly frequently "kicked out" of the PeopleSoft system leaving application questionnaire materials incomplete, which requires HR staff outreach to remedy. HR staff report these application issues have been going on "for years." Several hiring managers and HR staff noted that some peer school districts use another system, which allows candidates to complete one profile and apply for multiple positions across districts. This presumably results in an increased number of applicants due to ease of use. 's lack of widespread job advertising and an independent applicant system may reduce the visibility of 's career opportunities, resulting in fewer applicants per role.

Proactive Recruitment

Job Fair: In the summer of 2022, the district hosted a job fair. Stakeholder feedback was positive, and staff agree this was an excellent way to get candidates hired on an expedited timeline since candidates could be interviewed on the spot. One of the limitations of this event was the logistics for getting fingerprinted, which required offsite travel that took hours for candidates to complete.

TALENT DEVELOPMENT

In addition to administering compensation and benefits, the HR Department also maintains the processes for employee performance management for ESP and ExecPros, provides required compliance training, and provides managers with disciplinary and corrective action guidance.

Performance Management

The District utilizes the software system PERFORM for electronic evaluations of all ESP and ExecPros. The evaluation process includes developing a professional growth plan aligned with the District Strategic Plan, a mid-year review measuring progress on the professional growth plan and rubric, and a summative evaluation where a final rating is conducted. The professional growth plan includes developing at least one goal that is specific, measurable, actionable, research-based, and has a timeline (S.M.A.R.T.).

While focus group participants were aware of the performance evaluation process, many indicated the review was procedural in nature only. For example, performance evaluation results are not used for promotions or salary increases and are not used effectively to hold employees accountable. Further, many participants indicated that the performance evaluation rubric was general, unaligned with their position, and not helpful. On the HR website, rubrics are available for multiple ESP positions; however, for ExecPros, only one rubric addresses a specific position, with a general performance evaluation protocol available.

Required Trainings

As part of the onboarding process, all newly hired employees (including rehired employees who have been gone more than one school year), must attend a New Employee Orientation (NEO), currently offered four times per year. NEO is facilitated by the Professional Learning Department. It is an opportunity for new hires to hear an overview of relevant policies that are outlined in the Employee Manual, including:

- Drug and Alcohol
- Tobacco Free
- Personnel Records
- Computer/Internet/Email Acceptable Use
- Staff Ethics/Conflict of Interest/Employment of Relatives
- Dress Code
- Public Conduct on District Property
- Child Abuse Reporting
- Appropriate Use of Physical Intervention
- Grievance Procedures

The orientation also covers an overview of relevant federal laws, including:

- The Consolidated Omnibus Budget Reconciliation Act (COBRA)
- The Health Insurance Portability and Accountability Act (HIPAA)
- The Uniform Service Employment and Reemployment Rights Act (USERRA)
- The Family Educational Rights and Privacy Act (FERPA)

Additionally, information on Performance Evaluations, Equal Opportunity Programs and Ombudsman Services, including non-discrimination and harassment are covered.

TOTAL REWARDS

Salary Schedule Policies and Procedures

operates separate salary schedules for the following position classifications: certified teacher and special services providers, ExecPros, ESP staff, and guest staff/ temporary workers. Each position classification has written policies, procedures, and guidelines related to compensation. The following section discusses compensation policies and practices by position classification.

Certified Teacher and Special Services Providers

The teacher's salary schedule and policies for movement on the schedule are negotiated in collaboration with the District and the [REDACTED] and are documented through the Master Agreement. The Master Agreement serves as the official contract between the District and teachers, outlining working conditions, compensation, benefits, stipends, grievance procedures, and teacher development and evaluation. Movement on the teachers' salary schedule is based on experience steps (experience increment), academic credits (educational increment), and the 14 and 25 years of service increments.

As established in the Master Agreement, teachers receive an experience increment annually and are eligible for an educational increment upon completing sixteen (16) semester hours of credit. For new teachers entering the District, a maximum of fourteen years of teaching experience (within the past 15 years meeting specific criteria) can be taken into consideration for placement on the schedule. The process for requesting an educational increment is documented on the HR website and includes submitting a paper form and appropriate documentation to the HR Department for processing.

Teachers in focus groups were knowledgeable about the salary schedule as well as the process for reclassification. Participants in focus groups acknowledged that teacher salary in [REDACTED] was lower than in surrounding districts, but frequently mentioned that benefits provided by the District exceeded other neighboring districts. Focus group participants and survey respondents also indicated that salary for teachers was an issue when trying to hire new teachers. While more established professionals were appreciative of the District's benefits in lieu of higher salaries, focus group participants believed that new teachers just entering the profession were more likely to focus on the salary versus benefits.

Executive Professionals

The District establishes ExecPro salary schedules with input from the [REDACTED] and are communicated through the Human Resources website. The Executive Professional Meet and Confer Handbook provides general guidelines to executive professionals, including compensation, promotion, and benefits, but does not constitute a contract. Salary ranges for executive professionals were established partly on a market analysis completed in 2014-15. Salary ranges are subject to Superintendent recommendation and Board approval.

For the 2021-22 school year, the salary schedule was updated to reflect fourteen steps, an increase from thirteen. Salary for ExecPros is established by role, pay grade, and years of experience (steps). Placement on the steps for new ExecPros is determined by documented equivalent years of experience, with each step representing two years of service. The maximum amount of previous experience applied to a new ExecPro is ten years, which equates to step 5 on the salary schedule.

While general guidelines for salary ranges and placement on the ExecPros salary schedule are documented and publicly available for review, focus group participants and survey respondents discussed inconsistencies with compensation offers for new ExecPros. Focus group participants who were hiring managers for ExecPro positions frequently mentioned instances where they advocated for a higher salary or higher step placement on behalf of new hires. These participants indicated that some managers had more success with advocating efforts than others, raising concerns of preferential treatment of some hiring managers and new hires over others. Advocating efforts for salary offer increases is one way the hiring process gets delayed, causing additional back and forth cycles between candidates, hiring manager, compensation director, and HR Executive Director.

Education Support Professionals (ESP)

Salary schedules for ESPs are established by the District with input from the ESP Council and are publicly available on the HR website. The ESP Meet and Confer Handbook provides general guidelines to education support professionals, including compensation, promotion, and benefits, and does not constitute a contract. Beginning with the 2021-2022 school year, the ESP salary schedule was revised to combine the previously utilized seven job families into one ESP pay group. However, the twenty-five (25) step compensation system remained unchanged. The updated salary schedule resulted in increased per-hourly pay rate for all positions. For illustrative purposes, for positions at step 1, the increase ranged from one percent to 11.6 percent. Salary for ESPs are established by pay grade, and years of experience (steps). Placement on the steps for new ESPs is determined by documented equivalent years of experience, with each step representing two years of experience. The maximum amount of previous experience applied to a new ESP is up to twenty years, which equates to step 10 on the salary schedule. Depending on the availability of funds, ESPs who have completed a year of service are moved to the next step.

While general guidelines for salary ranges and placement on the ESP salary schedule are documented and publicly available for review, focus group participants discussed frustrations with compensation offers for new ESPs. Focus group participants who were hiring managers for ESP positions frequently mentioned instances where they advocated for a higher salary on behalf of new hires, citing evidence of special experience or licensures, with little success. Focus group participants indicated that applicants for trade positions regularly reject job offers due to the offered salary not being aligned with their experience and specific credentials in their fields, causing the hiring process to restart.

Promotion Policies and Procedures

The Executive Professional Meet and Confer Handbook as well as the ESP Meet and Confer Handbook provide general guidelines on compensation for promotions. The guidance included in both handbooks indicates an ExecPro or ESP's new salary will be based on the employee's new pay grade and will not be less than a three percent increase. ExecPro and ESP focus group participants who had received a promotion or were the manager of an employee who received a promotion indicated frustration with the process for calculating promotion pay. Their frustration is specifically related to the amount of their pay increase and having steps (years of experience) "taken away from them." Feedback from respondents also specifically noted this issue.

While both Meet and Confer Handbooks indicate that a promoted employee's new pay will not be less than three percent of their previous pay, focus group participants indicated that their new salary offers were capped at three percent and confirmed that HR reduced their steps (years of experience) to get a salary increase that was exactly three percent. Focus group participants indicated this was a change in procedure from previous years where they stayed at the same step, but were moved into a new pay grade, leading to pay increases well above three percent. These focus group participants indicated they attempted to advocate to remain on the same step in the new pay grade with HR, were met with resistance and in most instances, and were unsuccessful in securing a pay increase beyond the three percent threshold. There was a perception that the three percent cap was not equally applied to all promotions and depended on who the hiring manager was as well as the Department. Focus group participants and feedback from respondents who received promotions admitted they felt let down by the process, felt unappreciated for their years of service, and frustrated that their new salaries did not align with the increase in the workload and responsibilities of the new position. There was a perception among focus group participants that leaving the District for a position in another district and then coming back would lead to a higher salary commensurate with their qualifications, experience, and the position.

RECOMMENDATIONS

After a comprehensive review of the HR Department, it is clear there are department strengths and promising practices to continue to build upon. The HR staff are dedicated and hard-working and belong to a community that takes pride in their school district. HR Recruiters report good teamwork and collaboration with each other. Events like the recent job fair show promise as a proactive recruitment strategy to expedite filling vacancies and help build a pipeline of interested potential applicants for future roles. This review has also illuminated opportunities for improvement across multiple areas, including strategy, leadership, organizational culture, customer service, technology, and communication. Based on our analysis of the data and documentation examined for this review, we offer the following recommendations to build on the strengths of the HR Department and address areas for improvement.

STRATEGY, LEADERSHIP, AND ORGANIZATIONAL CULTURE

1. Institute a Human Capital Management (HCM) Department

- Reframe the current Office of Personnel Support Services into an HCM Department by developing a strategic and proactive HR mindset and earnestly advocating and providing support for the employees in the organization.
- Begin by developing a vision and framework for the redesign that incorporates these principles: leading with transparency, ethics, integrity, responsiveness, and inclusivity.
- Realign roles/functions within the new HCM to align to the new vision. Specifically, add a unit/positions for talent acquisition to focus on proactive recruitment strategies and employee wellness.

2. Require Leadership Training

- Require all HR staff upon promotion or hired into a leadership position to become certified through the Professional Human Capital Leader in Education (pHCLE) certification program²⁵ or equivalent certification focused on HR professionals in education and to receive mandatory leadership training and coaching.
- At the end of each training opportunity, leaders should develop SMART goals focused on leadership that will be part of their annual performance review. Goals should focus on further developing the characteristics of an effective HR professional: dependability, visibility, responsiveness, communication skills, impactful leadership, human resources expertise, and empathy.

3. Conduct 360 Leadership Assessment

- Have each member of the HR leadership team participate in a 360 Leadership Assessment either through engaging an external organization to manage the process or through purchasing licenses to the evaluation, to determine if their current role will be a good fit for the newly structured HCM Department.

4. Invite Feedback

- Create and routinely use engagement surveys to assess the effectiveness of the HCM Department and obtain a consistent pulse on employee wellbeing throughout the organization.

5. Survey Neighboring Districts

- Identify comparable neighboring districts and interview them to learn what best practices, timelines, and systems they employ specific to organizing around the principles of HCM and recruitment.

²⁵ Retrieved from: <https://www.aaspa.org/hcle-certification>

6. Create eReq/Recruiter Workload Standards

- Conduct a workload analysis for each recruiter, then establish standards for the number of eReqs each recruiter is expected to manage either in each phase and/or across functional areas. After doing so, determine if the phase approach is still appropriate and/or if additional staff are needed to process the hiring volume.

7. Compensation Staffing

- As planned and outlined in the organization chart, hire at least one additional FTE to support compensation. Make sure compensation staff are cross trained to be able to support each other's work during busy periods or when a compensation staff colleague is out of office.

CUSTOMER SERVICE AND COMMUNICATION

8. Build Relationships with School-Based Hiring Managers

- Make a schedule for HR staff to regularly go to schools they support. Meeting staff face to face ensures there is a more meaningful connection, breaks down communication barriers, and encourages a greater focus on schools' needs.

9. Update Staff List

- At least once per year, update the HR staff list with roles and responsibilities for all employees to access throughout the District. This document can be kept on the intranet and will ensure internal staff know who to contact for issues specific to their role or department.

10. Translate Documents

- Hire a translation company to translate documents that all employees must complete or need to access throughout their tenure in the District. All staff should have access to documents they can read and understand in their native/preferred language.

11. Develop Customer Service Expectations and Customer-Service Centric Focus

- Develop HR customer service standards and provide training for all staff. As part of their onboarding, HR employees should receive professional development focused on customer service. HR leadership should train employees on the importance of meeting the needs of all the various customer groups within the District, as they are different.

12. Set Communication Expectations

- Develop an HR communication protocol that sets expectations for written and oral communication (e.g., emails, phone calls, etc.). A response time window should also be included in the document so that school or department staff know when to expect a response to their inquiry from HR.
- Include expectations for communication as part of the onboarding process for new staff. This will ensure the expectations are set and staff have strategies to deescalate situations in an appropriate and professional manner.

DATA, MONITORING, AND TECHNOLOGY

13. Build out Intranet

- Build out the intranet to support a more 'self-service' mindset by providing staff opportunities to access documents such as training manuals on HR processes, etc. in multiple languages, make changes to their user profile, and find answers to frequent asked questions (FAQs) that can eliminate the excessive calls to HR for basic support.

14. Create a Leadership Systems Work Group

- Identify appropriate staff in leadership roles across IT, Finance, and HR to collaborate on technology system needs. Goals of this group should include identifying current system limitations, mapping business needs, and options for upgraded/new replacement system(s). Budget, implementation steps, and timeline for any system upgrades should be overseen by this group so that department leadership that will be using the new system(s) can coordinate appropriately.

15. Upgrade Current or Implement New Customer Relationship Management (CRM) System

- Under the leadership of the Leadership Systems Work Group, identify an upgraded or new CRM system to replace current edition of PeopleSoft to manage HR business needs. Some of the key business needs the system should be able to manage or feed to supporting systems, includes:
 - Applicant interface that can pull information from resume documents and career sites like LinkedIn for a streamlined experience.
 - Applicant tracking with candidate status transparency to HR, hiring manager, and candidates. Information and level of detail available to each party may differ, based on appropriate needs.
 - Hiring manager communication tools that allow all communication about an eReq or a candidate to take place in the system, rather than separate emails and phone calls.
 - Document management and storage (with or without support from a separate system).

16. Develop a Personnel File Storage and Security System

- Determine standards and best practices for storage of personnel-related documents and files. Work with IT to determine the best option for personnel file storage, including exploring secure, cloud-based alternatives to the internal S Drive.

17. Regularly analyze data

- Use data to drive decision making related to staffing and work processes. Data related to eReqs, trainings, personnel issues, and so forth can help to inform department and District leadership on how HR staff spend their time and the HR-related needs of District customers.
- Run reports and monitor these indicators routinely:
 - Retention rates by position and location
 - Absenteeism by position and location
 - Turnover rate by position and location
 - Training completion and effectiveness
 - Internal mobility rate
 - Timeframes between the following key milestones in the hiring process:
 - i. Hiring Manager eReq submission
 - ii. Job posting
 - iii. Hiring Manager recommendation for employment
 - iv. Verbal job offer
 - v. Onboarding completion
 - vi. Hire start date

18. Monitor Personnel Agreements

- Create a system to track all formal grievances and personnel agreements and review for trends regularly.

19. Clarify Payroll Lockout

- The Leadership Systems Workgroup (as described above) should meet to discuss the payroll lockout issue. All relevant HR, IT, and Finance staff should have a common understanding and clear documentation specific to these questions:
 - What are the specific days PeopleSoft is locked by Finance for payroll processing each month?
 - Who are the staff “locked out” during this period?

- What are staff “locked out” from doing during this period?
- What do staff still have access to do during this period?
- Are there alternatives to the current payroll lockout process that should be explored to create efficiencies across these departments?

RECRUITMENT AND HIRING

20. Focus on Proactive Recruitment

- Dedicate staff solely to recruitment efforts, such as building university pipelines and managing internship and apprenticeship programs.
- Invest in publishing career opportunities/job postings on hiring platforms such as Indeed or LinkedIn.
- Analyze position data to create a list of hard to fill jobs and create a recruitment plan for each type of position.
- Conduct job fairs at least 2-3 times per year.

21. Improve the Hiring Process

- Ensure that all forms required for hiring managers to complete (including staff roster confirmations) are fillable forms that can be completed and submitted 100% electronically, with error messages when information is incomplete.
- Renegotiate Teacher Master Agreement to set an earlier date in the school year to allow hiring process for teacher replacements to begin by March in order to be competitive with neighboring districts for talent.
- Develop training resources for hiring managers, including principals, on:
 - Forms and Staff Roster Confirmations: How to complete the eReq forms and staff roster confirmations electronically to ensure completeness and expedite the process.
 - Candidate Status: Develop training resources to help hiring managers understand the purpose of the PeopleSoft auto-generated daily email updates on candidate status and how to access information through those emails or directly through the Manager Resources Information Center.
- Increase the frequency of pre-scheduled onboarding sessions and the resources available during those sessions to expedite onboarding for new hires. Include appropriate staff and resources are onsite at to complete the POPP and fingerprinting to expedite these onboarding steps for new hires.

COMPENSATION, PERFORMANCE, AND EMPLOYEE WELLBEING

22. Promotion Salary Guidelines

- Update current promotion salary guidelines to ensure transparency and equity with how salary increases are determined for all positions. While three percent increases might be appropriate for some positions, the updated salary guidelines should be considerate of additional skills and experiences that might warrant a higher salary increase.

23. ESP New Hire Salary Schedule

- Update ESP salary schedule to allow for more than twenty years of experience be considered for new candidates.

24. Performance Management

- Redesign the performance management system so that it is a supportive tool for employee engagement and development. One option is for leaders to develop a ‘blueprint’ not only for their own growth, but that of their department and school and be assessed on their accomplishments.

25. Performance Evaluations

- Expand performance evaluation rubric to cover additional roles. Use outcomes from performance evaluations to reward high-performing employees and hold non-performing employees accountable.

26. Manage Employee Performance

- Incorporate employee customer service expectations into the performance review. Creating standards and training are important, but unless employees are held accountable for expected behavior, the efforts will not be highly impactful.

27. Wellness Initiatives

- Increase staff mental health resources to support retention and partner with other organizations for wellness type workshops and sessions (e.g., financial planning, stress reduction, meditation, etc.)



Arlington
Public
Schools

STUDENT SUPPORT ACTION PLAN

For Students with Disabilities and
Those Requiring Intervention.



STUDENT SUPPORT ACTION PLAN STRATEGIC GOALS



INCLUSIVITY

Build a community where all students with disabilities are included, respected, and valued, enabling them to access course content, fully participate in learning activities, and demonstrate their knowledge and strengths.



EXCELLENCE

Teach for meaning and mastery using a rigorous, relevant curriculum ensuring equity of access for all students with disabilities.



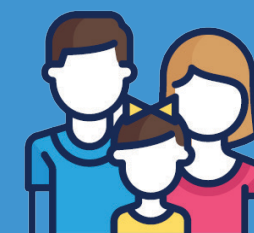
EQUITY

Eliminate opportunity gaps for historically under-represented groups and achieve excellence by providing learning opportunities according to each diverse learner's unique needs.



ACCESS

Hold high expectations for students with disabilities to succeed in advanced level courses with appropriate support.

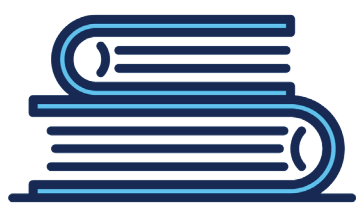


COLLABORATION

Foster partnerships with families, community, and staff to support the success of students with disabilities.

During the 2018-19 school year, Arlington Public Schools (APS) partnered with Public Consulting Group (PCG) to conduct a program review to assess the effectiveness and overall quality of programs and services for students with disabilities and those requiring intervention. At the conclusion of the review a final report was released which included strengths and recommendations for continued improvement. During the fall of 2019, APS continued work with PCG to develop a long-term action plan to address the recommendations included in the final report. The following action plan is the outcome from the action planning process.

The action plan is anchored by key strategic goals that align to the Division's strategic plan and provide vision for the activities included in the action plan. There are four main topic areas that comprise the plan: Arlington Tiered System of Support, Special Education, Section 504, and Organization and Operations. Each topic area includes the commitments that guide the work, the performance indicators that inform how well APS is meeting the commitments, and the strategies that will enable the commitments to be realized. Progress on the action plan will be regularly monitored and documented and outcomes will be communicated to the community.



SPECIAL EDUCATION

OUR COMMITMENTS

- We will...
- Provide access to quality educational opportunities and services for students in the least restrictive environment.
 - Inform all stakeholders of the needs of students with an Individualized Education Program (IEP).
 - Define and implement a service delivery model that allows access for all students to the Least Restrictive Environment (LRE).
 - Use consistent, authentic and responsive two-way communication between staff, family, and the community.

PERFORMANCE INDICATORS

1. At least 80% of students with disabilities will spend 80% or more of their school day in a general education setting.
2. Arlington Public Schools will have a risk-ratio of 1.0 for historically underrepresented groups by least restrictive environment/inclusive setting
3. Arlington Public Schools will exceed the state target for the number of children aged 3 through 5 with Individualized Education Programs (IEPs) attending a regular early childhood program and receiving the majority of special education and related services in the early childhood program.
4. Annually, 80% of goals listed in a student's IEP are mastered by the student as supported by appropriate data.
5. 100% of the selected schools, annually, will implement Specially Designed Instruction (SDI) with fidelity in all educational settings as aligned to the student's IEP.
6. 100% of selected files will meet the criteria for the Golden Thread Threshold.
7. Students in K-5 with IEPs will make at least one grade level gain in reading as measured by the PALS.
8. The achievement for students with IEPs for each content area who score proficient or advance in Reading, Writing, and Math will increase.

9. Students with IEPs in 6-8 will make at least one grade level gain in both reading and math as measured by the Reading and Math Inventory.
10. An increased number of students with IEPs will complete an advanced level course as measured by one of the following completion scores: Advanced Placement (3.0 or higher); International Baccalaureate (4.0 or higher); Honors/ Intensified (Passing grade for High School); Dual Enrolled (Passing Grade for College); Industry Credential (Earn Industry Credential).
11. Students with IEPs in K will make at least one grade level gain in math as measured by the Virginia Kindergarten Readiness Program.
12. Arlington Public Schools will exceed the state targets for the number of children aged 3 through 5 for in the areas of social-emotional skills, acquisition and use of knowledge and skills, and use of appropriate behaviors for those entering below age expectations and those functioning within them.
13. All open public comments received from the Arlington Special Education Advisory Committee (ASEAC) will be resolved or have a formal response within 1 month.

STRATEGIES

- Create a clear vision and comprehensive long-term plan for increasing inclusive practices.
- Expand availability of inclusive Pre-K options and professional learning on the developmental domains and instruction through a UDL approach.
- Adopt guidance on restraint and seclusion, develop a centralized data collection, and expand training on de-escalation strategies.
- Deliver specially designed instruction to meet students' individualized needs.
- Analyze to what extent a student's evaluation supports the existence of a disability and shows a clear connection to the present levels of academic achievement and functional performance statement, identified learner characteristics, inclusion needs, and selected accommodations for instruction and assessment (Golden Thread).
- Prioritize data collection and analysis of IEP goal progress in support of students' growth
- Implement the facilitated IEP process for complex meetings and increase partnership with advisory groups and the Parent Resource Center (PRC) to increase parent trainings on student support processes.
- Determine guardrails for special education accountability at central office and school levels.
- Work with high schools to increase the number of students with disabilities in advanced placement courses.

- Provide schools with the guidance, training, and support necessary to better understand how to implement viable programming and strategies for twice exceptional students.
- Collaborate with the Office of English Learners to support the 5-year plan and establish a co-teaching model for students with disabilities who are also English Learners.
- Have Student Support Coordinators (SSCs) manage transition process and knowledge sharing between schools for rising 6th and 9th graders.
- Continue to utilize the I am Determined Project, and expand available resources, to encourage meaningful student participation during their IEP meeting.
- Provide students access to their IEPs (with parent authorization)



ARLINGTON TIERED SYSTEM OF SUPPORT (ATSS)

OUR COMMITMENTS

- We will...
- Implement a multi-tiered system of support that includes high quality first instruction followed up with flexible models of intervention based on individual student need.
 - Use a consistent Student Support Team (SST) approach districtwide to implement and monitor interventions strategies focused on maximizing student achievement in general education.
 - Implement the evaluation process after all general education tiered systems of supports have been utilized.
 - Use data to determine if struggling students are appropriately referred for evaluations.

PERFORMANCE INDICATORS

1. Students flagged by a screener in English Language Arts (ELA), Math, and/or social-emotional learning (SEL) will have at least one intervention identified, in addition to other services received.
2. School-based staff will administer a progress monitoring tool for each identified intervention at least quarterly.
3. Students in grades K-8 will make at least one year's gain in reading and math as measure by PALS and/or Reading and Math Inventory.

STRATEGIES

- Enhance ATSS Guidance Documents and update the Student Support Manual consistently.
- Establish an ATSS District Leadership Team and consistent School Data Leadership Teams.
- Refine academic and social emotional learning (SEL) intervention guidance and progress monitoring expectations for each tier.
- Anchor existing content area plans and resources within the UDL framework and principles.
- Prioritize data collection and analysis to monitor and accelerate student progress academically and social-emotionally.



SECTION 504

- We will...
- Improve processes and protocols to address disparities in Section 504 identification practices and ensure equitable access to supports.
 - Inform all stakeholders of the needs of students with a Section 504 Plan.

PERFORMANCE INDICATORS

1. Students flagged by a screener in English Language Arts (ELA), Math, and/or social-emotional learning (SEL) will have at least one intervention identified, in addition to other services received.
2. School-based staff will administer a progress monitoring tool for each identified intervention at least quarterly.

3. Students in grades K-8 will make at least one year's gain in reading and math as measure by PALS and/or Reading and Math Inventory.

STRATEGIES

- Develop guidance materials on 504 and Health Plans and cross check a plan sample annually to verify students are being appropriately identified.
- Conduct fidelity checks annually to identify trends related to 504 eligibility and use of Plan accommodations.
- Create guidance for families around what to expect with the Student Support and 504 Eligibility Process.
- Provide students access to their 504 Plans (with parent authorization).



ORGANIZATION AND OPERATIONS

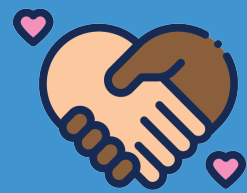
OUR COMMITMENTS

- We will...
- Employ a leadership approach that is collaborative, visionary, and transparent.
 - Implement a resource allocation system that is responsive to the needs of students and supportive of best practices in inclusive schools.



OUR MISSION

To ensure all students learn and thrive in safe, healthy, and supportive learning environments



OUR VISION

To be an inclusive community that empowers all students to foster their dreams, explore their possibilities, and create their futures

ARLINGTON PUBLIC SCHOOLS

GOLDEN THREAD BRIEF

Individualized Education Program (IEP) teams must address the impact of a student's disability on his or her ability to learn and do the kinds of things that typical, non-disabled children do. They must also create a roadmap to that student's success in school. Where's the child heading this year? What will he or she work on, both academically and in terms of functional development? What does the IEP team feel the child can achieve by the end of the year?

WHAT IS THE GOLDEN THREAD?

- For a student with a disability, his or her Individualized Education Program (IEP) team is charged with ensuring that the evaluation supports the existence of a disability and shows a clear connection to the Present Levels of Academic Achievement and Functional Performance (PLAAFP) statement, identified learner characteristics, inclusion needs, and selected accommodations for instruction and assessment.
- This logical progression through the body of evidence, known as the Golden Thread, should connect the pieces to tell a student's complete educational story.



Evaluation

What are the student's characteristics as a learner? What is his/her documented disability? How do the evaluation results inform an instructional plan?

Present Levels

What is the student's present level of academic achievement and functional performance (PLAAFP)? How can access to grade-level standards be ensured regardless of the disability or language barrier?

Measurable Annual Goals

What can the child reasonably be expected to accomplish within one year? What types of instructional tasks are expected of the student in order to demonstrate proficiency in grade-level content? Are goals reasonably rigorous and achievable and address all areas of need?

Accommodations & Modifications

What accommodations are needed for learning in multiple settings, such as home and community? What services and supports are needed for the student to progress in all areas? Are accommodations documented and used as a foundation for classroom instruction and assessment? Does the student demonstrate willingness to consistently use the accommodation?

Progress Reports

What data are being collected on the fidelity of IEP implementation as well as on student progress toward meeting IEP goals? Is the student making progress?

ARLINGTON PUBLIC SCHOOLS DISPROPORTIONALITY AND RISK RATIO BRIEF

As part of the Student Support Action Plan, Arlington Public Schools is using a risk ratio formula to calculate the extent to which students from historically over-represented racial/ethnic groups are at risk for being placed in more restrictive learning environments when compared to other students with disabilities.

WHAT IS A RISK RATIO?

- A risk ratio is a numerical comparison, expressed as a ratio or decimal, between the risk of a specific outcome for a specific racial or ethnic group in a local education agency (LEA) and the risk of that same outcome for all other children in the LEA.
- It is calculated by dividing the risk of a particular outcome for children in one racial or ethnic group within an LEA by the risk of that same outcome for children in all other racial or ethnic groups within the LEA (the comparison group).



HOW IS IT CALCULATED?

Risk ratios for educational setting were calculated by dividing the numerator (the percentage of APS students with the specific placement for the given racial/ethnic group) by the denominator (the percentage of APS students with the specific placement for students not in that racial/ethnic group). The risk ratio was calculated for each racial/ethnic group in relation to the specified placement.

The specific educational settings for which risk ratios are calculated include:

- placements inside the general education classroom 80% or more of the school day,
- placements inside the general education classroom at least 40% and no more than 79% of the school day,
- placements inside the general education classroom less than 40% of the school day, and
- educational placements in a separate setting.

Generally, a risk ratio of 1.0 indicates that children from a given racial or ethnic group are no more or less likely than children from all other racial or ethnic groups to experience a particular outcome (such as placement in a more restrictive setting). A risk ratio of 2.0 indicates that one group is twice as likely as all other children to experience that outcome. A risk ratio of 3.0 indicates three times as likely, etc.

The risk ratio calculated for Arlington Public Schools' Student Support Action Plan is not designed to replicate the Virginia Department of Education's significant disproportionality methodology. The intent of this calculation is to provide a formative data point to assess the extent to which educational placement decisions are impacted by students' race/ethnicity.

WHY SHOULD WE CALCULATE RISK RATIOS?

Several decades of research document that students from certain racial/ethnic groups, particularly Black/African American students, are disproportionately represented in special education programs and are subjected to higher rates of suspension and expulsion and restrictive educational settings. Risk ratios are one way of monitoring this information.

Under the Individuals with Disabilities Education Act (IDEA), states are required to determine whether each LEA has significant disproportionality based on race/ethnicity in the identification of children as children with disabilities, the placement of children in specific educational environments, and the incidence, duration, and the type of disciplinary actions. States are required to use a standard methodology to determine the thresholds above which the risk ratio in each category indicates significant disproportionality.

ARLINGTON PUBLIC SCHOOLS

STATE PERFORMANCE PLAN (SPP) INDICATORS BRIEF

The Individuals with Disabilities Education Act (IDEA) requires each state to report to the public on state-level data and individual school division-level data and to report on whether the state and the divisions met state target described in the state's special education State Performance Plan/Annual Performance Report. School divisions are required to submit information and data for reporting, monitoring, and compliance purposes.

WHAT ARE THE SPP INDICATORS?

- The SPP Indicators are one of the ways in which States measure and publicly report their performance in educating students with disabilities.
- All Local Education Agencies (LEAs) must provide data for the SPP Indicators to their States annually. These data are used to determine the compliance status of each LEA and, in many cases, to select LEAs for participation in the State's annual monitoring process.
- The SPP Indicators are separated into 2 categories:
 - ▶ **Compliance Indicators** measure compliance within the state/district compared to IDEA regulations.
 - ▶ **Results Indicators** measure the performance of students with disabilities.
- States must provide an Annual Performance Report (APR), which summarizes progress on the indicators, to the federal government each year.

HOW DID THE SPP INDICATORS COME TO BE?

- When the Individuals with Disabilities Education Act (IDEA) was reauthorized in 2004, it required States to use quantitative and qualitative indicators to measure performance in the following areas:
 1. Provision of a Free Appropriate Public Education (FAPE) in the least restrictive environment
 2. State exercise of general supervision, including child find, effective monitoring, the use of resolution meetings, mediation, and a system of transition services
 3. Disproportionate representation of racial and ethnic groups in special education and related services, to the extent the representation is the result of inappropriate identification
- Based upon these regulations, the federal Office of Special Education Programs (OSEP) identified 17 indicators to guide States in their implementation of IDEA and in how they report their progress and performance to OSEP itself. States receive a determination rating of Meetings Requirements, Needs Assistance, Needs Intervention, or Needs Substantial Intervention based upon their compliance with, and progress made, on each indicator. This, in turn, allows OSEP to report concrete data back to Congress and to monitor and supervise each State. The Virginia Department of Education (VDOE) also assigns annual determination ratings to school divisions.

WHAT IS RESULTS DRIVEN ACCOUNTABILITY?

Concerned that the achievement and graduation rates of students with disabilities remained low for many years, in 2012 OSEP refocused its accountability system to emphasize achieving improved results for students with disabilities. This new approach is called results-driven accountability—RDA, for short.

In applying the RDA approach to improving results for children with disabilities, each State and school division must now identify what improved results for students with disabilities they want to achieve and what actions must be taken to achieve those results. The SPP indicator data collected has taken on additional importance now that OSEP has moved to the RDA framework, as there are rating points associated with both a Compliance Matrix and a Results Driven Accountability Matrix.

WHAT DO THE SPP INDICATORS MEASURE?

- ▶ **Indicator 1 Graduation.** Percent of Youths with IEPs graduating from high school with a regular diploma.
- ▶ **Indicator 2 Dropout.** Percent of Youths with IEPs dropping out of high school.
- ▶ **Indicator 3A-C State Assessments.** Participation & Performance of Children with IEPs on Statewide Assessments.
- ▶ **Indicator 4 Discipline.** Rates of Suspension/Expulsion.
- ▶ **Indicator 5 5A-C Educational Environment, ages 6-21.** Percent of children with IEPs aged 6-21 served in Educational Environments.
- ▶ **Indicator 6A-B Educational Environment, ages 3-5.** Percent of children with IEPs aged 3-5 by program.
- ▶ **Indicator 7A-C Early Childhood Outcomes.** Percent of preschool children aged 3 through 5 with IEPs with demonstrate improvement.
- ▶ **Indicator 8 Parent Participation.** Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities.
- ▶ **Indicator 9 Disproportionality by Race/Ethnicity.** Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification.
- ▶ **Indicator 10 Disproportionality by Specific Disability.** Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.
- ▶ **Indicator 11 Child Find/Timely Evaluations.** Percent of children who were evaluated within 60 days of receiving parental consent for initial evaluation or a State established timeframe.
- ▶ **Indicator 12 Early Childhood Transition.** Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.
- ▶ **Indicator 13 Secondary Transition.** Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals.
- ▶ **Indicator 14A-C Post School Outcomes.** Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and grouped by Post School programs.
- ▶ **Indicator 15 General Supervision.** Percent of hearing requests that went to resolution sessions that were resolved.
- ▶ **Indicator 16 IDEA Complaints.** Percent of mediations held that resulted in mediation agreements.
- ▶ **Indicator 17 State Specific.** The State's SPP/APR includes a State Systemic Improvement Plan (SSIP) that meets the requirements for this indicator.



Kentucky Department of **EDUCATION**

A Special Report on the Kentucky Department of Education, the Kentucky School for the Blind, the Kentucky School for the Deaf, and the Department Operated Area Technology Centers

July 1, 2025

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MONITORING & CONSOLIDATED MONITORING

This section discusses the Kentucky Department of Education's (KDE) responsibilities associated with the monitoring of school districts and programs. All related activities are discussed below, outside of monitoring for special education, Gifted and Talented, and publicly funded preschool. Monitoring for special education and for Gifted and Talented are discussed in the Exceptional Children section; and monitoring for publicly funded preschool is discussed in the Preschool section. The Office of Continuous Improvement and Support (OCIS) and the Office of Finance and Operations (OFO) are responsible for leading these monitoring activities.

SUPERINTENDENTS' PERCEPTIONS OF MONITORING PROCESSES

Monitoring and audits were one of the most frequent topics of discussion during the superintendent focus groups. A few superintendents also referenced audits in open-ended comments on the superintendent survey. Superintendents primarily spoke in generalities about monitoring and auditing activities writ large, rather than engaging in specifics. The following findings, discussed below, were identified from these focus groups and survey responses:

Annual audits were perceived by superintendents as a burden in terms of the time and effort required.

Superintendents reported that annual audits take an inordinate amount of time, especially for smaller districts. Several superintendents described stress and capacity constraints associated with the consolidated monitoring process. For example, as part of the audit process, districts are responsible for all logistics, including scheduling and securing substitutes for their teachers to meet with auditors. Also related, the volume of monitoring and auditing activities were named by a few superintendents as a burden, and they also expressed that there were too many audits.

Superintendents felt that the district selection process was not grounded in clear data, evidence, or a compelling rationale.

Superintendents shared their opinions that KDE does not provide a clear rationale for selecting a district for monitoring. A few superintendents reported that they were either randomly selected, or that they did not receive an explanation for their district's selection. Superintendents also described examples of times when interactions with KDE, either through support requests or a monitoring visit, led to a subsequent audit.

Superintendents shared that monitoring reports were not helpful tools to support continuous improvement.

Superintendents cited a few different reasons for why they did not find the reports to be useful. Their reasons included: a lack of trust in KDE's legal interpretation of governing law, inconsistency across audit results, and results that hinged on a key word or two.

Superintendents expressed concern that KDE does not have an effective method to determine auditors' conflicts-of-interest and inexperience.

A few superintendents expressed concern that KDE does not take the necessary steps to ensure individuals sent to audit their districts are without bias or conflict and have the requisite experience. They described individuals with little or no experience implementing the program they are monitoring. This includes individuals who previously held the role of classroom teacher.

STATEWIDE CONSOLIDATED MONITORING OF FEDERAL & STATE PROGRAMS

Overview

OCIS coordinates a monitoring process of state and federal programs annually, with the primary goal of ensuring that "certain state and federal funds are used effectively and efficiently to improve educational

outcomes for all students.”²⁵¹ The following eight programs are included in Statewide Consolidated Monitoring (SCM):

- Alternative Education Programs
- State-Funded Preschool Services
- Title I, Part A – Improving Academic Achievement of the Disadvantaged
- Title I, Part D – Children and Youth Who are Neglected, Delinquent, or At-Risk
- Title II, Part A – Teacher and Principal Quality
- Title III – English Learner (EL) and Immigrant Students
- Title IV, Part A – Student Support and Academic Achievement
- Title V, Part B – Rural Education Achievement Program²⁵²

Alternative education programs and state-funded preschool services are monitored to ensure compliance with Kentucky Administrative Regulations. The six Title programs listed above are federally funded programs with corresponding federal monitoring requirements.

The KDE monitoring team selects a subset of districts for SCM using a risk assessment tool. KDE’s OCIS leads all SCM activities. The Manager of the Title I, Part A Support and Improvement Branch and the Point of Contact for SCM are responsible for implementing the process in partnership with leadership from the participating program teams.²⁵³

Risk Assessment & District Selection

7.1 Finding: Approximately 43% of districts have not participated in Statewide Consolidated Monitoring (SCM) in the last decade. As a result, KDE has only completed comprehensive, onsite assessments of about half of all districts in the last ten years.

Annually in August, OCIS conducts a risk assessment process to select districts for monitoring. OCIS uses a risk assessment tool that was developed in accordance with federal regulation 2 C.F.R. § 200.332 and 2 C.F.R. § 200.519. OCIS assesses factors such as time since the last monitoring visit, any unspent federal funds, and years of experience of the district’s program coordinator. Each program team also evaluates districts on program-specific risk factors. For example, the Title II, Part A team considers teacher turnover rates, whether funds were used for class size reduction, and whether technical assistance was required for significant issues on the previous year’s Title II GMAP application.²⁵⁴ Each category is assigned a different point value, and districts with the highest total risk scores are usually selected. Additional consideration is given to whether a district has participated in another type of monitoring in the past two years. In interviews, OCIS staff describe avoiding multiple monitoring visits to the same school district within a particular year.

Program leadership meets to discuss the risk assessment results and typically identifies a list of ten districts and three alternates for OCIS leadership to review.²⁵⁵ Ten districts have been selected for monitoring during each of the last five school years; approximately six percent of public-school districts in the Commonwealth are monitored annually. During the five years prior (2014-2015 to 2018-2019), between five and 14 districts were selected. As seen in Figure 98, Kentucky monitors fewer districts through SCM than Alabama and Mississippi.

²⁵¹ “OCIS DSPI Statewide Consolidated Monitoring Process.” Kentucky Department of Education. March 22, 2024. [Microsoft Word].

²⁵² “Statewide Consolidated Monitoring Process.” Kentucky Department of Education. April 7, 2025. <https://www.education.ky.gov/federal/progs/scmi/Pages/default.aspx>

²⁵³ “OCIS DSPI Statewide Consolidated Monitoring Process.” Kentucky Department of Education. March 22, 2024. [Microsoft Word].

²⁵⁴ “Risk Factors for 2024-2025 Risk Assessment.” Kentucky Department of Education. 2024. [Microsoft Word].

²⁵⁵ “OCIS DSPI Statewide Consolidated Monitoring Process.” Kentucky Department of Education. March 22, 2024. [Microsoft Word].

FIGURE 98: DISTRICTS SELECTED FOR STATE AND FEDERAL MONITORING IN 2023-2024 SCHOOL YEAR BY STATE

States	Monitoring Process	Number Selected for Monitoring	Percentage of Districts Statewide
Kentucky	State and Federal. Districts are selected using a risk assessment tool.	10	6%
Alabama	State and Federal. The top 15% of districts with the highest risk are identified for monitoring.	27	19%
Mississippi	State and Federal. An annual risk assessment determines districts' potential risk of noncompliance and are assigned a risk level of high, medium, or low. The higher the risk level, the more likely they are to be selected for on-site or virtual monitoring.	62	41%
Ohio	Federal. All districts not selected for additional monitoring fill out a self-survey. Some districts are selected for a desk review and ¼ of those districts are identified for additional monitoring on-site.	Approximately 49 for desk monitoring Approximately 12 for on-site monitoring	Approximately 8% are selected for desk monitoring. Approximately 2% are selected for on-site monitoring visits.
Tennessee	Federal. Each LEA is monitored at a tier from 1 (LEAs submit an online instrument), 2 (LEAs participate in virtual monitoring), and 3 (on-site visit) based on a risk analysis comprised of 50 factors.	Not available	100% monitored on one of the three tiers

Source: Data retrieved from State Department of Education websites. The team was not able to identify monitoring participation rates for Florida and Tennessee. Florida uses a Universal Risk Assessment to identify LEAs with high risk for on-site monitoring. Program specific monitoring is provided for all LEAs. More information about Tennessee is provided above.

KDE staff also shared that the individual programs use risk assessment results to identify districts for desk monitoring. Desk monitoring allows for targeted monitoring of districts who were not selected for SCM.

Over the past ten years, a total of 97 districts have participated in SCM; this represents 57% of all districts in the Commonwealth. Eleven of these districts have been selected for SCM twice, and no district has been selected more than twice. The majority of the 11 districts had six or more years between SCM visits. Only three districts had a shorter timeframe of three to four years.²⁵⁶

7.1.a Recommendation: KDE should evaluate the feasibility of more frequent district monitoring, potentially increasing the number of districts monitored annually, depending on staff capacity. All districts can benefit from the process.

²⁵⁶ "Consolidated Monitoring Districts for School Years 2014-15 to 2020-21." Kentucky Department of Education. April 10, 2025. [Microsoft Excel].

7.2 Finding: The risk assessment and district selection process for SCM is not transparent to districts and other stakeholders. The risk assessment tool is not publicly available, and this lack of information casts doubts on the selection process.

While a few examples of risk factors are listed on the KDE website and in district-facing documents, district staff are unable to look up the comprehensive list that informs SCM selection. In focus groups, superintendents reported that KDE did not provide a clear rationale for their district's selection for monitoring. Superintendents shared that selection felt random and not grounded in evidence.

As a comparison, the Mississippi Department of Education shares a full list of risk assessment indicators used to determine a district's annual risk level. They also detail the point system used to identify a district as low, medium, and high risk.²⁵⁷

7.2.a Recommendation: KDE should clearly explain to district leadership the reasons for selecting a district for monitoring. This includes sharing the last time the district participated in SCM and clearly communicating when monitoring is mandated by state and federal law. KDE should also publish the risk assessment tool on its website, as providing the risk assessment tool would address superintendents' concerns that districts are randomly selected for monitoring.

7.3 Finding: The names of districts selected for SCM are not publicly available until the end of the monitoring process.

Districts are notified in October of their selection for SCM; however, district names are not published until the conclusion of SCM. This practice reduces public transparency. For the 2024-2025 school year, district names were published on April 7, 2025.²⁵⁸

7.3.a Recommendation: KDE should publish the list of districts selected for monitoring in the fall once district leadership has received official notice.

7.4 Finding: Risk assessment results are not used to strategically inform the technical assistance process. A district's risk rating is used to determine whether it is selected for monitoring. The risk rating is not utilized beyond this step.

As a comparison, the Mississippi Department of Education describes a focused technical assistance approach on its website. Districts who are identified as medium or high risk during their annual risk rating process receive more focused technical support.²⁵⁹

7.4.a Recommendation: KDE should use risk assessment results to tailor technical assistance for each district. KDE should also employ a more holistic monitoring and technical assistance strategy to provide tiered support to districts.

KDE Staff and District Training

The Title I, Part A Branch Manager and Consolidated Monitoring Point of Contact lead an annual training in late September for all KDE staff members participating in SCM. The training reviews the goals of monitoring, roles and responsibilities, implementation tools, and reporting processes. Relevant district-level

²⁵⁷ "Compliance and Monitoring." Mississippi Department of Education.

<https://mdek12.org/federalprograms/compliance-and-monitoring/>

²⁵⁸ "2024-25 Consolidated Monitoring Process." Kentucky Department of Education.

<https://www.education.ky.gov/federal/progs/scmi/Pages/2024-25%20Consolidated%20Monitoring%20Process.aspx>

²⁵⁹ "Compliance and Monitoring." Mississippi Department of Education.

<https://mdek12.org/federalprograms/compliance-and-monitoring/>

staff then participate in a virtual training where they discuss the schedule, evidence submission, and reporting processes.²⁶⁰

District Visits

Superintendents are notified of district selection in early October. In November and December, districts submit evidence into SharePoint folders prior to their onsite visits. Onsite visits occur between January and May.²⁶¹ District Title I Coordinators typically serve as the point of contact and are responsible for scheduling and logistics. The visits typically last one to three days, depending on district size. Each program team conducts interviews aligned with its processes and monitoring tools, and it also sometimes concludes the visit with exit interviews to share initial observations, at the discretion of the individual program.²⁶² According to staff interviews, all individual programs are assessed during SCM regardless of the individual risk rating. The team reviewed internal OCIS process documents and found evidence of clear role responsibilities, processes, and timelines associated with district visits.

Reporting and Follow-Up

Two types of reports are shared with districts at the conclusion of SCM – an individual program report is provided eight weeks after a visit, and a consolidated report is issued 12 weeks after a visit. The monitoring team holds internal debrief meetings to discuss trends across programs and establish consistency across findings.

Individual Program Reports

7.5 Finding: The team did not observe evidence of a unified approach to tracking or monitoring outcomes of districts who have participated in SCM.

The individual program reports include a summary of the SCM process and related actionable findings. Actionable findings include items that the district is not currently doing that are required under the law. After reports are delivered to districts, OCIS staff collect corresponding evidence related to districts' actionable findings to ensure compliance.

The team reviewed a sample of 14 individual program reports. They contained the following elements:

- Summary of program strengths
- Specific findings from monitoring, and actions required by the district to address non-compliance
- Program recommendations (districts are not required to complete these and KDE does not track them)

According to interviews with KDE staff, each program team logs and tracks findings independently. In some cases, program consultants independently track the actionable findings and upcoming due dates for their portfolio of districts rather than using a team-wide tracking system.

7.5.a Recommendation: KDE should establish a data repository to centrally track monitoring outcomes and guide future technical assistance and monitoring efforts.

This data repository could include documented strengths, areas for improvement, actionable findings, and recommendations. Deliverables and timelines for districts' corrective action plans should also be stored in a way that allows for systematic tracking and follow-up. A KDE-wide repository will ensure that all monitoring outcomes are stored in one central location, rather than individual spreadsheets.

Consolidated Reports

The consolidated monitoring reports typically highlight a handful of Effective Practices and Opportunities for Improvement. Each Opportunity for Improvement includes a corresponding Common

²⁶⁰ "OCIS DSPI Statewide Consolidated Monitoring Process." Kentucky Department of Education. March 22, 2024. [Microsoft Word].

²⁶¹ Ibid.

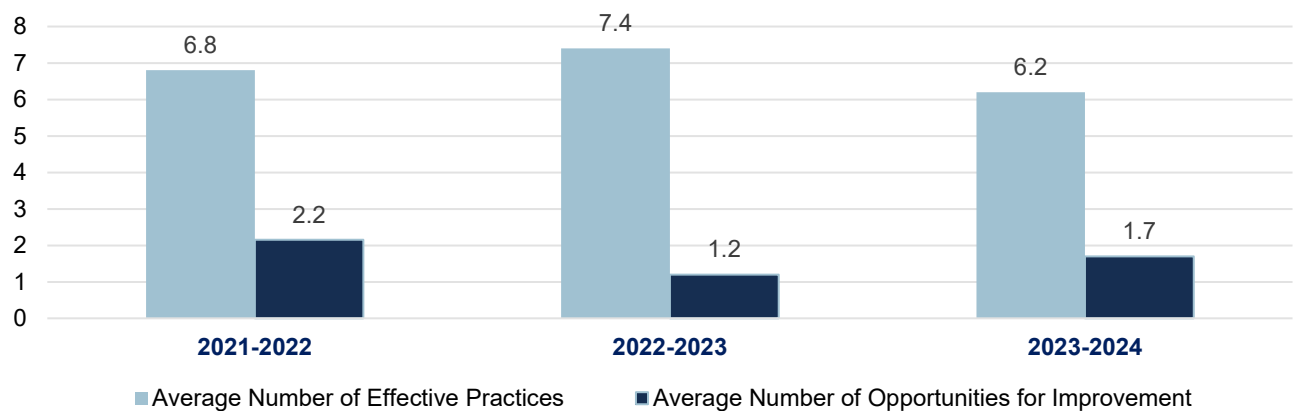
²⁶² Ibid.

Solution/Recommendation. According to interviews with KDE staff, districts are not required to implement these recommendations – they are only required to implement the actionable findings from the individual program reports. Recommendations are issued in places where a district has evidence to show that it is meeting requirements, but its practices could still be improved. Consolidated reports from the previous three school years are published on KDE’s website. KDE staff shared that reports have been published on KDE’s website for several years. Effective Practices and Opportunities for Improvement fall under one of the following ten categories; these categories can be associated with any of the programs:

- Community
- Parent and Family Engagement
- Student Services and Plans
- Finance
- Policies and Procedures
- Professional Development
- Leadership
- Communication
- Culture and Climate
- Equity Initiatives

7.6 Finding: The consolidated monitoring reports highlight significantly more Effective Practices than Opportunities for Improvement. Given that the core function of monitoring is to mitigate risks and help districts improve, the team expected to observe more Opportunities for Improvement and Recommendations. The reports are unable to help districts improve if they rarely mention Opportunities for Improvement.

FIGURE 99: AVERAGE FREQUENCY OF EFFECTIVE PRACTICES AND OPPORTUNITIES FOR IMPROVEMENT IN CONSOLIDATED MONITORING BY YEAR



Source: Data retrieved from Kentucky’s Statewide Consolidated Monitoring Process Reports, 2021-2024.

As illustrated in Figure 99, the team also analyzed the number of Effective Practices and Opportunities for Improvement listed in each consolidated monitoring report from 2021-2022 to 2023-2024, and found that on average, reports included 6.8 Effective Practice and only 1.7 Opportunities for Improvement. This difference is especially apparent in the 2022-2023 reports, in which reports included an average of 7.4 Highlights of Effective Practice and 1.2 Opportunities for Improvement.

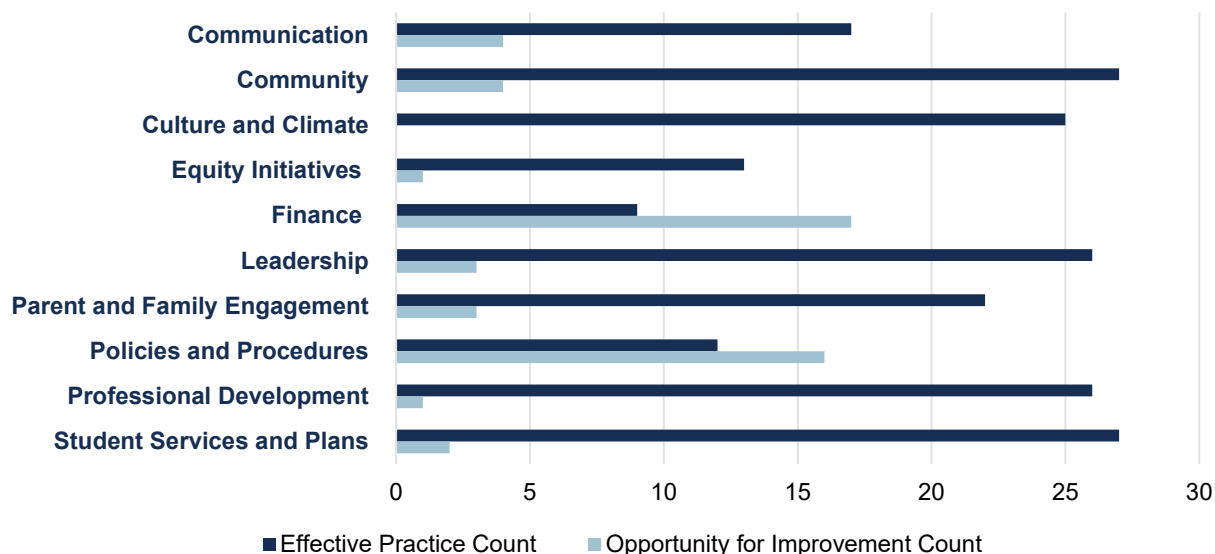
This discrepancy raises questions about the overall effectiveness of the reports for supporting continuous improvement efforts.

7.6.a Recommendation: KDE should offer tailored, constructive feedback to districts to promote continuous improvement in consolidated monitoring reports. Develop reports that prioritize providing applicable, actionable feedback to districts.

7.7 Finding: The SCM team produces a consolidated report for each district it monitors. However, the recommendations use stock language and are not tailored to districts.

The team reviewed the consolidated monitoring reports from 2021-2022, 2022-2023, and 2023-2024 to assess trends in both Effective Practices and Opportunities for Improvement across these ten categories. As shown in Figure 100, across the thirty reports, Community, Student Services and Plans, Professional Development, and Leadership were most often listed as an Effective Practice; approximately 90% of all reports included these. Descriptions of Effective Practice often made specific references to programs or staff that were instrumental in the district's success.

FIGURE 100: FREQUENCY OF EFFECTIVE PRACTICES & OPPORTUNITIES FOR IMPROVEMENT IN CONSOLIDATED MONITORING REPORTS, 2021-2022 TO 2023-2024



Source: Data retrieved from Kentucky's Statewide Consolidated Monitoring Process Reports, 2021-2024.

Finance, and Policies and Procedures were most frequently identified as Opportunities for Improvement; more than half of all reports included these. Like Effective Practices, the description of the Opportunities for Improvement detailed specific district activities. However, the associated recommendations were often very similar across school districts, with some specifics shared based on unique challenges and situations. In interviews, KDE staff shared that they use a common document as a source of recommendations to ensure consistency in wording across reports.

7.7.a Recommendation: KDE should ensure all recommendations are tailored to the local context of each district. Assess whether using the common document hinders the development of district-specific recommendations.

Evaluation & Planning Activities

Each summer, the Title I Support and Improvement Branch leads a process to assess what worked well and what could be improved. As part of this process, they review the results of an anonymous feedback survey that is distributed to monitored districts each year. They also hold debrief meetings with each program team. They then create work groups in places where improved processes are needed.²⁶³ Based on the team's review of internal OCIS process documents, it is evident that the SCM team considers ways to improve processes on an annual basis.

²⁶³ "OCIS DSPI Statewide Consolidated Monitoring Process." Kentucky Department of Education. March 22, 2024. [Microsoft Word].

OTHER OFFICE OF CONTINUOUS IMPROVEMENT & SUPPORT MONITORING

Overview

The Office of Continuous Improvement and Support also engages in monitoring for the below programs outside of the consolidated monitoring process. All of these are federal programs with federal monitoring requirements, except for Nontraditional Instruction (NTI).

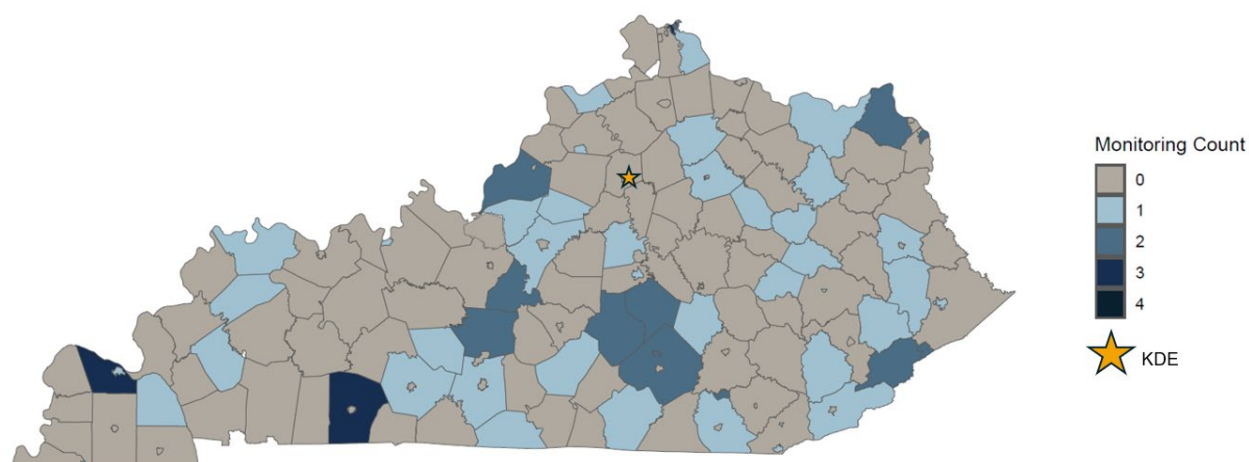
- ESSER
- Title IX, Part A – McKinney-Vento Homeless Assistance
- Title IV, Part B – Nita M. Lowey 21st Century Community Learning Center Programs
- Nontraditional Instruction (NTI)
- School Improvement Funds
- Title I, Part C – Migrant Education Program

In interviews, KDE staff members shared that, in most cases, the relevant program consultant(s) for these programs are responsible for all technical assistance and monitoring activities for all, or a subset, of districts across the Commonwealth.

7.8 Observation: Twelve percent of all districts participated in two or more monitoring processes led by OCIS in the 2023-2024 school year.

A total of 83 districts were monitored by OCIS through SCM or the six programs listed above during the 2023-2024 school year; this represents 48% of all districts in the Commonwealth. Ten districts were selected for SCM, and 73 additional, unique districts participated in other OCIS monitoring.

FIGURE 101: 2023-2024 OCIS MONITORING BY DISTRICT



Source: Data provided by Kentucky Department of Education, “2010-Present Non-Traditional Instruction Schools Monitored,” “Districts monitored for ESSER in 2023-24,” “McKinney-Vento Districts Monitored,” “Migrant Districts Monitored in School Year 2023-24,” “School Improvement Funds Monitoring,” and “Title IV, Part B Monitoring.” Additional data retrieved from Kentucky’s Statewide Consolidated Monitoring Process Reports, 2021-2024. Map retrieved from KYGovMaps Open Data Portal, “KY School Districts,” retrieved from <https://opengisdata.ky.gov/datasets/kygeonet::ky-school-districts/about>.

As seen in Figure 101, of the 22 districts that participated in more than one OCIS monitoring activity during the 2023-2024 school year, 59% were monitored for compliance with Title IV, Part B, and 55% were monitored for compliance with NTI.

FIGURE 102: COUNT OF DISTRICTS PARTICIPATING IN MULTIPLE OCIS MONITORING ACTIVITIES, 2023-2024

Monitoring Activities	Number of Districts
SCM and one other program	3
Two monitoring programs (not including SCM)	14
Three monitoring programs (not including SCM)	4
Four monitoring programs (not including SCM)	1

Source: Data provided by Kentucky Department of Education, “2010-Present Non-Traditional Instruction Schools Monitored,” “Districts monitored for ESSER in 2023-24,” “McKinney-Vento Districts Monitored,” “Migrant Districts Monitored in School Year 2023-24,” “School Improvement Funds Monitoring,” and “Title IV, Part B Monitoring.” Additional data retrieved from Kentucky’s Statewide Consolidated Monitoring Process Reports, 2021-2024.

Both SCM and Title I, Part C monitoring occurs in the spring. During the 2023-2024 school year, no districts were monitored for both programs. Elementary and Secondary School Emergency Relief (ESSER), Title IX, Part A, and NTI monitoring all occur at the end of the school year. During the 2023-2024 school year, six districts were monitored for at least two of these programs.

- 7.8.a Recommendation:** OCIS should strategically coordinate district selections to minimize capacity strain. Evaluating the timing and calendar of monitoring activities will ensure site visits are appropriately spaced.

Elementary & Secondary School Emergency Relief

KDE is required to monitor the implementation of this federal program. The process includes a review of districts’ ESSER Plans, programmatic implementation and outcomes, and the fiscal management of their

ESSER III funds.²⁶⁴ Monitoring occurs in June. Selected districts are required to complete a self-evaluation, as well as submit a MUNIS expenditure report and other documentation prior to the site visit.²⁶⁵ Fourteen school districts were monitored in the 2023-2024 school year.²⁶⁶

Title IX, Part A – McKinney-Vento Homeless Assistance

This federal program “supports homeless youth by promoting educational success for students who are experiencing homelessness.”²⁶⁷ This program is managed by the Community Engagement and Support Branch within the Division of School and Program Improvement. Districts are tasked with submitting McKinney-Vento data to KDE at the end of the school year.²⁶⁸ During the 2023-2024 school year, 14 districts participated in monitoring.²⁶⁹

Title IV, Part B - Nita M. Lowey 21st Century Community Learning Center Programs

This federal program supports the “creation of community learning centers that provide academic enrichment opportunities during non-school hours for children, particularly students who attend high-poverty and low-performing schools.”²⁷⁰ The Community Support and Engagement Branch within the Division of Student Success oversees all programmatic and monitoring activities for Title IV, Part B. According to internal KDE documents, programs are selected for monitoring based on the grant cycle, performance, or through an in-house risk assessment. Like other monitoring activities, the process entails uploading evidence and an on-site visit. Reports are shared with program and school leadership within two weeks, and they have 60 days to submit evidence for any actionable findings. During the 2023-2024 school year, 19 districts were monitored.²⁷¹

Nontraditional Instruction

KRS 158.070 establishes the use of, up to the equivalent of, ten NTI days per school year when a school district is closed for health and safety reasons. Districts must have nontraditional instruction plans approved by the Commissioner of Education to be eligible. The Division of Innovation within OCIS oversees all aspects of NTI, including monitoring.²⁷²

A sample of districts are selected annually for end-of-year monitoring. In the 2023-2024 school year, 37 districts were monitored.²⁷³ Documents provided by KDE indicate that its goal is to monitor, within five years, all districts that leverage NTI days. Approximately 34 districts would need to be monitored annually to meet this objective. Selected districts are required to upload artifacts for each NTI day utilized. Artifacts required include:

- Teacher assignments and paired completed student work from various core content courses and electives for each grade (K-12)

²⁶⁴ “ARP Monitoring Checklist for Reviewers.” Kentucky Department of Education. March 24, 2025. [Microsoft Word].

²⁶⁵ “ARP-ESSER monitoring process.” Kentucky Department of Education. March 24, 2025. [Microsoft Word].

²⁶⁶ “Districts monitored for ESSER in 2023-2024.” Kentucky Department of Education. April 10, 2025. [Microsoft Word].

²⁶⁷ “Title IX, Part A - Education for Homeless Children and Youth.” Kentucky Department of Education. March 21, 2025. <https://www.education.ky.gov/federal/progs/txc/Pages/default.aspx>

²⁶⁸ “Chapter Thirteen: Data Collection & Requirements.” National Center for Homeless Education. <https://nche.ed.gov/homeless-liaison-toolkit/>

²⁶⁹ “McKinney-Vento Districts Monitored.” Kentucky Department of Education. April 10, 2025. [Microsoft Word].

²⁷⁰ “Nita M. Lowey 21st Century Community Learning Centers (Title IV, Part B).” U.S. Department of Education. <https://www.ed.gov/grants-and-programs/formula-grants/school-improvement/nita-m-lowey-21st-century-community-learning-centers>

²⁷¹ “Title IV, Part B Monitoring.” Kentucky Department of Education. April 10, 2025. [Microsoft Word].

²⁷² “Non-Traditional Instruction.” Kentucky Department of Education. March 21, 2025. <https://www.education.ky.gov/school/innov/Pages/Non-Traditional-Instruction.aspx>

²⁷³ “2010-Present Non-Traditional Instruction Schools Monitored.” Kentucky Department of Education. April 10, 2025. [Microsoft Excel].

- Teacher participation numbers retrieved from Infinite Campus
- Student participation numbers retrieved from Infinite Campus
- Responses to end-of-year monitoring questions²⁷⁴

During the 2025 legislative session, House Bill 737 was introduced to amend KRS 158.070 to remove the NTI authorization; it was still in committee when the legislative session ended.²⁷⁵ House Bill 241 was also introduced to grant additional NTI days to account for weather disruptions during the 2024-2025 school year and it became a law without the governor's signature.²⁷⁶

School Improvement Funds

Federal law requires KDE to reserve a portion of its Title I allocation to “assist LEAs [local education agencies] that serve schools implementing comprehensive support and improvement plans or targeted support and improvement plans under ESEA section 111(d).”²⁷⁷ The District 180 Branch within the Division of School and Program Improvement manages the School Improvement Funds financial monitoring process. Approximately 30% of eligible schools are monitored annually based on a risk assessment process. During the 2023-2024 school year, 14 schools across eight districts were monitored.²⁷⁸ According to internal KDE documents, monitoring visits happen between October 15 and December 15.²⁷⁹ More information about KDE's responsibilities related to school improvement is found in the Statewide Accountability & Assessments section.

Title I, Part C – Migrant Education Program

This federal program provides “supplementary education and human resources services to highly mobile children up to and through age 21.”²⁸⁰ The English Learners, Migrant and Neglected Students Branch within the Division of School and Program Improvement is responsible for Title I, Part C program management and monitoring. As demonstrated in Figure 103, during the 2021-2022 school year, the Commonwealth had 3,808 migrant students for the regular school year and 2,943 for summer school. KDE staff shared that this population size is relatively stable, but the numbers were unable to be confirmed as the data from the three most recent school years was not available at the time of publication.

During the 2023-2024 school year, nine districts were monitored.²⁸¹ Like other OCIS monitoring, a risk assessment is used to select districts, and one-day monitoring visits take place in the spring (typically in February and March).²⁸²

²⁷⁴ “2010-Present Non-Traditional Instruction Schools Monitored.” Kentucky Department of Education. April 10, 2025. [Microsoft Excel].

²⁷⁵ “House Bill 737.” Kentucky General Assembly. February 27, 2025.

<https://apps.legislature.ky.gov/record/25rs/hb737.html>

²⁷⁶ “House Bill 241.” Kentucky General Assembly. March 27, 2025.

<https://apps.legislature.ky.gov/record/25rs/hb241.html>

²⁷⁷ “School Improvement Funds.” Kentucky Department of Education. November 13, 2024.

<https://www.education.ky.gov/federal/progs/sigi/Pages/default.aspx>

²⁷⁸ “School Improvement Funds Monitoring.” Kentucky Department of Education. April 10, 2025. [Microsoft Excel].

²⁷⁹ “OCIS DSPI SIF Risk Assessment Process.” Kentucky Department of Education. February 27, 2025. [Microsoft Word].

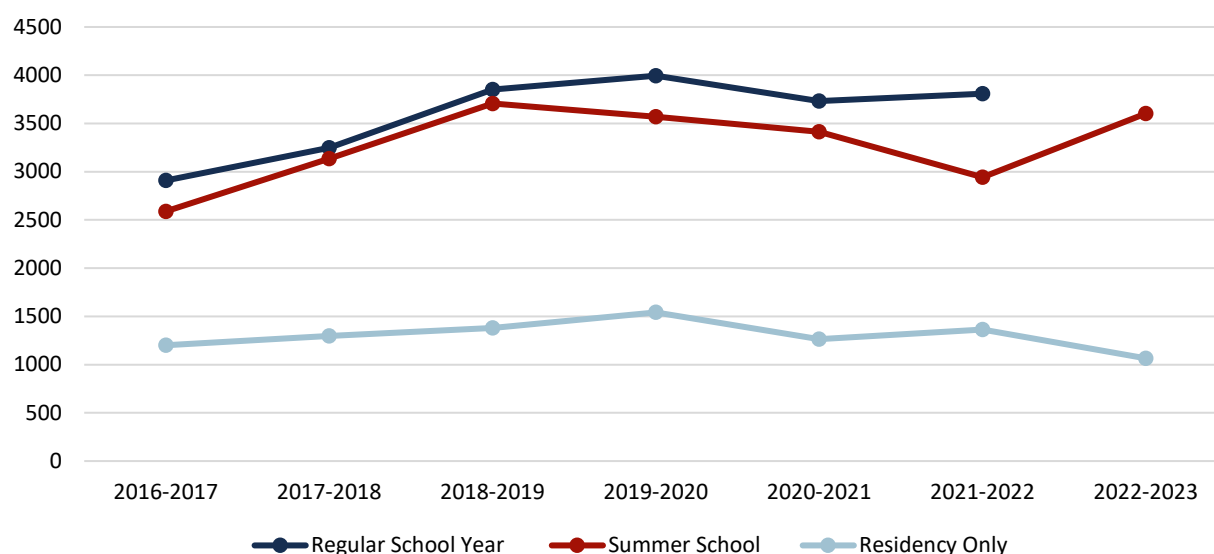
²⁸⁰ “Title I, Part C - Education of Migratory Children.” Kentucky Department of Education. October 9, 2024.

<https://www.education.ky.gov/federal/progs/tic/Pages/default.aspx>

²⁸¹ “Migrant Districts Monitored in School Year 2023-24.” Kentucky Department of Education. April 10, 2025. [Microsoft Word].

²⁸² “Migrant District Monitoring Process.” Kentucky Department of Education. April 10, 2025. [Microsoft Word].

FIGURE 103: NUMBER OF MIGRANT ELIGIBLE STUDENTS IN KENTUCKY BY ENROLLMENT PERIOD & YEAR



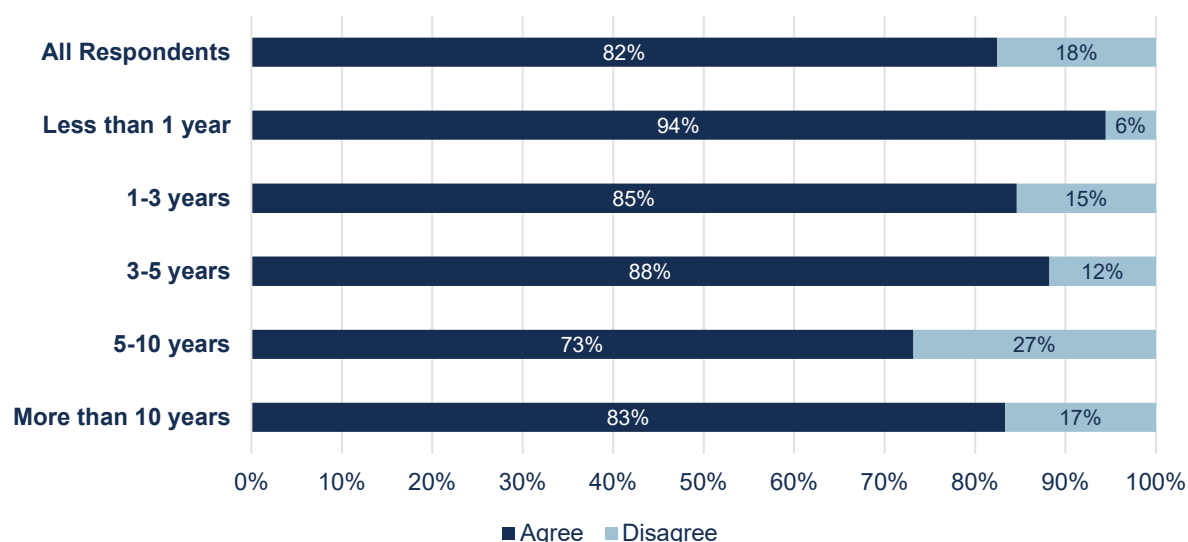
Source: Data retrieved from 'Kentucky Migrant Education Program Service Delivery Plan March 2022' and 'Annual Evaluation Report 2022-2023 – Kentucky Migrant Education Program'. Data for the 202-2023 regular school year students was unavailable at the time of publication.

TECHNICAL ASSISTANCE FOR FEDERAL & STATE PROGRAMS

In interviews with KDE staff, the team heard about OCIS efforts to build districts' capacity to implement federal programs with fidelity. For example, the Title I Support and Improvement Branch holds monthly Title I webinars and sends monthly newsletters with the goal of keeping district informed. KDE staff shared that their resources are high-quality, and as a testament to this, peer states have reached out to access their resources. This includes guidance documents related to allowable procedures and "supplement not supplant." KDE staff also reported helping colleagues who work in the field better understand federal and state requirements given their proximity to districts.

Superintendents reported being satisfied with KDE's technical assistance – 82% of superintendent survey respondents agreed that KDE provides technical assistance and support to their district in a manner that positively impacts student outcomes. As seen in Figure 104, rates of agreement among superintendent respondents with different years of experience were consistent, with two exceptions. Superintendents with less than one year of experience had higher rates of agreement on average (94%), and those with five to ten years of experience had lower rates of agreement on average (73%).

FIGURE 104: KDE PROVIDES TECHNICAL ASSISTANCE AND SUPPORT TO MY DISTRICT IN A MANNER THAT POSITIVELY IMPACTS STUDENT OUTCOMES.



Source: Data retrieved from the Superintendent Survey.

7.9 Finding: KDE manages a Best Practices Database for schools and districts to use as a resource to improve student performance; it is neither actively maintained nor systematically used.

KDE staff described an online form for districts to submit promising practices that are then published online in KDE’s Best Practices Database for other schools and districts to view.

The Database includes 150+ best practices on a variety of topics. However, approximately half of these practices were submitted over a decade ago; only 24 were submitted in the last two years. The team did not observe systematic or widespread use of this Database, or best practices, more generally. Furthermore, the Database is used by OCIS, but there does not appear to be usage or coordination with other KDE offices, such as OTL. The database was not referenced by staff outside of OCIS, or superintendents, in any interviews or focus groups.

While the concept of an online repository is commendable, it needs to be disseminated widely and paired with technical assistance.

7.9.a Recommendation: KDE should create a process to collect and share best practices with districts, using them to offer tailored technical assistance.

MANAGEMENT AUDITS

7.10 Observation: KDE is underutilizing its statutory authority to conduct management reviews and audits to enhance district effectiveness.

As mentioned in the Statewide Accountability & Assessments section, KRS 158.780 and 158.785 establish KBE’s authority to establish a program for management improvement services for districts with a critical lack of efficiency or effectiveness in governance or administration. This can include significant deficiencies in student performance, data irregularities, or lack of capacity within the district. 703 KAR 3:205 outlines the progress steps KDE can take as part of the management improvement program. The steps include:

1. Performing a data and artifact review
2. Performing a management review
3. Performing a comprehensive management audit
4. Determining whether there is a “pattern of significant lack of effectiveness and efficiency in governance and administration”

5. Review of findings by KBE – this can result in a state-assisted or state-managed designation²⁸³

When appropriate, management reviews and audits can be effective tools for addressing critical deficiencies in district governance or administration. Management reviews and audits are carried out by a cross-functional group of KDE staff on an as needed basis.²⁸⁴ KDE staff reported that in the last five years, KDE has completed three management audits for three different districts. Management reviews examine governance policy and procedures, instructional programming, fiscal management, facilities, student transportation, and community perception and support. Management audits expand on the topics covered in management reviews to comprehensively assess district performance.²⁸⁵ State-assisted and state-management designation is discussed in the Statewide Accountability & Assessments section.

7.10.a Recommendation: KDE should, when appropriate, utilize its authority to conduct management reviews and audits to improve efficiency and effectiveness in district governance or administration.

OFFICE OF FINANCE & OPERATIONS AUDITS & MONITORING

Overview

The Office of Finance and Operations leads monitoring for the programs below. These activities are required under state or federal law.

- Fiscal Compliance Audits and Monitoring
- Transportation Monitoring
- Nutrition Monitoring
- Attendance Monitoring
- Civil Rights Vocational Monitoring

All these activities occur annually for all districts, except for nutrition monitoring and civil rights vocational monitoring.

Fiscal Compliance Audits & Monitoring

KRS 157.061 instructs KDE to “conduct internal fiscal, management, and compliance audits of each school district in the Commonwealth on an annual basis.”²⁸⁶ The OFO, specifically the District Financial Management Branch within the Division of District Support, oversees these annual audits. KDE staff described the following process during interviews. First, independent Certified Public Accountants complete a district financial audit. The District Financial Management Branch then reviews the calculations for accuracy and confirms that the fund balances are correct with no deficits. They also review areas where they tend to see concerns, such as student activity funds.

KRS 157.060 requires school districts to report annually on all funds they receive from the state and other sources, as well as account for all expenditures for the year.

KDE staff also shared in interviews that the independent auditors are not always willing or able to accommodate major conflicts in districts’ schedules.

Fiscal audit information comes in from the 171 districts in various formats, paper and electronic, and is saved on a shared drive. The group responsible for student data tracking audits is made up of three people

²⁸³ Review of Previous Management Audits.” Kentucky Department of Education.

<https://apps.legislature.ky.gov/CommitteeDocuments/385/31060/KDE%20-%20Presentation%20-%20JCPS.pdf>

²⁸⁴ “Management Improvement Program.” Kentucky Department of Education. April 16, 2024.

<https://www.education.ky.gov/school/Pages/Management-Audit-Process.aspx>

²⁸⁵ “Review of Previous Management Audits.” Kentucky Department of Education.

<https://apps.legislature.ky.gov/CommitteeDocuments/385/31060/KDE%20-%20Presentation%20-%20JCPS.pdf>

²⁸⁶ “KY Rev Stat § 157.061.” Kentucky General Assembly. 2024.

<https://apps.legislature.ky.gov/law/statutes/statute.aspx?id=3269>

to monitor the 171 audits for submission and content. KDE attendance audit staff reports that the Kentucky Department for Libraries and Archives records retention schedule requires backup documentation for student attendance audits to be in paper format that then goes to archives. While a paper format is not specifically name, the Team reviewed the retention schedule and these records are required. See Figure 105 for an example entry from the retention schedule regarding student attendance reviews.

FIGURE 105: RETENTION SCHEDULE ENTRY FOR ATTENDANCE REVIEW REPORTS

STATE LIBRARIES, ARCHIVES, AND RECORDS COMMISSION

Archives and Records Management Division

Kentucky Department for Libraries and Archives

STATE AGENCY RECORDS RETENTION SCHEDULE		Education, Department of Finance and Operations, Office of District Support, Division of Student Tracking and Data Branch	Record Group Number 0900
Series	Records Title and Description	Function and Use	
04781	Attendance Review Reports	This series documents school district attendance review information collected by the Kentucky Department of Education. Reviews are done to ensure school districts are complying with the mandated instructional days requirement by KRS 158.070 and 702 KAR 7:130. Additionally, Support Education Excellence in Kentucky funding is based on the average daily attendance, which is verified during these reviews.	
	Access Restrictions	Agencies should consult legal counsel regarding open records matters.	
	Contents	Series may contain: Review reports, district schedules, and district responses to the reviews.	
	Retention and Disposition	Retain for two (2) years, then transfer to the State Records Center for an additional three (3) years. Total retention is five (5) years.	

Source: Department of Education records retention schedule retrieved from Kentucky Department for Libraries and Archives.

<https://kdla.ky.gov/records/RetentionSchedules/Documents/State%20Records%20Schedules/KYEducation.PDF>

Using paper, email, spreadsheets, or simple shared drives presents the risk that excess time is spent looking for and compiling information and that important information is missing or inaccurate. For transactional systems or systems of record, such methods also do not typically include a change log or audit trail, making information susceptible to unauthorized or unintentional changes to formulae or data.

Shared drives generally have only rudimentary search capabilities, requiring each document to be opened and analyzed individually. Given the high caseload of KDE staff, it is only practical to look for narrowly targeted areas of risk or common audit findings, which audit systems can do more efficiently.

Statements made by KDE staff regarding the records retention schedule were reviewed and it appears that KDE interprets the schedule accurately with information provided, with the exception that KDE staff may be interpreting the schedule to call for paper records in some cases where the retention schedule is silent on physical format. Staff may not be aware that they can influence the retention schedule through the periodic review process required by 725 KAR 1:010. The KDE records officer can and should suggest changes and clarifications to the schedule to the State Libraries, Archives, and Records Commission.²⁸⁷

Transportation Monitoring

7.11 Observation: KDE Transportation provides public access to limited data via the KDE website.

Information on the bus fleet and a historical mileage report is available, along with some summary data from the 2022-2023 fiscal year, which should be updated.²⁸⁸ KDE transportation staff monitor driver records and bus safety. This is achieved using contract staff to ensure 100% annual statewide coverage. Due to the importance of safety to transporting students, this is a reasonable approach and an understandable use of resources.

²⁸⁷ "Department of Education records retention schedule." Kentucky Department for Libraries and Archives. June 8, 2023.

<https://kdla.ky.gov/records/RetentionSchedules/Documents/State%20Records%20Schedules/KYEducation.PDF>

²⁸⁸ "Pupil transportation data reporting." Kentucky Department of Education. March 14, 2025.

<https://www.education.ky.gov/districts/trans/Pages/Reporting.aspx>

KDE monitors to ensure that drivers have the proper licenses, that buses are in safe condition with all required features, bus inspections are performed as required, and that districts are providing proper training. KDE has a SharePoint-based system for district reporting of buses and drivers. Every district superintendent is required to ensure that bus drivers and their certifications are reported.

KDE sets standards for bus features and maintenance standards. Department staff visit factories to check whether buses intended for Kentucky schools are compliant with safety standards.

- 7.11.a Recommendation:** KDE should publish an annual one-page "fast facts" document with expanded summary data and multi-year trend information including financial metrics such as total cost (state and local), cost per rider, riders versus walkers, special transportation modes (such as specially equipped buses or vans), and driver information (such as average age and hourly wage).

Nutrition Monitoring

7.12 Observation: Nutrition monitoring results are not easily accessible to the public.

KDE monitors local school food authorities on a five-year rotating basis. The state is required to provide administrative review reports in an "accessible, easily understood manner."²⁸⁹

Although KDE provides monitoring guidance for school nutrition program administrative reviews, this guidance is not available publicly online. Monitoring results are available online via CNIPS (Child Nutrition Information and Payment System), but there is no logical link to those results. This page may satisfy the technical requirement, but a link from the main website would improve access.

In addition to the federal guidelines, KDE provides extensive training materials in support of school nutrition programs. The Child and Adult Care Food Program (CACFP) Handbook for Sponsoring Organizations of Affiliated and Unaffiliated Child Care Centers and the Sun Meals (SFSP) Handbook for Sponsors both include valuable information and relevant resource links for those programs based on federal guidance. KDE provides extensive training and resources for the National School Lunch Program via an online platform. This content does have some standard national guidance but contains Kentucky-specific references and content as well. The Administrative Review Guide describes what will be reviewed for each school food authority, and an On-site Administrative Review Guide provides more specificity to the school food authorities on what on-site reviewers will look for and what documents will be inspected. These review guides are very clear and should help school food authorities perform better during regular operations and in their program monitoring visits.

- 7.12.a Recommendation:** KDE should add links to the nutrition monitoring manual, online training, technical assistance materials, and results search to the KDE school meal programs webpage to enhance accessibility by organizations and the public.

Attendance Monitoring

7.13 Finding: Attendance monitoring processes are not efficient.

The Student Tracking and Data Branch under the Division of District Support is responsible for attendance monitoring. According to interviews with KDE staff, attendance records in Infinite Campus inform districts' Support Education Excellence in Kentucky (SEEK) funding. KDE staff reported that attendance monitoring happens year-round. This branch currently has three auditing staff responsible for monitoring. The branch had seven staff previously when they were also responsible for financial monitoring. The three current staff are responsible for the entire state, and their protocol involves on-site work, going into classrooms and ensuring that teachers are taking attendance in Infinite Campus.

²⁸⁹ "State Agency Administrative Review Summary." Kentucky Department of Education. *CNIPS*. <https://cnips.education.ky.gov/CNIPS/Transparency/AdministrativeReviewSummaryList.aspx>

Attendance audits are all paper based with nothing done electronically, according to KDE staff. Districts provide boxes of paper files which must be sorted and scanned into SharePoint. Any records without errors are shredded, while anything with errors is sent to state archives in paper format. Additional information regarding archiving attendance monitoring documents was discussed in the previous section on Fiscal Compliance Monitoring.

- 7.13.a Recommendation:** KDE should update attendance monitoring protocols to use electronic/remote monitoring and electronic document receipt/storage, reserving onsite visits for random selections and follow-ups on suspected major errors or fraud. This will save time, travel costs, intrusion into district operations, printing costs, shredding waste, and archiving costs.

Civil Rights Vocational Monitoring

KDE is required to conduct on-site review as part of its Vocational Education Methods of Administration federal civil rights requirements. Four districts are selected annually for comprehensive on-site reviews that occur between December and April.²⁹⁰ This monitoring is intended to ensure that there is not unlawful discrimination in vocational programming regarding race, color, national origin, sex, or disability. The initial effort stemmed from nationwide findings that male and female students were concentrated in pathways traditionally aimed at them.²⁹¹ These reports are not publicly accessible via the KDE website.

COORDINATION ACROSS KDE

- 7.14 Finding:** The team did not observe consistent coordination of monitoring functions between OFO, Office of Special Education and Early Learning (OSEEL), and OCIS.

Numerous KDE program areas have monitoring functions and responsibilities that are essentially independent of each other. When they happen at the same time, districts feel overburdened. When they are spread out, it can appear that KDE is constantly monitoring or is disorganized if one KDE monitoring team is unaware that another was there or just left. In smaller districts, central office administrators typically fill multiple roles, resulting in the same person seeing multiple rounds of monitoring for different programs.

- 7.14.a Recommendation:** KDE should create a system to track district engagements and prevent overlapping audit or monitoring activities. When more than one activity needs to occur within the same timeframe, ensure that they are appropriately scheduled.

²⁹⁰ "Methods of Administration for Civil Rights Monitoring." Kentucky Department of Education. October 21, 2024. <https://www.education.ky.gov/federal/fed/Pages/Methods-of-Administration-for-Civil-Rights-Monitoring.aspx>

²⁹¹ "Guidelines for Vocational Education Programs, ED, Office for Civil Rights, 3/27/79." U.S. Department of Education. January 14, 2025. <https://www.ed.gov/laws-and-policy/adult-education-laws-and-policy/guidelines-for-vocational-education-programs>

EXCEPTIONAL CHILDREN

OVERVIEW

This section addresses the Kentucky Department of Education's (KDE) efforts to monitor and support Local Education Agencies (LEA) with programming for exceptional children including federally required general supervision responsibilities and state support for gifted and talented students. Preschool supports and monitoring, including programs for preschool children with disabilities, are addressed in greater detail in the Preschool section and KDE's monitoring systems for other program areas are addressed in the Monitoring & Consolidated Monitoring section.

OFFICE OF SPECIAL EDUCATION & EARLY LEARNING

Kentucky public schools enroll approximately 115,000 students with disabilities, about 18 percent of total state student enrollment. A review of publicly available data published by KDE indicates the percentage of students with disabilities has increased slightly each year between the 2021-2022 school year and the 2023-2024 school year.

White students make up 74 percent of students with disabilities statewide while Black or African American students represent 11 percent of all students with disabilities. Hispanic or Latino students represent eight percent, Asian students represent one percent, and students who are two or more races represent six percent.³⁸² White students make up about 71 percent of overall statewide enrollment, Black or African American students make up just under 11 percent, Hispanic or Latino students represent about ten percent, students who are two or more races represent just over five percent, and Asian students make up about two percent.

KDE's Office of Special Education and Early Learning (OSEEL) is responsible for overseeing KDE's responsibilities for exceptional children. The mission of OSEEL is to improve educational outcomes for exceptional and early learners through training and coaching for local district and state school staff and teachers, technical assistance, guidance and policy documents, and providing support to students and their families.³⁸³ OSEEL is led by an Associate Commissioner and includes three Divisions and five Branches. Each Division is led by a Director and Assistant Director. Branches are sub-units of Divisions and are led by a Branch Manager who reports to the Division leadership team. Divisions and Branches of OSEEL include:

- **Division of IDEA Monitoring and Results (DIMR)**
 - Individual Programming Branch
- **Division of State Schools**
 - Kentucky School for the Blind
 - Kentucky School for the Deaf
- **Division of IDEA Implementation and Preschool**
 - Guidance and Support Branch (includes Gifted and Talented)
 - School Readiness Branch

This chapter focuses on special education monitoring and data systems supported by DIMR and state supports related to special education and gifted education by OSEEL's Division of IDEA Implementation and preschool. State schools are addressed in the Kentucky School for the Blind & Kentucky School for the Deaf section and preschool is addressed in the Preschool section.

The Division of IDEA Monitoring and Results consists of fourteen staff members. Figure 122 summarizes the organizational reporting structure of DIMR. The Director supervises six staff members including an Assistant Director, Branch Manager, data analyst and a formal complaint investigator. The Branch Manager

382 "Report Card Dashboards." Kentucky Department of Education. 2024.

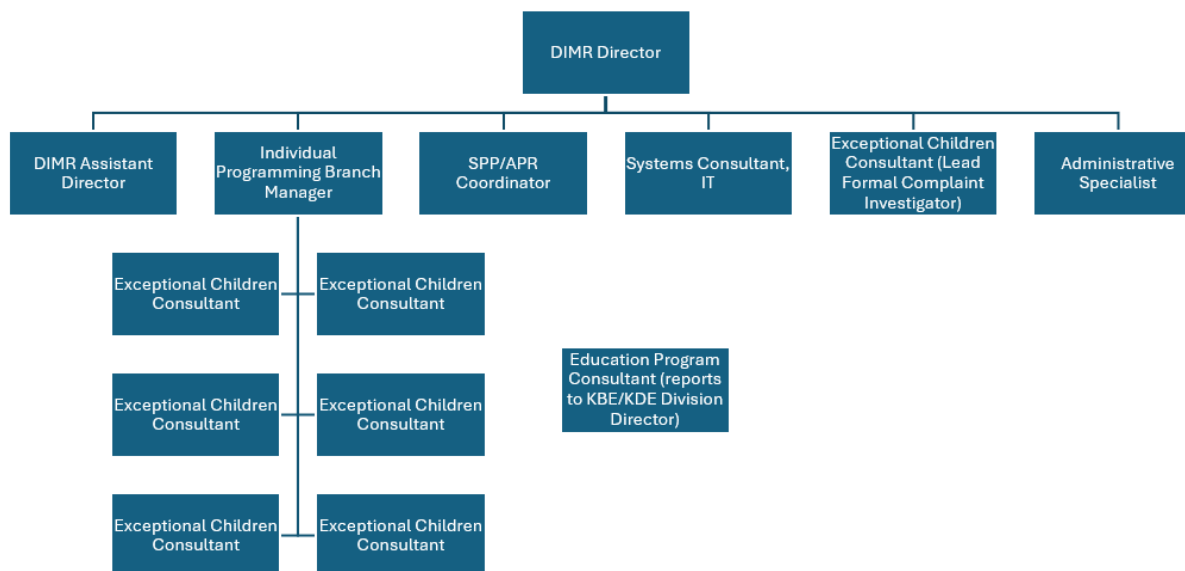
<https://reportcard.kyschools.us/kysrc?organization=20232024:999:999000>

383 "Exceptional Children and Early Learning." Kentucky Department of Education. October 23, 2024.

<https://www.education.ky.gov/specialed/Pages/default.aspx>

leads six Exceptional Children Consultants whose primary responsibilities are conducting Risk Focused Monitoring, desk reviews for Indicator compliance, and issuing and overseeing Corrective Action Plans. An Education Program Consultant sits in the Division of IDEA Monitoring and Results but is supervised by the Kentucky Board of Education (KBE)/KDE Division Director.

FIGURE 122: DIVISION OF IDEA MONITORING & RESULTS ORGANIZATIONAL CHART



Source: Data provided by KDE, “15-Org chart incl reporting lines & staff counts; 24- Staffing Levels-FTE’s & Vacancies by Dept

Special Education General Supervision Responsibilities

State education agencies, including KDE, are responsible under the IDEA of 2004 for implementing a general supervision system designed to ensure each LEA meets the requirements of the IDEA. State systems of general supervision must focus on: 1) improving educational results and functional outcomes for infants with disabilities, their families, and children with disabilities; 2) ensuring that LEAs meet the requirements under IDEA: 20 U.S.C §§ 1412(a)(11), 1416(a); 34 C.F.R. §§ 300.149, 300.600-300.604, and 300.608; and 3) ensuring that the state has a system that collects and reports valid and reliable data.³⁸⁴

States are required to make annual determinations about the performance of each of its LEAs in meeting the requirements of the IDEA, enforcing IDEA-Part B requirements, and addressing IDEA implementation for each educational program for children with disabilities administered within the state, including programs administered by any other state or local agency (but not including elementary schools and secondary schools for Indian children operated or funded by the Secretary of Interior), Section 619 (preschool) programs, public charter schools, children with disabilities residing in nursing homes, and educational programs in juvenile and adult correctional facilities.

The United States Department of Education Office of Special Education Programs (OSEP) defines eight components of a “reasonably designed” system of state general supervision. These eight components include:

- The State Performance Plan (SPP)/Annual Performance Report (APR)
- Data on Processes and Results

³⁸⁴ “Guidance on state general supervision responsibilities under Parts B and C of IDEA.” U.S. Department of Education, Office of Special Education and Rehabilitative Services. July 24, 2023. https://sites.ed.gov/idea/files/Guidance_on_State_General_Supervision_Responsibilities_under_Parts_B_and_C_of_IDEA-07-24-2023.pdf

- Integrated Monitoring Activities
- Improvement, Correction, Incentives, and Sanctions
- Effective Dispute Resolution
- Fiscal Management
- Policies, Procedures, and Practices Resulting in Effective Implementation
- Targeted Technical Assistance and Professional Development³⁸⁵

OSEEL monitors LEA implementation of federal requirements under the IDEA as well as state regulations and statutes related to special education as defined in the KARs and KRS.

To gather input about the impact of KDE's general supervision systems for special education, the team conducted a statewide survey of LEA special education directors. LEA directors were asked to identify the most recent state determination level assigned to their special education program, enrollment size of the LEA, the length of time they have served in their role as special education director, whether their LEA has participated in OSEEL special education monitoring activities within the last year, and whether they supervisor additional program areas in the LEA beyond special education.

A total of 128 LEA Special Education Directors responded to the survey, yielding a response rate of 74 percent. Most of these respondents (87 percent) were from LEAs that Meet Requirements (i.e., LEAs whose special education programs meet most of the state performance targets and compliance requirements). A similar number (88 percent) had participated in KDE Special Education Monitoring in the past three years. Many of these Special Education director respondents (87 percent) supervised other programs as well—with 504-related and preschool-related programs cited most often. Additional information about the respondents is included in Appendix C: Survey Results.

- Survey results reveal that LEA special education directors who have not engaged in KDE monitoring within the past three years, generally perceive KDE systems as less effective than directors in LEAs who have more recently engaged in monitoring with respect to improving federal and state compliance, improving the quality of Individualized Education Programs (IEPs), and improving academic or functional outcomes for students served by special education.
- Survey results indicate similar levels of agreement about getting timely responses from KDE when compared to LEAs who have and have not been monitored recently.
- LEA directors who have not been monitored recently also reported stronger positive sentiment about the frequency of KDE communication over directors of LEAs who have been monitored in the last three years.

Analysis of survey results by the length of time a respondent has served in their role as LEA special education director reveals some variations across directors.

- Respondents who have been in the special education director role for under one year through three years generally viewed KDE special education monitoring systems as more impactful in improving compliance with state and federal requirements, improving IEP quality, and improving academic or other functional outcomes for students with disabilities.
- As the length of time in the director role increases, the perception of effectiveness across each of these areas decreases.
- Special education directors across all lengths of time in their role indicated low levels of agreement that KDE special education monitoring supports improved academic or functional student outcomes. Directors in the role less than one through three years reported the highest level of agreement (41%) and directors in the role over ten years reported the lowest level of agreement (34%).

³⁸⁵ "Guidance on state general supervision responsibilities under Parts B and C of IDEA." U.S. Department of Education, Office of Special Education and Rehabilitative Services. July 24, 2023. https://sites.ed.gov/idea/files/Guidance_on_State_General_Supervision_Responsibilities_under_Parts_B_and_C_of_IDEA-07-24-2023.pdf

- Special education directors across all tenures in the role reported similar levels of satisfaction, 68% to 73%, with the quality of interactions with KDE staff.
- Satisfaction with the frequency of communication from KDE increased in correlation to length of time in the special education director role with newer directors indicating 74% satisfaction with the frequency of communication, directors in the role for five to ten years reporting 80% satisfaction, and directors in the role for ten or more years reporting 85% satisfaction.

State Performance Plan/Annual Performance Report & Special Education Data Systems

OSEP requires all states to submit data related to 17 indicators of the SPP/APR as a component of the Results-Driven Accountability (RDA) monitoring system used to ensure both compliance with the federal requirements under Part B of the IDEA of 2004 as well as to improve performance outcomes for students with disabilities served through special education programs within each respective state. Data collected by the state must be valid and reliable for the purpose of meeting IDEA reporting requirements, including those under IDEA Section 618 and under Section 619, such as the SPP/APR.

The state must also provide an assurance in its annual IDEA Part B grant application to the U.S. ED that the state has policies and procedures that: (1) ensure the state examines data, including data disaggregated by race and ethnicity, to determine if significant discrepancies are occurring in the rate of long-term suspensions and expulsions of children with disabilities among LEAs in the state or compared to such rates for nondisabled children and (2) are designed to prevent inappropriate overidentification or disproportionate representation by race and ethnicity of children as children with disabilities, including children with disabilities with a particular impairment. Where significant discrepancies occur, the state must review and revise (or require the affected LEA to revise) its policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards to ensure that such policies, procedures, and practices comply with IDEA.³⁸⁶ In addition to reporting these data to OSEP, all states are required to annually report on the performance of each LEA in the state in relation to the state's SPP indicators and targets. While the SPP indicator areas are federally required, state performance targets for each indicator are established through input from stakeholders that include parents, school administrators, educators, advocacy groups, and community members.

KRS 157.224(3) requires Kentucky LEAs to submit data to KDE in annual applications and reports to include, at minimum, 1) suspension, expulsion, and drop-out rates; 2) performance of students with disabilities placed in a variety of educational settings; and 3) student transition from school to adult life. OSEEL uses an annual process for collecting, reviewing, and verifying data to determine the level of performance of each LEA in alignment with the federal and state requirements described. This process includes assigning each LEA a determination level of :

- Meets Requirements
- Needs Assistance
- Needs Intervention
- Needs Substantial Intervention

Special education data standards are established for Infinite Campus, the statewide Student Information System. OSEEL publishes data standards guides for each special education area. Data standards documentation provide LEA users with step by step guidance to complete required activities in Infinite Campus as well as flow charts and scenarios. Infinite Campus serves as the data source for most state-level special education data collections with some exceptions where LEA self-report mechanisms conducted outside of Infinite Campus are used to collect and report on federally required data elements. This is comparable to practices found in most state education agencies. Figure 123 includes a list,

³⁸⁶ "34 C.F.R. § 300.170 - Suspension and expulsion rates." Cornell Law School, Legal Information Institute. <https://www.law.cornell.edu/cfr/text/34/300.170>

description of each indicator, corresponding data source used by OSEEL to report performance against each respective indicator, and the frequency of data collection per indicator.

FIGURE 123: SPP INDICATORS & DATA SOURCES³⁸⁷

Indicator	Description	Data Source	Collection Frequency
SPP 1: Graduation Rates	Students with IEPs ages 14-21 who graduate with a regular diploma	Infinite Campus Special Ed Exit Report	Annual
SPP 2: Drop-Out Rates	Students with IEPs ages 14-21 who drop-out of school	Infinite Campus Special Ed Exit Report	Annual
SPP 3: Statewide Assessment	Participation rates and proficiency rates of students with IEPs on statewide assessments, including statewide alternate achievement assessments	Infinite Campus Student Data Review and Rosters	Annual
SPP 4: Suspension/Expulsion	Suspensions and expulsions of students with IEPs of greater than ten days within a school year	Infinite Campus Safe Schools Data	Annual
SPP 5: Least Restrictive Environment	Percentages of students with IEPs ages six to 21 who are educated in different setting types (general classroom, separate school, etc.)	Infinite Campus December first Child Count and LEA verification survey	Annual
SPP 6: Early Childhood Settings	Percentage of students with IEPs enrolled in preschool who are age three to five educated in different setting types (regular early childhood program, special education class, etc.)	Infinite Campus December first Child Count and LEA verification survey	Annual
SPP 7: Preschool Outcomes	Percentage of preschool students with IEPs with improved social and emotional skills, acquisition of knowledge and skills, and use of appropriate behaviors.	Infinite Campus Child Outcomes Summary Process rating	3x per year
SPP 8: Parent Involvement	Parent involvement in the IEP process	Parent survey distributed by OSEEL	Annual

³⁸⁷ "State Performance Plan and Annual Performance Report (SPP/APR) Indicator Support Guide." Kentucky Department of Education, Office of Special Education and Early Learning. September 2023. https://www.education.ky.gov/specialed/excep/MonitoringnResults/Documents/SPP_Indicator_Guide.pdf

Indicator	Description	Data Source	Collection Frequency
		to families through LEA Directors of Special Education	
SPP 9: Disproportionate Representation in Special Education	Disproportionate racial and ethnic group representation in special education	Infinite Campus December first Child Count. Policy, procedure and student record review.	Annual
SPP 10: Disproportionate Representation in Specific Disability Categories	Disproportionate racial and ethnic group representation in specific disability categories.	Infinite Campus December first Child Count. Policy, procedure and student record review.	Annual
SPP 11: Child Find	Percentage of students evaluated for special education eligibility within 60 school days of parental consent	LEA Self-Assessment	Annual
SPP 12: Early Childhood Transition	Percentage of students eligible under IDEA Part C with an IEP implemented by their third birthday	LEA Self-Assessment	Quarterly
SPP 13: Secondary Transition IEP Goals	Students ages 16-21 with an IEP that includes all required elements to support post-secondary transition from school to adult life.	LEA Self-Assessment	Annual
SPP 14: Secondary Transition	Percentage of students with IEPs who are not longer in school enrolled in higher education or employed within one year of leaving high school.	Youth One Year Out student interview and online survey.	Annual
SPP 15: Hearing Requests Resolved*	Percentage of hearing requests resolved through resolution settlement agreements.	EdFacts IDEA-B Dispute Resolution Survey	Annual
SPP 16: Mediation Agreements*	Percentage of mediations held resulting in mediation agreements.	EdFacts IDEA-B Dispute Resolution Survey	Annual
17: State Systemic Improvement Plan (SSIP)*	Multi-year plan for improving results for students with disabilities	State Identified Measureable Result	Annual

Source: KDE's State Performance Plan and Annual Performance Report (SPP/APR) Indicator Support Guide.

*Indicator applies to state education agency only and is not collected from LEAs.

State Special Education Performance & Compliance Data

KDE is annually required to submit special education performance and compliance data to OSEP related to each SPP indicator as part of the federal RDA system. An RDA matrix is completed that includes results indicators, the degree to which students with disabilities in the state achieve positive outcomes, and a compliance score based upon the degree to which the state meets the regulatory requirements of the IDEA. A state must obtain a minimum of 80% across all results and compliance indicators to meet requirements within the federal RDA system. Kentucky's results for 2017 through 2024 are as follows:³⁸⁸

- 2024: Meets Requirements
- 2023: Meets Requirements
- 2022: Meets Requirements
- 2021: Meets Requirements
- 2020: Meets Requirements
- 2019: Meets Requirements
- 2018: Meets Requirements
- 2017: Meets Requirements

It is commendable that Kentucky has achieved and sustained a “Meets Requirements” determination within OSEP’s RDA system for this period of time. Such a designation shows the state’s commitment to IDEA implementation and general supervision systems that support students with disabilities. In 2024, only 34 percent of U.S. states and territories met IDEA requirements under OSEP’s RDA model while 66 percent of states and territories required assistance or intervention. Across the eight years for which state RDA determinations were reviewed, only six other states obtained a “Meets Requirements” determination each year for the same time period: Kansas, Massachusetts, Minnesota, Missouri, Pennsylvania, and Wisconsin.³⁸⁹

The statewide survey of LEA special education directors provided an option for open-ended responses. A total of 44 of 138 LEA special education directors provided open-response feedback about their experiences with KDE. Of the 44 responses, 38 special education directors reported serving LEAs who were determined by KDE to “Meet Requirements” for special education while six directors reported serving districts who received a “Needs Assistance” determination.

Twenty-two of the 38 special education directors serving “Meets Requirements” LEAs reported negative experiences with OSEEL staff and/or systems related to special education. All six special education directors serving districts determined to “Need Assistance” provided negative feedback about their experiences with OSEEL’s special education systems. A consistent theme emerged across LEA special education director responses regarding a perceived lack of support from OSEEL related to high-quality instructional supports for students served by special education. Respondents also highlighted what they perceive as a burdensome, overly-bureaucratic compliance focused system that does not provide actionable support to districts or students and takes LEA special education director time away from serving as instructional leaders in their districts due to the heightened focus on compliance.

Respondents also highlighted the need for KDE to provide stronger training to school leaders and educators. Areas where additional instructional support were mentioned included clear guidance for educators around impactful accommodations to support student access to general education learning, effective methods for providing specially designed instruction (especially for special education teachers who are newer practitioners), and an increased emphasis on effective strategies for teaching Mathematics to students with disabilities.

Responses from the survey conducted of LEA superintendents reveals similar sentiments in open-responses regarding KDE and special education. Superintendents reported a perception of OSEEL as

³⁸⁸ “State Performance Plans/Annual Performance Reports (SPP/APR).” IDEA. 2024. <https://sites.ed.gov/idea/spp-apr/>

³⁸⁹ “2024 Determination Letters on State Implementation of IDEA.” IDEA. June 25, 2024. <https://sites.ed.gov/idea/idea-files/2024-determination-letters-on-state-implementation-of-idea/>

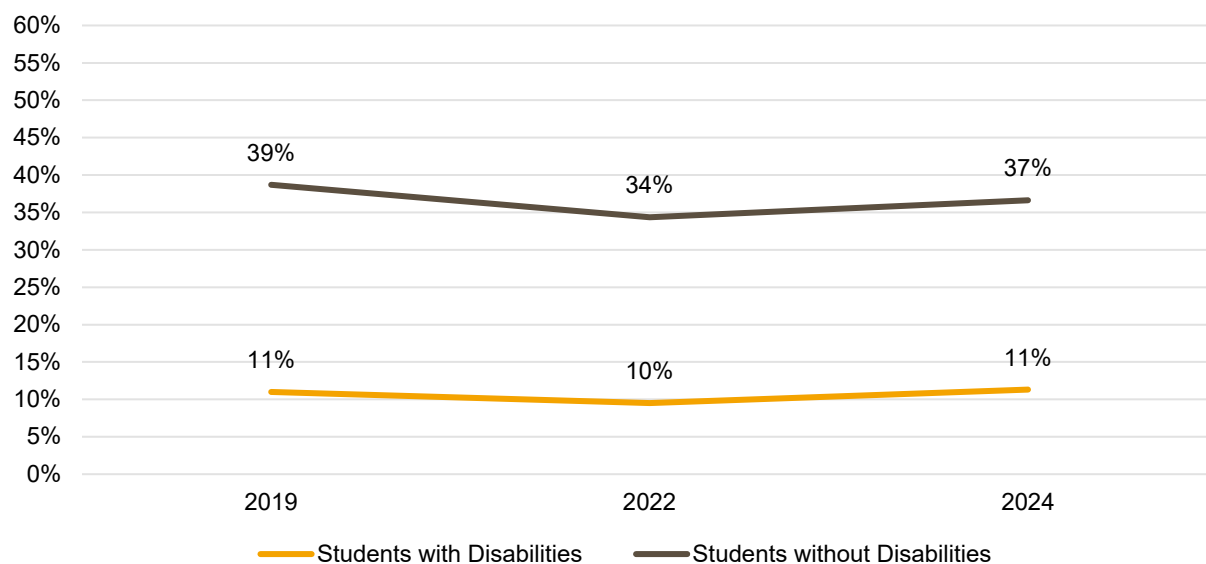
overly focused on compliance to the point of becoming burdensome to an LEA's ability to effectively serve students. Superintendent recommendations called for OSEEL to place greater emphasis on student outcomes and high-quality instruction rather than a compliance-first approach to special education supports for LEAs.

Across several focus groups conducted with KDE staff, statements were made describing KDE's understanding of the relationship between compliance and student outcomes. This relationship was commonly explained as viewing special education compliance as the floor of opportunity necessary for stronger student outcomes. Survey responses collected from LEA special education directors echoed this messaging regarding KDE's view about compliance as the floor of outcomes.

While KDE has developed a robust and intentional system for ensuring LEA compliance with federal and state special education regulations, students with disabilities served by special education in Kentucky have not demonstrated meaningful academic outcomes over time.

Recent National Assessment of Educational Progress (NAEP) data illustrated in Figure 124 demonstrates students with disabilities in Kentucky underperform academically when compared to students without disabilities and have underperformed consistently across NAEP administrations in 2019, 2022, and 2024. In fourth grade Reading, students with disabilities demonstrated 11% proficiency in 2019, 10% proficiency in 2022, and 11% proficiency in 2024 whereas students without disabilities demonstrated proficiency levels of 39%, 34%, and 37% for the same three tested years.

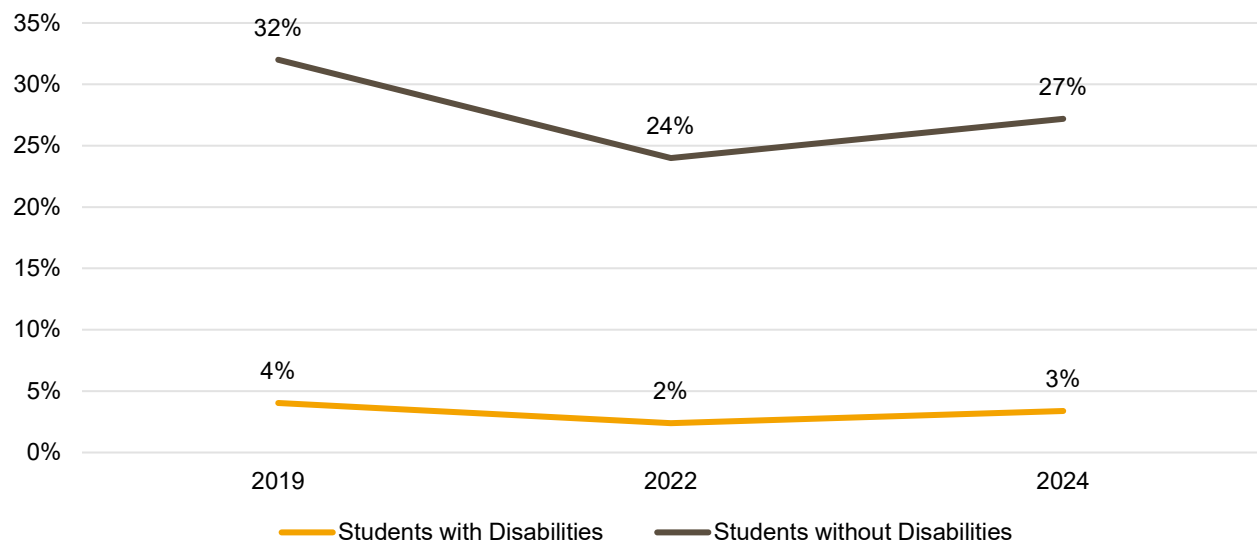
FIGURE 124: 4TH GRADE READING NAEP PROFICIENCY BY DISABILITY STATUS



Source: Data retrieved from *The Nation's Report Card*, "NAEP Data Explorer."
<https://www.nationsreportcard.gov/ndecore/xplore/NDE>

Similarly, Figure 125 illustrates a similar trend related to the Mathematics achievement of eighth grade students with disabilities. Students with disabilities have demonstrated a slight decrease in performance from 4% proficiency in 2019 to 1% proficiency in 2022 and 2024. While the performance of students without disabilities in eighth grade Mathematics also decreased during this time, based on the 2024 NAEP assessment results, a 24 percentage point gap between students with disabilities and students without disabilities in this area exists.

FIGURE 125: 8TH GRADE MATH NAEP PROFICIENCY RATES BY DISABILITY STATUS



Source: Data retrieved from The Nation's Report Card, "NAEP Data Explorer."
<https://www.nationsreportcard.gov/ndecore/xplore/NDE>.

Federally reported SPP indicator 3D data regarding gaps in proficiency between students with IEPs served by special education in comparison to the performance of all students across Fiscal Year (FY) 2020 through FY 2022 also reveals persistent performance gaps over time. Figure 126 outlines data reported by Kentucky related to federal SPP Indicator 3D illustrating proficiency levels of students with IEPs and all students in fourth grade, eighth grade, and high school Reading and Mathematics respectively. These data are based on student performance on the Kentucky Summative Assessment.

FIGURE 126: PROFICIENCY RATES FOR CHILDREN WITH IEPs & ALL STUDENTS AGAINST GRADE LEVEL ACADEMIC ACHIEVEMENT STANDARDS.

	FY 2020 IEP Proficiency	FY 2020 All Students Proficiency	FY 2021 IEP Proficiency	FY 2021 All Students Proficiency	FY2022 IEP Proficiency	FY 2022 All Students Proficiency
4th grade Reading	26.26%	42.91%	26.03%	46.14%	28.27%	47.85%
8th grade Reading	19.24%	50.07%	12.93%	44.16%	13.1%	43.84%
High School Reading	11.17%	38.01%	11.84%	45.67%	13.44%	46.03%
4th grade Math	18.62%	33.33%	20.59%	39.43%	23.04%	42.28%
8th grade Math	8.26%	26.95%	11.92%	36.44%	10.93%	35.64%

	FY 2020 IEP Proficiency	FY 2020 All Students Proficiency	FY 2021 IEP Proficiency	FY 2021 All Students Proficiency	FY2022 IEP Proficiency	FY 2022 All Students Proficiency
High School Math	7.84%	30.33%	8.53%	37.66%	9.26%	34.36%

Source: Data Retrieved from the Kentucky Department of Education.

Analysis of this data indicate slight gains in academic performance by students with IEPs in fourth grade Reading, high school Reading, fourth grade Mathematics, eighth grade Mathematics, and high school Mathematics when comparing student performance in FY 2020 to student performance in FY 2022 and a decrease in student performance in eighth grade Mathematics for the same time period. While increasing student proficiency rates should be positively acknowledged, the gains illustrated within these data also demonstrate persistent proficiency gaps when comparing the performance of students with disabilities to the performance of all students. FY 2022 data reveals a 19.5 percentage point gap in performance between students with disabilities and all students in fourth grade Reading, a 30.7 percentage point gap in eighth grade Reading, and 32.5 percentage point gap in high school Reading. Proficiency gaps in Mathematics are comparable at 19.2 percentage points in fourth grade Mathematics, 24.7 percentage points in eighth grade Mathematics, and 25.1 percentage points in high school Mathematics.

Further analysis and consideration regarding the way in which student performance and compliance data are used by OSEEL to inform annual determinations about LEA performance and associated monitoring activities are discussed in greater detail in the proceeding section.

LEA Special Education Performance & Compliance Data

OSEEL collects data from LEAs to make annual determinations about the degree to which LEAs are meeting state and federal special education requirements. This data reflects SPP indicators one through 14 and are made publically available on the KY Special Education Indicator Dashboard powered by the Kentucky Center for Statistics. The Special Education Indicator Dashboard includes data for each Kentucky LEA, the Kentucky School for the Blind, and the Kentucky School for the Deaf across the 14 performance and compliance indicators for the most recent three reporting years. The data is filterable by indicator, year, and region.

OSEEL's Division of IDEA Monitoring and Results uses selected SPP indicators to make annual LEA determinations. The indicators used to make determinations include:³⁹⁰

- Indicator 1: Graduation
- Indicator 2: Drop-Out
- Indicator 4B: Suspension/Expulsion
- Indicator 9: Disproportionate Representation
- Indicator 10: Disproportionate Representation in Specific Disability Categories
- Indicator 11: Child Find
- Indicator 12: Early Childhood Transition
- Indicator 13: Secondary Transition

Additional factors in LEA determinations are:

- Participation in Kentucky Summative Assessment for fourth and eighth grade Reading and Math

³⁹⁰ "Annual Determinations on the Special Education Performance of Districts." Kentucky Department of Education, Office of Special Education and Early Learning, Division of IDEA Monitoring and Results. March 26, 2024. <https://www.education.ky.gov/specialed/excep/MonitoringnResults/Documents/KyDeterProcess.pdf>

- Eighth grade Math performance
- Findings on noncompliance during an onsite
- Persistent failure or inability to comply with IDEA requirements and its implementing regulations

The indicators that drive LEA annual determination are aligned with state and federal data reporting requirements related to discipline of students with disabilities, disproportionate representation of racial or ethnic groups in special education programs, school completion rates for students with IEPs, and post-secondary preparation.

An analysis of LEA determinations by OSEEL across the most recent four years – 2021 through 2024 – reveals that a majority of LEAs in the state are determined to meet state and federal requirements for the indicators noted above; however, there has been a decline in the number of LEAs determined to meet requirements between 2022 and 2024. A review of the Corrective Action Plan (CAP) and noncompliance data provided by KDE suggest this increase in LEAs who need assistance related to their special education program is due to findings of noncompliance identified through monitoring. Notably, no LEAs have been determined to Need Intervention in the past two reported years. In 2021 and 2022, less than 1% of LEAs in the state were assigned to this determination level on the basis of their SPP indicator data.

FIGURE 127: LEA SPECIAL EDUCATION DETERMINATIONS 2021-2024

Determination Level	2021	2022	2023	2024
Meets Requirements	160 (92%)	163 (94%)	158 (91%)	147 (85%)
Needs Assistance (Year 1)	8 (4%)	7 (4%)	15 (9%)	22 (13%)
Needs Assistance (Year 2)	2 (1%)	1 (<1%)	0	4 (2%)
Needs Intervention (Year 1)	1 (<1%)	1 (<1%)	0	0
Needs Intervention (Year 2)	1 (<1%)	1 (<1%)	0	0
Needs Intervention (Year 3)	1(<1%)	0	0	0
Total LEAs	173	173	173	173

Source: Data provided by the Kentucky Department of Education, “LEA Determinations Final Scores – Current Year and Prior Three Years.”

OSEEL has special education monitoring processes in place to verify LEA compliance with SPP Indicators 4, 9, 10, 11, 12, and 13. These activities are authorized under federal statutes at 34 C.F.R. § 300.600 and state statutes at 707 KRS 1:380. State practices for the utilization of SPP results and performance indicator data to drive annual LEA performance determinations and aligned monitoring varies across states.

- Ohio, like Kentucky, uses SPP Indicators 1, 2, 4, 9, 10, 11, 12, and 13 to make annual LEA performance determinations.
- Similarly, Alabama, makes annual LEA performance determinations using Indicators 4, 9, 10, 11, 12, and 13.
- Other states such as Tennessee and Mississippi use all 14 SPP indicators applicable to LEAs, including academic assessment participation and proficiency for fourth grade, eighth grade, and high school reported within SPP indicator 3 and post-secondary outcomes related to higher education enrollment, competitive employment, or other workforce training programs reported in SPP indicator 14.

IDEA regulations at 34 C.F.R. § 300.600(b) clarify that a state’s monitoring process has two purposes: (1) to improve educational results and functional outcomes of all children with disabilities and (2) to ensure public agencies meet IDEA-B requirements with an emphasis on IDEA requirements most closely related

to improving educational results. Given the weight placed on promoting educational results as a primary function of monitoring and general supervision, it is reasonable that when a state makes determinations about the performance of LEAs related to IDEA requirements an emphasis on educational results should factor prominently in making such determinations.

FIGURE 128: SPP INDICATOR VERIFICATION THROUGH MONITORING³⁹¹

SPP Indicator	Selection Criteria	Process	Frequency & Timelines
SPP 4: Suspension/Expulsion	<p>Districts are selected through a two-part process.</p> <ul style="list-style-type: none"> Step 1: A review of district-reported data from Infinite Campus (IC) to identify if discrepancies by race exist in out-of-school removals. Step 2: If a discrepancy three times greater than the state target exists, DIMR conducts off-site desk reviews of student IDEA due process files to determine if the policies, procedures or practices violate the IDEA. 	Virtual Review	Annual March - April
SPP 9: Disproportionate Representation in Special Education	<p>Districts are selected through a two-part process.</p> <ul style="list-style-type: none"> Step 1: A review of district reported data from IC to determine if disproportionate representation exists. Step 2: If disproportionate representation exists, DIMR conducts off-site desk reviews of student IDEA due process files to determine if the policies, procedures or practices violate the IDEA. 	Virtual Review	Annual October - November
SPP 10: Disproportionate Representation in Specific Disability Categories	<p>Districts are selected through a two-part process.</p> <ul style="list-style-type: none"> Step 1: A review of district-reported data from IC to determine if disproportionate representation exists. Step 2: If disproportionate representation exists, DIMR conducts off-site desk reviews of student IDEA due process files to determine if the policies, procedures or practices violate the IDEA. 	Virtual Review	Annual October- November
SPP 11: Child Find	<p>Districts are selected based on self-reported data. OSEEL DIMR uses online randomization tools to random reviews 10% of LEAs reporting 100% compliance with the Indicator requirements to validate LEA self-report results.</p>	Virtual Review	Annual September - October

³⁹¹ "OSEEL Monitoring Brief." Kentucky Department of Education.
https://www.education.ky.gov/specialed/excep/forms/Documents/Monitoring_Brief.pdf

SPP Indicator	Selection Criteria	Process	Frequency & Timelines
SPP 12: Early Childhood Transition	Districts are selected based on self-reported data. OSEEL DIMR uses online randomization tools to random reviews 10% of LEAs reporting 100% compliance with the Indicator requirements to validate LEA self-report results.	Virtual Review	Annual September-October
SPP 13: Secondary Transition IEP Goals	Districts are selected based on self-reported data. OSEEL DIMR uses online randomization tools to random reviews 10% of LEAs reporting 100% compliance with the Indicator requirements to validate LEA self-report results.	Virtual Review	Annual September-October

Source: Data retrieved from KDE's "OSEEL Monitoring Brief."

For each respective indicator (if selected for virtual review), a sample of IEP records is reviewed using OSEEL's Compliance Record Review Document. This protocol is used to maintain a consistent standard for LEA compliance determinations. For indicators 11, 12, and 13, a minimum of 10% of the district's special education records related to the indicator are reviewed to ensure a valid sample. For indicator 11, the sample includes at least 10% of students evaluated for special education eligibility within the current year, including students who were determined eligible as well as students determined ineligible. When an LEA has 100 students or fewer within an indicator area, ten files are reviewed at minimum. If an LEA has ten or fewer students related to the indicator area, all student files are reviewed.

Where noncompliance is identified, LEAs must correct the student records determined to be noncompliant. In many cases, the LEA is required to convene the student's Admissions and Release Committee (ARC) to complete such corrective measures. If an LEA is found to have 95% compliance or less within an indicator area, such noncompliance is deemed systemic under the OSEEL protocols. LEAs found to be systemically noncompliant are required to develop and complete a CAP to address the noncompliance in addition to correction of student records. Required activities for systemic noncompliance include: a root cause analysis completed within 30 days, training conducted by a KDE approved trainer, and a follow up activity such as peer reviews of student records or PLCs to discuss identified noncompliance. These corrective actions are approved within 30 days of the issuance of noncompliance, are monitored monthly by OSEEL, and must be completed by the LEA within one year.³⁹²

Figure 129 outlines CAPs issued to LEAs for noncompliance related to SPP indicator validation between 2020 and 2024. A higher number of CAPs were issued in 2020-2021 and 2021-2022 with more LEAs requiring corrective action for timelines associated with SPP Indicators 11 and 12 related to timely evaluations and transition from IDEA Part C to IDEA Part B by a child's third birthday. Requirements for special education timelines remained in effect during COVID-19 related educational disruptions, which impacted LEA compliance with requirements during that time period.

³⁹² "Compliance Record Review." Kentucky Department of Education, Office of Special Education and Early Learning, Division of IDEA Monitoring and Results. August 2024.
https://www.education.ky.gov/specialed/excep/forms/Documents/Compliance_Record_Review.pdf

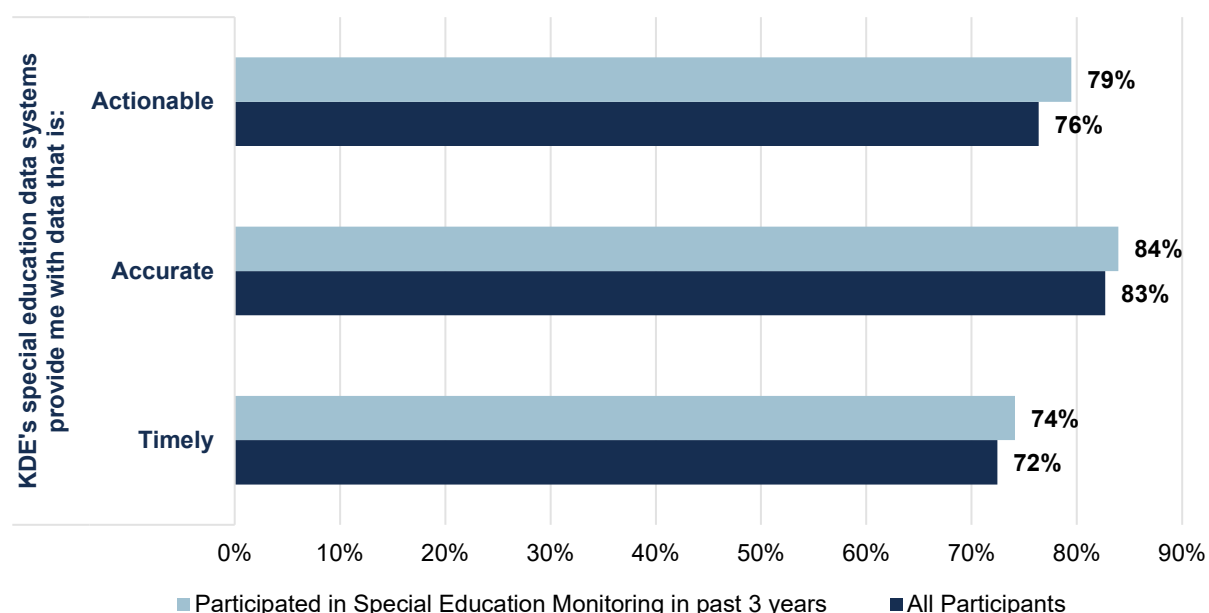
FIGURE 129: CAPs ISSUED FOR INDICATOR NONCOMPLIANCE

School Year	Number of Districts that received at least one CAP related to Indicator noncompliance	Number of Districts that received two or more CAPs related to Indicator noncompliance
2020-2021	40	2
2021-2022	51	8
2022-2023	26	5
2023-2024	35	2

Source: Data provided by the Kentucky Department of Education, "51 OSEEL CAP_Tracker."

LEA special education directors were surveyed to determine their perceptions of special education data systems in Kentucky. Survey respondents were asked to evaluate the degree to which KDE's special education data systems provided actionable, timely, and accurate data to inform LEA program continuous improvement efforts. Survey responses are summarized in Figure 130.

FIGURE 130: DATA RECEIVED FROM KDE'S SPECIAL EDUCATION DATA SYSTEMS



Source: Data retrieved from the Special Education Director Survey.

About three quarters of special education directors agree that the data they receive from KDE's special education monitoring system is actionable, accurate, and/or timely. Approximately one-quarter of directors do not agree that they receive timely, accurate, and actionable data from KDE's systems.

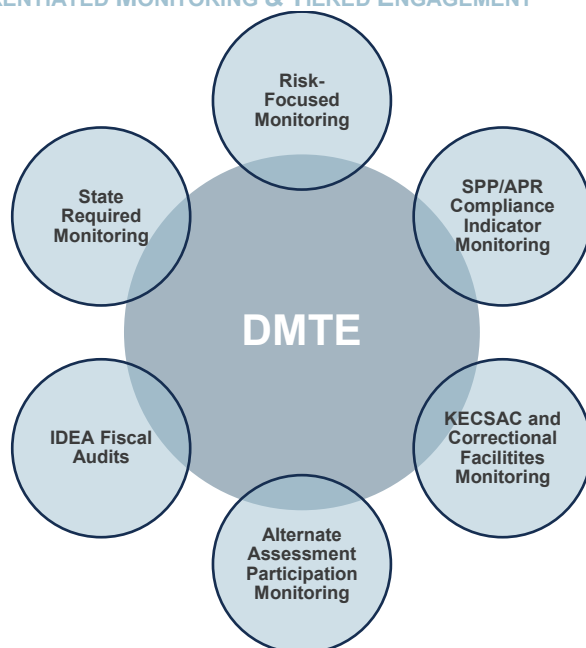
Integrated Monitoring

Integrated monitoring activities are a required and critical component of a general supervision system. These activities should be designed to examine and evaluate LEA implementation of IDEA with a focus on educational and functional outcomes as well as compliance with IDEA requirements. Integrated monitoring activities can include, but are not limited to, interviews with LEA program staff, listening sessions with families of students with disabilities in LEAs, IEP file reviews, data analysis, and reviews of LEA policies, procedures, and practices. When the state determines a LEA is out of compliance with an applicable IDEA requirement, the state issues a written notification of noncompliance (i.e., a finding) to the LEA and the LEA

must correct the noncompliance within one-year of notification.³⁹³ 707 KAR 1:380 provides the state regulatory authority for the monitoring of LEA special education programs and requires KDE to conduct monitoring to determine LEA compliance with state and federal requirements and to take corrective action when necessary.

OSEEL conducts six types of special education monitoring within its Differentiated Monitoring and Tiered Engagement (DMTE) system. Figure 131 demonstrates the types of monitoring activities that may be conducted through the DMTE.³⁹⁴

FIGURE 131: OSEEL DIFFERENTIATED MONITORING & TIERED ENGAGEMENT



Source: Data provided by the Kentucky Department of Education, "Monitoring Brief."

Risk-Focused Monitoring (RFM) is a risk-based, cyclical, and individualized monitoring process of LEA special education programs. RFM includes desk reviews, on-site monitoring activities, and CAPs when necessary. Monitoring activities are driven by an LEA's level of risk which is informed by that LEA's annual determination and score on a Risk Assessment Rubric. Annual LEA determinations and Risk Assessment Rubric scores are combined to identify the LEAs who will engage in RFM. Once identified, OSEEL staff analyze each LEA's local data to determine monitoring focus areas. In 2023-2024, 15 LEAs were monitored through the RFM process. Each RFM review includes two to three focused monitoring areas based on the LEA's identified areas of risk.

The Risk Assessment Rubric used to determine an LEA's level of risk includes:

- Percentage of students receiving special education and related services
- Timely and accurate submission of IDEA data annually
- IDEA Formal Written Complaints with substantiated noncompliance
- Director of Special Education experience in the school district

³⁹³ "Guidance on state general supervision responsibilities under Parts B and C of IDEA." U.S. Department Of Education Office of Special Education and Rehabilitative Services. July 24, 2023. https://sites.ed.gov/idea/files/Guidance_on_State_General_Supervision_Responsibilities_under_Parts_B_and_C_of_IDEA-07-24-2023.pdf

³⁹⁴ "Differentiated Monitoring and Tiered Engagement." Kentucky Department of Education, Office of Special Education and Early Learning. August 2024. <https://www.education.ky.gov/specialed/excep/forms/Documents/DMTEManual.pdf>

- Significant Disproportionality and
- SPP Indicators:
 - 4A: Suspension/Expulsion
 - 5A: Educational Environments
 - 6A: Preschool Childhood Settings
 - 7: Preschool Outcomes
 - 8: Parent Involvement
 - 14C: Post-School Outcomes

Bonus points are awarded to reduce an LEA's level of risk. These points are awarded based upon:

- Submitting the Grant Management Application and Planning (GMAP) application in a timely and substantially approvable form
- Participating in the 1st Year Director of Special Education Mentorship program through OSEEL GUIDES
- Participating in Transformation Zone for the State Systemic Improvement Plan (SSIP)
- Receiving "Meets Requirements" for LEA Determinations for the last five years

At times, OSEEL may conduct comprehensive special education reviews that include both a desk audit and an on-site visit. OSEEL's DMTE manual indicates that a comprehensive special education review may be initiated based on factors such as a high-volume of IDEA formal written complaints or parent calls, allegations concerning the denial of free appropriate public education for eligible students, failure to comply with the requirements of an established CAP or correct noncompliance within one-year, or inaccurate data submission. Although the DMTE manual describes comprehensive reviews, it is unclear—based on a review of internal documentation such as records of monitoring activities and CAPs—with what frequency comprehensive reviews are conducted.

OSEEL maintains detailed and thoroughly documented processes and procedures for special education monitoring activities. OSEEL tracks the status of each CAP issued to a LEA via identification of noncompliance through CAP closure, which includes the LEA identified with noncompliance, date noncompliance was identified, the type of monitoring through which the noncompliance was identified, area of monitoring, current CAP status, aligned regulatory requirements and statutes where the LEA was determined noncompliant, and the number of student IEPs determined non-compliant.

KECSAC and Correctional Facilities monitoring utilize OSEEL's Compliance Record Review Document to review student level IEP records. Sample sizes for each type of monitoring are based on the number of enrolled students in the LEA and the type of monitoring to be conducted and are described in the DMTE Manual. The Compliance Record Review Document includes compliance checklists for the following areas:

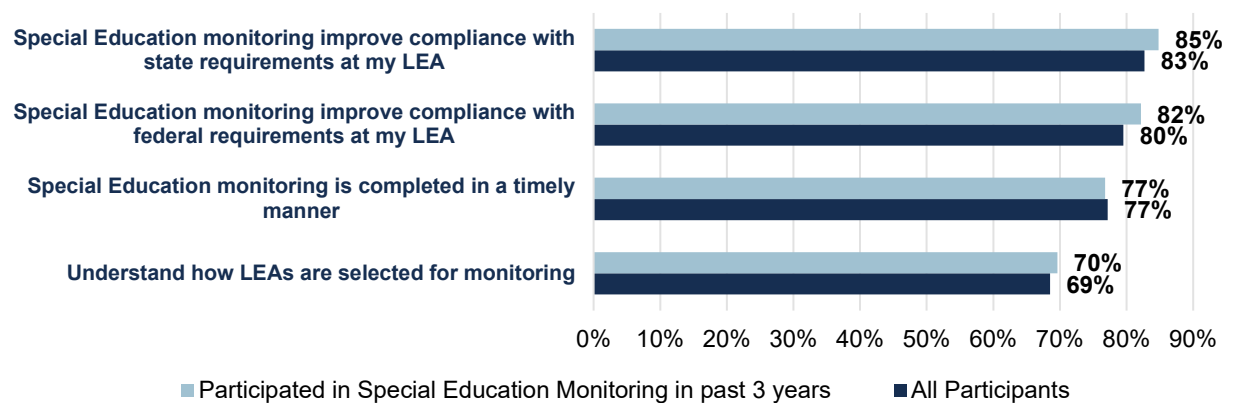
- Meeting Notice and Membership of the ARC
- Prior Written Notice to Parent(s)
- Preschoolers Transitioning from Part C
- IEP
- Transition Services
- Evaluation Timelines
- Initial Evaluation and Reevaluation

Alternate Assessment Monitoring is conducted to support state compliance with the Elementary and Secondary Education Act of 1965 (ESEA), as amended by ESSA, Section 1111(b)(2)(D)(i)(I). Students with disabilities who are working toward alternative academic achievement standards may participate in a state's alternative assessment. However, only students with the most significant cognitive disabilities, and no more than one percent of students in a state, should participate in the alternate achievement assessment. OSEEL conducts student file reviews for LEAs in the state who have greater than one percent of their students participating in the state alternative achievement assessment. These file reviews evaluate the extent to which ARCs within LEAs are appropriately determining the need for a student to participate in the state's alternate achievement assessment program.

OSEEL staff engage in state-required monitoring activities with other monitoring teams within KDE on an as-needed basis. These state monitoring activities include Management Audits initiated based on data from LEAs that indicate significant deficiencies in student performance, lack of capacity within the LEA, or data irregularities. The need for a Management Audit is determined by the Commissioner of Education and may include, but is not limited to, the LEA's governance policies and procedures, instructional programming, fiscal management, physical maintenance or facilities construction, or student transportation. The frequency, volume and focus of Management Audits, however, is unclear, given the audit, CAP reports and analyses provided by KDE did not indicate a Management Audit had occurred between 2022 and 2025. In addition, OSEEL documentation stated there are no specific protocols for this type of monitoring activity.

LEA special education directors were surveyed to determine the degree to which they feel informed about the requirements of KDE special education monitoring, the efficiency of KDE staff in completing monitoring activities with LEAs, and the overall impact of special education monitoring systems on improving the performance of LEA special education programs. A summary of results is provided in Figure 132.

FIGURE 132: LEA PERCEPTIONS ON SPECIAL EDUCATION MONITORING

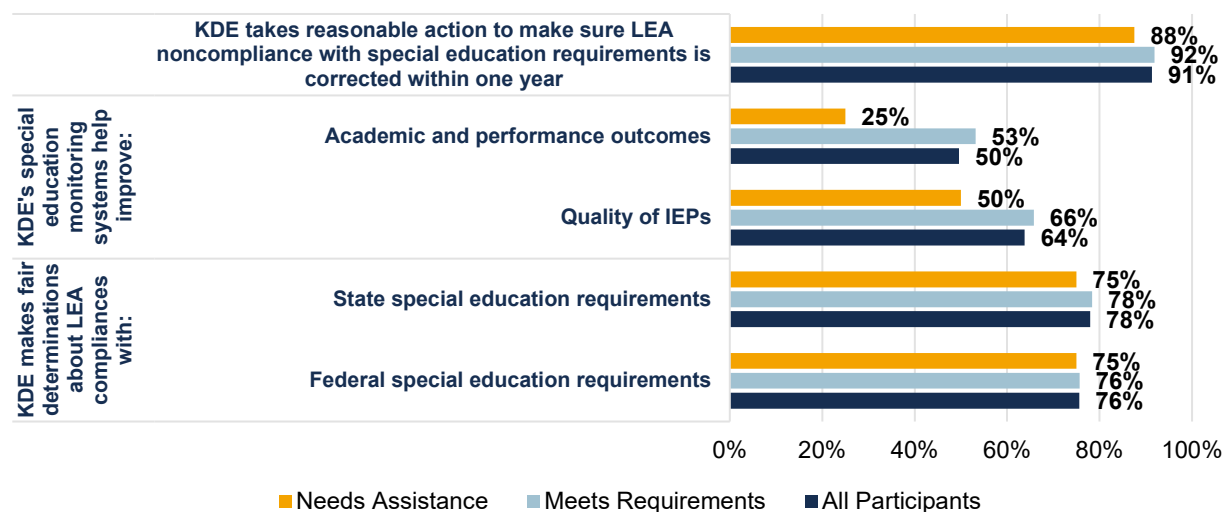


Source: Data retrieved from the Special Education Director Survey.

Almost a third of special education directors do not understand how LEAs are selected for monitoring. Special education directors whose LEAs have participated in special education monitoring in the last three years generally agree with statements around special education monitoring at a higher rate than those who have not participated in monitoring. Over three quarters of all directors agree that special education monitoring is completed in a timely manner.

LEA special education directors also responded to several survey items to specifically evaluate their perceptions regarding the effectiveness of OSEEL special education monitoring in improving educational and functional outcomes for students with disabilities as well as perceptions about the impact of monitoring on improving compliance with state and federal compliance requirements in the KAR, KRS, and IDEA.

FIGURE 133: IMPACT OF KDE'S SPECIAL EDUCATION MONITORING SYSTEM



Source: Data retrieved from the Special Education Director Survey.

There is low agreement among LEA directors that KDE's special education monitoring systems help improve the quality of IEPs and academic performance and outcomes. Directors at LEAs designated as Needs Assistance agree with these statements at a much lower rate than directors in LEAs who Meet Requirements. Most special education directors, however, regardless of LEA designation, agree that KDE takes reasonable action to make sure LEA noncompliance with special education requirements is corrected within one year.

10.1 **Finding: Special education data systems and monitoring activities are ineffective to support LEAs in closing performance gaps for students with IEPs.**

KDE special education data systems and monitoring are intentionally designed to facilitate LEA regulatory compliance as part of the state's general supervision system. The primary purpose of a state's general supervision system as described by OSEP is to improve educational results and functional outcomes for children with disabilities. KDE stakeholders have highlighted a need for a stronger focus on student achievement and outcomes. Data from Kentucky state assessment and national assessments illustrate persistent gaps in student proficiency and academic outcomes over time when comparing the performance of students with IEPs to the performance of other student groups. During focus groups OSEEL staff did not discuss performance gaps between students with disabilities and non-disabled students beyond reference to OSEEL's operating perspective as compliance being a floor for outcomes.

10.1.a Recommendation: KDE should utilize all aspects of State Performance Plan (SPP) indicators 1 through 14, including the results-oriented aspects of those indicators, when establishing annual LEA determination levels. KDE incorporates state assessment participation data as part of its annual process for determining LEA special education performance and minimally addresses student achievement or proficiency data by incorporating Math performance for eighth grade students with IEPs as an additional factor in annual determination.

10.1.b Recommendation: KDE should refine special education monitoring and support processes to ensure the system is focused on improving educational and functional outcomes for students with disabilities. This includes:

- Balancing outcomes with federal and state compliance elements of general supervision given IDEA regulations at 34 C.F.R. § 300.600(b) clarify that a state's monitoring must focus on improving educational results and functional outcomes and ensure LEAs meet

IDEA-B requirements with an emphasis on requirements most closely related to improving educational results.

- Align monitoring and support activities and protocols to revised LEA determinations to support LEAs in closing proficiency gaps for students with IEPs.

Identification & Correction of Noncompliance & Corrective Action Plans

When a state education agency determines that a LEA is out of compliance with an applicable IDEA requirement (that is, a compliance level is less than 100%), the state must issue a written notification of noncompliance, or finding, to the LEA in a timely manner (generally within three months). A written notification is not required where a noncompliant LEA immediately corrects the identified noncompliance, and the state is able to verify the correction. In other instances, correction of noncompliance must occur as soon as possible, but no later than one year after the state's written notification of noncompliance. The state education agency must verify that the LEA has, where applicable, corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements based on a review of updated data and information, such as data subsequently collected through integrated monitoring activities or the state's data system. The state must also maintain documentation of evidence demonstrating that the LEA has corrected each individual case of the previously noncompliant files, records, data files, or whatever data source was used to identify the original and that the review of updated data and information did not reveal any continued noncompliance.³⁹⁵

DMTE activities through any type of monitoring may result in a CAP for the LEA and CAP procedures are consistent regardless of how noncompliance was identified within a LEA. OSEEL has developed detailed standard-operating procedures for the determination of noncompliance, requirements for CAPs, and closure of CAPs within one-year of the citation of noncompliance in a LEA. Once a CAP has been initiated for a LEA, OSEEL uses a CAP tracking system to monitor the status of correction for each LEA with an active CAP.

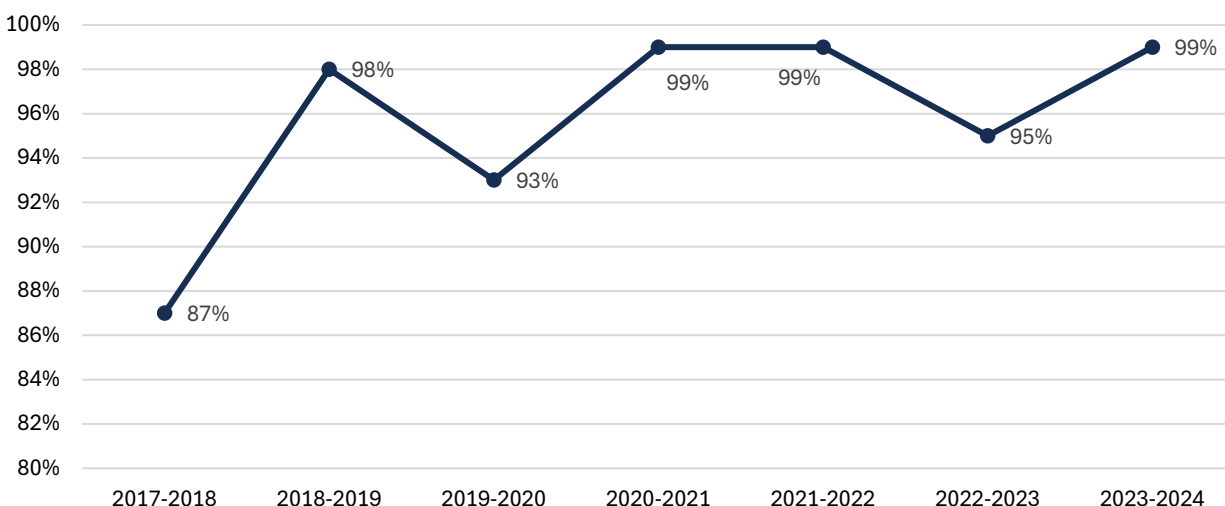
OSEEL's processes are consistent with OSEP requirements and guidance to ensure the correction of all noncompliance at the systemic and student record level within one year of identification. OSEEL provides LEAs with a CAP template that addresses each instance of student level or systemic noncompliance, outlines action steps and activities, identifies the required evidence of completion, and provides timelines for required activities. A LEA must complete a CAP template for each area of noncompliance. As a result, some LEAs have multiple CAPs during the same school year.

As LEAs complete the required corrective actions, OSEEL DIMR staff assigned to support the LEA through the correction process note updates for each activity and timeline within the CAP and provide ongoing feedback to the LEA regarding the designated corrective actions. OSEEL defines systemic noncompliance as less than 95% compliance with a specific regulatory requirement. For an instance of systemic noncompliance, the LEA is required to engage in a root cause analysis process prior to the development of CAP activities to ensure the activities are aligned to the problem area and are reasonably determined to improve compliance in that area.

A review of historic data between 2017-2018 and 2024-2025 reflects OSEEL issues approximately 40 to 98 CAPs to LEAs per year. As of the time of this report, OSEEL has issued 36 total CAPs during the 2024-2025 school year. On average, 96.3% of CAPs are closed within one year of the identification of noncompliance with a regulatory requirement in an LEA. Figure 134 illustrates the closure rate of CAPs within one year after issuance.

³⁹⁵ "Guidance on state general supervision responsibilities under Parts B and C of IDEA." U.S. Department of Education, Office of Special Education and Rehabilitation Services. July 24, 2023.
https://sites.ed.gov/idea/files/Guidance_on_State_General_Supervision_Responsibilities_under_Parts_B_and_C_of_IDEA-07-24-2023.pdf

FIGURE 134: CAP CLOSURE RATES: PERCENTAGE OF CAPs CLOSED WITHIN ONE YEAR



Source: Data provided by the Kentucky Department of Education, “51 OSEEL CAP_Tracker.” CAP Closure rate reflects the percentage of total CAPs closed within one-year of noncompliance notification by KDE.

- Most CAPs are generated from desk audits with 82 CAPs issued in the past three school years (2022-2023 through 2024-2025).
- Indicator 13 Secondary Transition was the most common area of noncompliance requiring corrective action with 13 CAPs issued in 2022-2023, 23 CAPs in 2023-2024, and 19 CAPs in 2024-2025.
- Noncompliance identified because of the complaint process was the second highest area of noncompliance with ten CAPs issued in 2022-2023, 19 CAPs in 2023-2024 and five as of the time of this report in 2025.

Over an eight-year period from 2017-2018 through the current 2024-2025 school year, 11 school districts averaged at least one or more CAP per year.

- Daviess County Public Schools, Fulton County School District, Boone County Public Schools, and Jefferson County Public Schools each totaled over ten CAPs during this period with Jefferson County having the most CAPs at 17.
- One hundred seventeen LEAs had at least one CAP during the past three school years, 2022-2023 through 2024-2025.

Figure 135 provides a breakdown of CAPs and LEAs cited for noncompliance by year.

FIGURE 135: CAPs ISSUED FOR NONCOMPLIANCE 2017-2025

School Year	Number of CAPs Issued	Number of LEAs with at least one CAP	Number of LEAs with two or more CAPs
2017-2018	41	30	10
2018-2019	61	43	10
2019-2020	63	42	15
2020-2021	97	77	17
2021-2022	98	73	18
2022-2023	63	51	11
2023-2024	89	69	16
2024-2025	38	31	6

Source: Data provided by the Kentucky Department of Education, "51 OSEEL CAP_Tracker."

Dispute Resolution

State general supervision systems must be designed to collect and analyze dispute resolution information, determine whether systemic noncompliance is occurring, issue findings of noncompliance and ensure correction. In determining whether noncompliance exists, the state must examine each due process hearing decision to determine if the decision identifies any procedural or substantive violations of the IDEA in the LEA as well as ensure each due process hearing decision is implemented and any violations corrected within the timeframe specified by the hearing officer. Where patterns are present in state complaint decisions and due process decisions, the state is responsible for determining whether systemic noncompliance is occurring and for issuing written findings of noncompliance to ensure correction. Information from a state's dispute resolution system can also support the state education agency with the identification of statewide needs for guidance, training, or technical assistance.³⁹⁶

Kentucky uses a two-tiered due process system and provides information about mediation, formal written complaints, and due process hearing on the KDE Special Education web page. The webpage provides descriptions of mediation, formal written complaints, and due process hearings with associated forms for each process linked on the page as well as contact information for OSEEL, KDE's Office of Legal Services, and contact information for educational advocacy and legal services organizations in Kentucky.

The agency provides a Quick Guide to Special Education Dispute Resolution Processes for students ages three to 21 in English, Spanish, Arabic, and Swahili. Some linked documents such as Formal Written Complaint form are labeled in English and Spanish, however, links to most documents in languages other than English are labeled only in English. Further, the text of the Dispute Resolution website that describes the use of the linked materials only written in English. It is therefore unclear to what degree a family member without English proficiency can reasonably access the information provided.

All U.S. states are required to report data related to dispute resolution, including the resolution of complaints and number of mediation sessions conducted annually, as part of the SPP/APR submission to OSEP. The

³⁹⁶ "Guidance on state general supervision responsibilities under Parts B and C of IDEA." U.S. Department of Education, Office of Special Education and Rehabilitation Services. July 24, 2023. https://sites.ed.gov/idea/files/Guidance_on_State_General_Supervision_Responsibilities_under_Parts_B_and_C_of_IDEA-07-24-2023.pdf

data collected for Indicator 15 Resolution Sessions and Indicator 16 Mediations is previously reported data in the IDEA Part B Dispute Resolution Survey in the USED Facts Metadata and Process System (EMAPS).

Figure 136 below summarizes the number of resolution sessions and mediation requests for the SPP/APR year and corresponding EMAPS data year. Kentucky had the greatest number of resolutions (26) in 2020 and the smallest number of mediation requests (4) in 2022. The greatest number of mediations occurred in 2024 (15) while the lowest number of mediation sessions (5) were held in 2022.

FIGURE 136: DISPUTE RESOLUTION & MEDIATION REQUESTS 2019 - 2024

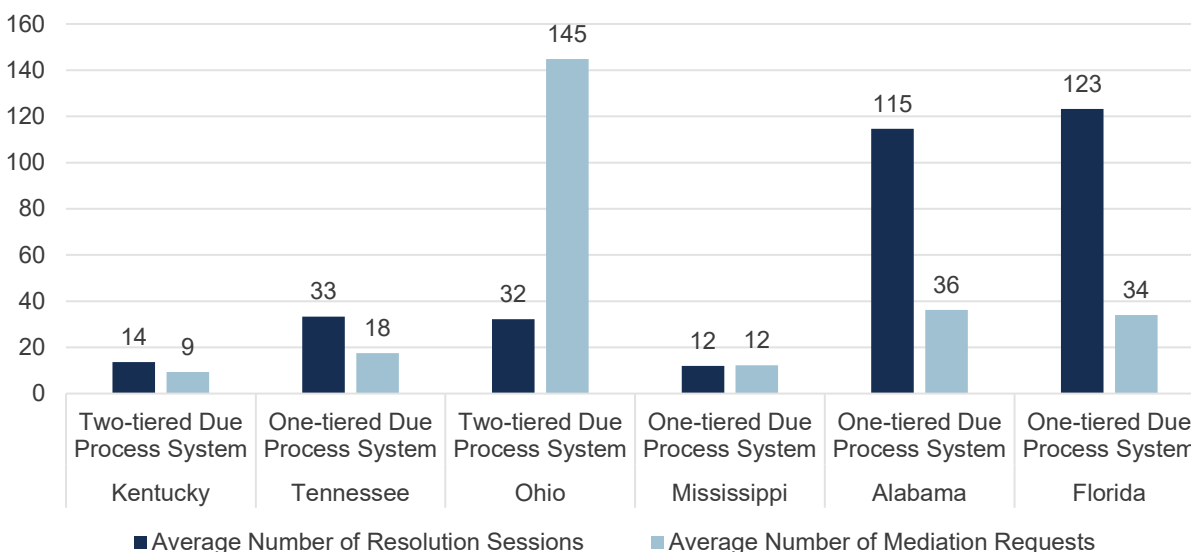
SPP/APR Report Year	Number of Resolution Sessions	Number of Mediation Requests	Data Source
2019	22	6	SY 2017-2018 EMAPS IDEA Part B Dispute Resolution Survey
2020	26	9	SY 2018-2019 EMAPS IDEA Part B Dispute Resolution Survey
2021	14	12	SY 2019-2020 EMAPS IDEA Part B Dispute Resolution Survey
2022	4	5	SY 2020-2021 EMAPS IDEA Part B Dispute Resolution Survey
2023	10	9	SY 2021-2022 EMAPS IDEA Part B Dispute Resolution Survey
2024	6	15	SY 2022-2023 EMAPS IDEA Part B Dispute Resolution Survey

Source: Data retrieved from EMAPS IDEA Part B Dispute Resolution surveys.

Kentucky's dispute resolution numbers are relatively low when compared to other states. Comparative dispute resolution data between Kentucky and peer states for 2019-2024 is summarized in Figure 137.³⁹⁷

³⁹⁷ "State Performance Plans (SPP) Letters and Annual Performance Report (APR) Letters." U.S. Department of Education, IDEA. <https://sites.ed.gov/idea/spp-apr-letters>

FIGURE 137: 2019-2024 DISPUTE RESOLUTION COUNTS FOR KENTUCKY & COMPARISON STATES



Source: Retrieved from the U.S. Department of Education, IDEA's "State Performance Plans (SPP) Letters and Annual Performance Report (APR)." <https://sites.ed.gov/idea/spp-apr-letters>

Additionally, as summarized in Figure 138 below, the State of Oklahoma has similar overall statewide student enrollment and percentage of students with IEPs served in public schools to Kentucky with similar dispute resolution outcomes. As of 2022, Oklahoma served 701,301 students of which about 17% were students with disabilities.³⁹⁸ In the same year, Kentucky served 660,029 total students, about 17% of which were students with disabilities.³⁹⁹

³⁹⁸ "Digest State Dashboard: Oklahoma." National Center for Education Statistics. May 2024. <https://nces.ed.gov/programs/digest-dashboard/state/oklahoma>

³⁹⁹ "Digest State Dashboard: Kentucky." National Center for Education Statistics. May 2024. <https://nces.ed.gov/programs/digest-dashboard/state/kentucky>

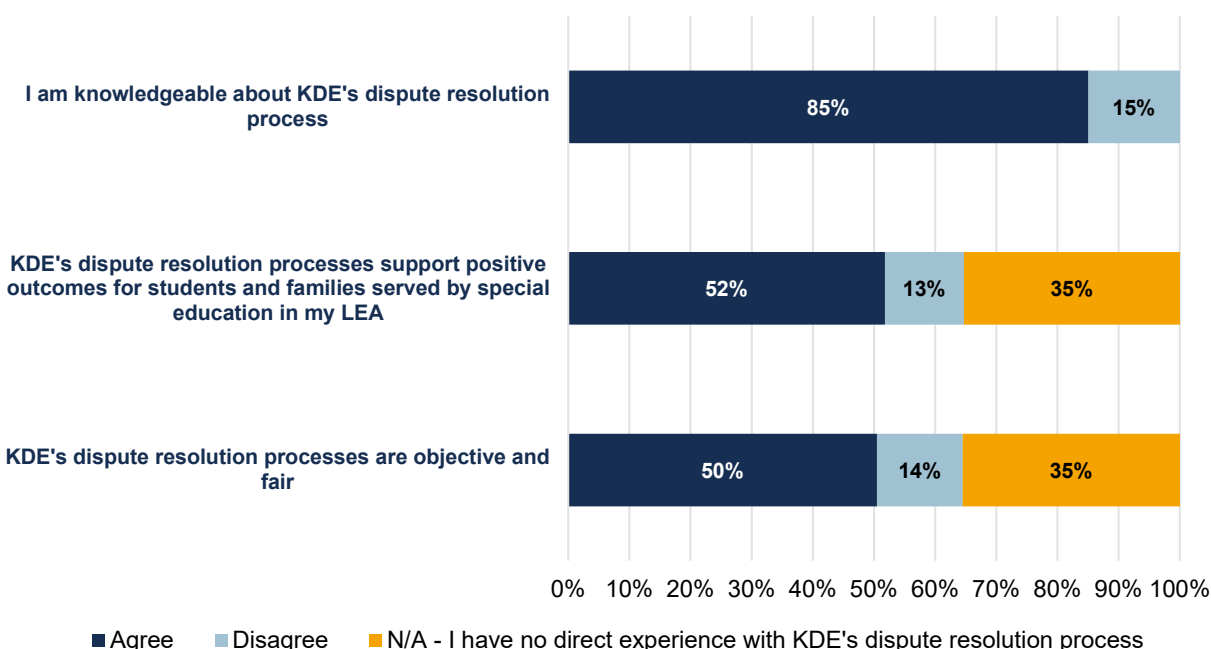
FIGURE 138: DISPUTE RESOLUTION COMPARISON: KENTUCKY & OKLAHOMA

	Kentucky	Oklahoma
2022 Student Population	660,029	701,301
2022 Percentage of Students with Disabilities	16.6%	17.2%
Two-tiered due process system	Yes	Yes
2024 SPP/APR: Number of Resolution Sessions	6	9
2024 SPP/APR: Number of Mediation Requests	15	12
2023 SPP/APR: Number of Resolution Sessions	10	6
2023 SPP/APR: Number of Mediation Requests	9	10
2022 SPP/APR: Number of Resolution Sessions	4	7
2022 SPP/APR: Number of Mediation Requests	5	12
2021 SPP/APR: Number of Resolution Sessions	14	8
2021 SPP/APR: Number of Mediation Requests	12	9
2020 SPP/APR: Number of Resolution Sessions	26	10
2020 SPP/APR: Number of Mediation Requests	9	13

Source: Retrieved from the U.S. Department of Education, IDEA's "State Performance Plans (SPP) Letters and Annual Performance Report (APR)."

LEA special education directors were surveyed about their perceptions of KDE's dispute resolution processes. Questions addressed whether LEAs were knowledgeable of KDE's process and the extent to which they believe the KDE dispute resolution process is fair, objective, and supports positive outcomes for students with disabilities and their families. Survey results about LEA special education director perceptions of dispute resolution in Kentucky are summarized in Figure 139.

FIGURE 139: LEA PERCEPTIONS OF KDE'S DISPUTE RESOLUTION PROCESS



Source: Data retrieved from the Special Education Director Survey. Percentages may not add to 100% due to rounding.

Most special education directors are knowledgeable about KDE's dispute resolution process. Of those who are knowledgeable, 77% agree that the processes are fair and objective and 80% feel KDE's dispute resolution processes support positive outcomes for students and families served by special education. Additionally, across focus groups conducted with a variety of KDE staff, when asked about the relatively lower number of special education complaints in Kentucky, the perception surfaced that LEAs are able to locally manage relationships with families (including concerns about student IEPs and programs that arise) and that they generally provide quality special education programs for students.

Kentucky demonstrates lower numbers of state complaints and mediations in comparison to several other states; however, Mississippi and Oklahoma report similar levels of dispute resolution activity to Kentucky.

Based on survey data collected from LEA special education directors, most LEAs report to be knowledgeable about the state's dispute resolution process and believe the process to be fair and objective. KDE makes its dispute resolution process available on its website with supporting resources and in multiple languages. Ultimately, the degree to which families feel the need to escalate concerns about their child's special education needs and program for intervention beyond the local level are influenced by the degree of support families experience within their child's school or local district. Where families are able to resolve concerns at the local level and/or through standard IEP meeting processes, there would not be a need for state intervention. Additionally, institutional trust and local culture are factors that influence the degree to which families voluntarily choose to access state dispute resolution systems and these factors also vary across dimensions of state and regional diversity.

10.2 Observation: The KDE special education dispute resolution webpage provides linked documents and materials only in English or Spanish, limiting the accessibility of families without English or Spanish proficiency.

The language of written materials on the KDE dispute resolution web site may limit the degree to which a family member without English proficiency can reasonably access the information. While KDE provides dispute resolution documents for families in languages other than English, the text of the KDE dispute resolution website is provided only in English. Quick guides to the dispute resolution process are provided

in Spanish, Arabic, and Swahili, however, the respective links to these documents are labeled in English. Some documents are provided in Spanish as well as English, however, in the absence of meaningful descriptive text in Spanish, it is not likely a parent or family member who is not English proficient could easily make use of the dispute resolution materials provided by KDE.

- 10.2.a Recommendation:** KDE should provide dispute resolution resource documents and their respective hyperlinks in both English and a variety of languages on the KDE website to provide access for stakeholders whose primary language is not English.

Fiscal Management

A state's general supervision systems include fiscal monitoring of IDEA Part B fiscal requirements including:

- LEA compliance with IDEA maintenance of effort provisions (34 C.F.R. §§ 300.203–300.205)
- LEA's expenditure of a proportionate share of IDEA funds to provide equitable services to children with disabilities placed in private schools by their parents consistent (34 C.F.R. § 300.133)

OSEEL monitors LEA usage of IDEA-B Section 611 formula grants for students ages three to 21 and IDEA-B Section 619 formula grants for preschool students ages three to five. An IDEA Fiscal Monitoring Manual was published in 2023 and is publically available on the KDE website. OSEEL IDEA Fiscal Monitoring focuses on indicators of compliance related to:

- Obligation and Liquidation
- Use of Funds
- Level of Effort
- Correction of Noncompliance

OSEEL uses Enterprise ERP/MUNIS (EERP), the state's fiscal management software, to support fiscal monitoring activities under the IDEA. This system assigns project numbers to identify all federal funds controlled by the LEA with separate accounts for Section 611 and Section 619 funds. LEAs are required to submit quarterly summary finance reports that detail their expenditures during that period. Additionally, OSEEL may initiate desk reviews or on-site reviews to conduct fiscal monitoring activities with LEAs. The determination for monitoring is based upon fiscal information from independent single audits, data from the LEA's Maintenance of Effort compliance forms, quarterly reports, budgets or other fiscal documents, and risk information determined via the OSEEL Risk Management Tool.

LEAs are required to have independent single audits of major programs each year. Major programs are determined based on the amount of funds in a particular program for the specific year being audited. The audits are conducted by auditors approved by the state and reports of the audits are submitted to various offices within KDE. Independent auditors test LEA policies, procedures, and practices against Office of Management and Budget (OMB) Guidance for Grants and Agreements and general fiscal principles across programs. If audit exceptions are discovered, OSEEL is notified by Office of Finance and Operations Federal Budget Branch and KDE has six months to resolve findings.

If a fiscal desk review is initiated based on an independent single audit or other information source, OSEEL conducts a review that includes:

- Virtual interviews of fiscal and special education staff regarding practices and procedures related to fiscal management
- MUNIS information
- Independent single audit data
- Quarterly reports
- Annual GMAP applications and award letters
- Federal Cash requests
- LEA Maintenance of Effort eligibility and compliance
- Model procurement standards and procurement process

- LEA fiscal policies and procedures
- Employee salary benefits schedule
- Time/effort documentation and personnel activity reports
- Physical inventories (MUNIS and LEA)
- Travel approval/reimbursement processes
- Other fiscal information available

Following the review, an exit conference with OSEEL, the LEA staff from initial interviews, and the LEA's superintendent occurs to inform the LEA of results, to provide documentation supporting any conclusions, and to offer the LEA an opportunity to comment or provide additional documentation prior to final compliance determinations.

IDEA fiscal monitoring conducted by OSEEL may result in no findings, noncompliance requiring a CAP, LEA repayment of funds, withholding of LEA funds pending correction of particular areas of noncompliance, or finding an LEA ineligible to receive IDEA funds if the identified noncompliance demonstrated the LEA's ineligibility for its subgrant or if the LEA did not correct identified noncompliance within the required timelines.

OSEEL piloted an IDEA fiscal monitoring process in 2019. An initial training on the roll-out of fiscal monitoring first occurred in the spring of 2021. Beginning in 2022, KDE started providing annual training about IDEA fiscal monitoring and published an IDEA fiscal monitoring manual in 2023. In school year 2022-2023, 12 LEAs were monitored for IDEA fiscal requirements, resulting in nine CAPs. In 2023-2024, nine LEAs were monitored for IDEA fiscal requirements and ten CAPs for fiscal noncompliance were issued. In 2024-2025, nine LEAs are scheduled for fiscal monitoring with two CAPs issued to date.

Special Education Trust Fund

10.3 Finding: KDE lacks procedures for managing funds withheld from noncompliant LEAs in the special education trust fund as required by KRS 157.224(5).

KRS 157.224(5) established a special education trust fund to receive funds withheld from LEAs who fail to operate and implement special education programs in accordance with the standards of the Kentucky Board of Education outlined in KRS 157.224(2). KDE may withhold funds from a LEA as a consequence of noncompliance with the requirements necessary to provide students with a free appropriate public education under the IDEA. In circumstance when funds are withheld, the withheld funds must not lapse, must accrue interest and be returned to the LEA when compliance with the necessary requirements is demonstrated. KDE was unable to provide documented evidence of procedures or processes necessary to implement this requirement.

10.3.a Recommendation: KDE should develop implementation processes and procedures aligned to KRS 157.224(5) for the withholding of LEA funds due through a special education trust fund. After processes and procedures are developed, OSEEL should implement such processes and procedures for any circumstance in which LEA funds are withheld due to the LEA's failure to meet the required special education program standards.

Significant Disproportionality

States are required to collect and analyze data to determine if significant disproportionality based on race and ethnicity exists in the identification, placement, or discipline of children with disabilities. Using a standardized methodology, states set thresholds to identify LEAs with significant disproportionality. When a LEA is identified, it must allocate 15% of its IDEA Part B funds to implement comprehensive coordinated early intervening services (CCEIS) to address contributing factors. The state must then monitor the LEA to ensure compliance and report on findings and fund allocations annually to OSEP. Additionally, the state must review and may require revisions to the LEA's policies, procedures, and/or practices that contribute to significant disproportionality. If noncompliance is identified, it must be corrected within one year.

States are required to establish risk ratios for determining whether significant disproportionality exists in a LEA. A risk ratio is a calculation conducted by dividing the risk of an outcome for a specific group of students

in a racial or ethnic group in a LEA by the risk for students in all other racial or ethnic groups in the same LEA. A risk threshold is determined at the state level. A LEA who exceeds the risk threshold for any area reviewed is determined to demonstrate significant disproportionality.⁴⁰⁰

Kentucky has established a risk ratio of 3.00. To be identified for significant disproportionality, the risk ratio must exceed the 3.00 threshold for the same category and for the same race/ethnicity for three consecutive years. After a LEA is identified, that LEA may be excluded from identification if, over the three-year period, data collected shows reasonable progress reflected by a 0.05 decrease in the risk ratio for each of the last two years examined. If the LEA's race/ethnicity data being analyzed does not meet the minimum cell or n-size requirements for the state's risk ratio, significant disproportionality cannot be calculated, and an alternate risk ratio is applied. When using an alternate risk ratio, the LEA data for the race/ethnicity being examined is compared to state-level data for students who are not of that race/ethnicity.⁴⁰¹ Kentucky uses risk ratios for determining the presence of significant disproportionality comparable to other states in the region. Risk ratios in comparison states are as follows:

- **Florida** – 3.00 risk ratio in all areas
- **Ohio** – 2.50 risk ratio in all areas
- **Mississippi** – 2.00 risk ratio in all areas
- **Tennessee** – 3.00 risk ratio in Identification and Educational Environments and 2.0 risk ratio in Discipline
- **Alabama** – 3.00 risk ratio in Educational Environments, 4.0 risk ratio in Identification, and 5.0 risk ratio in Discipline

Nine LEAs were identified by OSEEL as experiencing significant disproportionality in 2024-2025.

- In seven of the nine LEAs, disability identification was the area of significant disproportionality:
- Two LEAs based on over-identification of white students with intellectual disabilities
- Two LEAs based on over-identification of Black or African American students with intellectual disabilities
- Two LEAs based on over-identification of white students with Specific Learning Disabilities
- One LEA based on over-identification of white students as students with Other Health Impairments and Emotional Disabilities
- Of the nine LEAs identified with significant disproportionality, six LEAs enroll total student populations under 4,000 students and three had total student enrollments of 12,000 or more.
- The remaining two LEAs were identified as meeting the criteria for significant disproportionality based on disciplinary removals of Black or African American students with disabilities.
- Both LEAs where student discipline was the identified area of significant disproportionality enroll over 40,000 total students.

OSEEL's Fiscal Monitoring Manual (2023) outlines LEA requirements for the use of coordinated early intervening services (CEIS) and CCEIS. LEAs who have not been identified with significant disproportionality under the state's risk ratio and thresholds may voluntarily set aside up to 15 percent of their IDEA-B funds annually to provide CEIS to students in kindergarten through grade 12 who are not presently identified as needing special education, but who do need additional academic and/or behavioral supports to be successful in the general education setting. Allowable use of these funds includes provision of professional development for teachers and staff to provide academic or behavioral interventions and

⁴⁰⁰ "Significant Disproportionality: Questions and Answers." U.S. Office of Special Education Programs. March 8, 2017. <https://sites.ed.gov/idea/files/significant-disproportionality-ga-03-08-17.pdf>

⁴⁰¹ "Significant Disproportionality and Comprehensive Coordinated Early Intervening Services (CCEIS)/Coordinated Early Intervening Services (CEIS)." Kentucky Department of Education. March 17, 2025. <https://www.education.ky.gov/specialed/excep/MonitoringnResults/Pages/CEIS.aspx>

provision of educational and behavioral evaluations, services, and supports.⁴⁰² OSEEL maintains a live form on its web site for LEAs to indicate a voluntary set aside of CEIS funds.

If a LEA demonstrates significant disproportionality under the state's risk ratio and 3.00 threshold, upon notification of the presence of significant disproportionality, the LEA is required to set aside 15 percent of its IDEA funds by August 1st of the year immediately following the notification. The LEA is required to identify and address the factors contributing to significant disproportionality such as access to scientifically based instruction or the LEA's policies, procedures, or practices. Funds may also be used to provide professional development and educational or behavioral services to students in kindergarten through grade 12 including students with disabilities as well as students without disabilities who need additional support to access the general education setting.⁴⁰³ LEAs determined to be significantly disproportionate are required to complete the following activities:

- CCEIS Improvement Plan
- CCEIS Strategic Quarterly Plan
- KDE Policy, Practice, and Procedure Review Matrix
- KDE CCEIS Funding Matrix
- CCEIS Flagging in Infinite Campus
- If the LEA was significantly disproportionate in Identification, the LEA must complete either the IDC Success Gaps Rubric or WestEd Assessing Special Education Rubric
- If the LEA was significantly disproportionate in Discipline, the LEA must complete either Behavior Implementation Plan Evaluation or WestEd Assessing Special Education Rubric

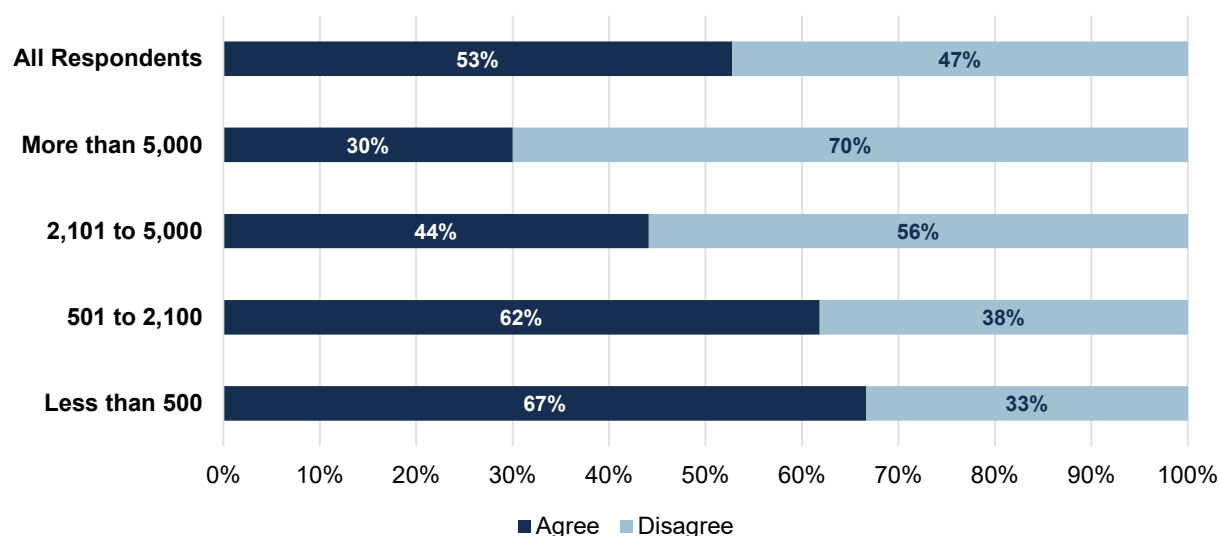
OSEEL provides training and ongoing technical assistance to LEAs who are required to allocate 15 percent of IDEA-B funds to CCEIS activities. A core group consisting of a minimum of three LEA staff must be identified and engage in initial CCEIS training sessions and subsequent related sessions as well as technical assistance activities. LEA staff who participate as members of the core group must represent special education, instruction and/or behavior. Initial CCEIS trainings are held in August and differentiated for continuing LEAs and LEAs who are new the process. Mid-year check-ins on progress are held between OSEEL and participating LEAs in February and March with ongoing Professional Learning Communities focused on the LEAs area of significant disproportionality occurring between September and March. LEAs may also request additional support meetings with KDE throughout the year as needed. OSEEL staff maintain a log of each required CCEIS activity and required submission noted in the list above. Technical assistance and support are also provided to LEAs who opt to voluntarily set aside CEIS funds. LEAs who opt-in to engage in check-in calls with OSEEL, however, do not participate in the activities required of LEAs who are required to set aside funds (e.g., root cause analysis, improvement planning, or professional development).

10.4 Observation: Large LEAs with more than 5,000 students enrolled may require differentiated support from the Department related to disproportionality in special education.

⁴⁰² "Individuals with Disabilities Education Act (IDEA) Fiscal Monitoring Manual." Kentucky Department of Education, Office of Special Education and Early Learning. 2023.
https://www.education.ky.gov/specialed/except/MonitoringnResults/Documents/OSEEL_IDEA_Fiscal_Monitoring_Manual_2023.pdf

⁴⁰³ Ibid.

FIGURE 140: KDE PROVIDES HIGH-QUALITY SUPPORT THAT AIDS MY LEA IN REDUCING DISPROPORTIONALITY IN SPECIAL EDUCATION



Source: Data retrieved from the Special Education Director Survey.

Roughly half of LEA special education directors surveyed indicated they did not agree that OSEEL provides high-quality support in reducing disproportionality in special education. LEAs with student enrollment of over 5,000 students expressed this sentiment most prevalently with only 30% of LEA special education directors from large LEAs indicating the state provides high-quality support in this area. LEAs with smaller student enrollments, however, expressed positive sentiment about the support they received from OSEEL to reduce disproportionality. LEAs who have student populations of less than 500 indicated a 67% satisfaction rate.

Although survey results reflect a notable distinction in perception of state supports for significant disproportionality between small and large LEAs, a review of technical assistance support logs provided by KDE indicate LEAs with fewer enrolled students and LEAs with large numbers of enrolled students have been provided with similar frequency and volume of state technical assistance related to significant disproportionality.

Survey response data in this area may reflect that there are challenges related to significant disproportionality not captured through the current state data review processes, a need for more differentiated support based on district size and need, some degree of each of these scenarios, or some other need altogether that is not currently addressed in the state's systems.

10.4.a Recommendation: KDE should conduct targeted engagement efforts with stakeholders from LEAs with more than 5,000 enrolled students to understand the distinct needs of the district related to significant disproportionality in special education.

10.4.b Recommendation: KDE should use data from targeted engagements to identify and improve state support systems for LEAs addressing significant disproportionality in special education and implement necessary changes.

Implementation of Policies & Procedures, Technical Assistance, & Professional Development

OSEEL publishes guidance and procedural support materials on its public facing website. These materials are located on the page titled "Guidance and Resources" and includes links to topic specific sub-pages that address topics such as IEP development, instructional resources, special education data systems, and assistive technology among others.

In total, OSEEL provides 358 unique links to guidance and reference materials. Materials include handbooks, guidance documents, procedural forms, checklists, recorded video training, and links to external websites. Most materials focus on compliance related topics while some address specially designed instruction or educational support strategies for students with disabilities. Figure 141 includes the number of published special education resources by topic area.

FIGURE 141: OSEEL SPECIAL EDUCATION PUBLISHED GUIDANCE MATERIALS

Special Education Guidance Documents & Resources	
Topic Area	Number of Resources
Evaluation and Eligibility	63
ARC and IEP	59
Instructional Resources	55
Kentucky Alternate Assessment Participation Waiver	45
Transition Resources	31
SSIP	27
Special Education Resources for Using Infinite Campus (IC)	23
English Learners with Disabilities	17
Participation Guidance	15
Standards and Instruction	12
Assistive Technology	8
Participation in State Assessments for Students with Disabilities	3

Source: Data retrieved from the Kentucky Department of Education website.

Guidance documents and materials posted on the OSEEL web pages are reviewed on a rotating schedule throughout each year. These reviews focus on ensuring published guidance is free of grammar, punctuation, and spelling errors and verification that embedded hyperlinks continue to function. OSEEL's Guidance and Support Branch collects data on the most frequently accessed web pages in an internal monthly report that summarizes this information in addition to email and call log data regarding common technical assistance topics and stakeholder communication.

Resources with instructional support focus developed by KDE, however, generally lack the specificity needed to implement actionable strategies within a classroom. There seems to be little prioritization or guidance around the critical points, intended audience, or use cases for linked external resources across the OSEEL guidance pages. For example, the literacy and Mathematics toolkits provide general best practices and quality rubrics for delivery of instruction, such as the importance of communicating learning goals to the student. Effective communication of a learning goal to a student with a disability varies depending on a learner's profile and disability-related needs. The guidance provided, however, is insufficient on its own to change instructional practice because while it describes optimal practices it does not clearly delineate the context or type of data that indicates when a specific practice is recommended and, in many cases, does not illustrate clearly how to implement the instructional practice.

10.5 Finding: OSEEL's state policy and guidance documentation on the KDE website is only provided in English and is not organized to optimize user experience or accessibility.

- **The organizational structure of the guidance web pages may not be optimized for users who are unfamiliar with KDE resources.** For example, "Participation in State Assessments for Students with Disabilities" contains only three links and each link redirects the user to a different sub-page of the OSEEL Guidance and Resources page. The redirection to various sub-pages may cause a user undue confusion and frustration while searching for guidance or materials. This

experience may prevent the user from locating the information they are searching for due to the level of frustration.

- **Some web-based resources are not current and should be removed or updated.**
- **Updated and current resources are crucial for the elimination of user confusion and reliance on non-governing or irrelevant information.** However, despite a rotating review schedule, some resources were published over ten years ago and provide information that is redundant with more recently published materials, or while technically accurate, do not reflect modern practices.
- **The documents “Staff/Teacher IEP Information Brochure,” “Getting Ready for ARC Meetings: A Checklist for Students,” and “The IEP: A Student’s Guide” were each published in 2003 or 2004. The information for staff within these documents is addressed in OSEEL documents published in April 2025 including “The Special Education Process,” and “Guidance for IEP Development.”** The student-facing materials, while technically accurate and aligned to the IDEA, reference dated practices and technologies such as tape recorders and CDs. Other materials such as COVID-19 response documents may not be aligned to current school and district procedures and practices.
- **Resources for multilingual users are only labeled in English, limiting the ability of intended non-English proficient audiences to locate and use the resource.** While resources related to Child Find and special education procedural safeguards are provided in multiple languages, the documents are titled and labeled in English and it is unclear how a speaker/reader of another language, such as a parent or family member, would be able to locate the materials in their home language.

10.5.a Recommendation: KDE should review, update, organize, and condense website materials related to special education for all appropriate audiences, including resources in multiple languages, and ensure all policy guidance and resources are accessible and align with regulatory requirements, research, and best practices.

10.6 Finding: The processes for providing special education technical assistance to LEAs and other stakeholders, including parents of students with disabilities, are inefficient and require oversight that slow down KDE’s stakeholder response time.

OSEEL staff provide ongoing technical assistance to LEAs and their staff through email and phone support. Contact information is listed on OSEEL pages of the KDE website. OSEEL staff are assigned as leads for specific indicator and topic areas. Internal guidance and data gathered through focus groups with KDE staff indicate OSEEL staff are expected to respond to a request for support within 24 hours of a call, voice message, or email. In some cases, this response may indicate the need for a longer window of time to research and provide a more detailed response. Specific timelines for responding to a requestor in these instances are unclear. OSEEL staff, however, report they respond to each requestor for assistance as soon as possible.

Written guidance is provided to OSEEL staff to support the technical assistance process, which includes supervisory approvals as needed. Prior to dissemination of a written response to a requestor, all written technical assistance responses must adhere to the KDE Style Guide and be reviewed by a minimum of two additional consultants beyond the assigned author as well as the next-line supervisor. Requests for guidance on certain topics such as shortened school days, charter schools, and mechanical restraint require the branch manager to be notified before a response is provided.

All technical assistance provided is logged by OSEEL staff in a spreadsheet that documents the title of the request, method of provision (phone, email, etc.), topic, assigned OSEEL staff member, and dates assigned and closed. Written responses are cataloged within a Microsoft OneNote technical assistance bank. This bank is available to OSEEL staff to search when responding to future inquiries. Entries are archived after two years and removed after five years. The most frequently cited regulations in OSEEL technical assistance provided are:

- 707 KAR 1:320 – IEP
- 707 KAR 1:300 – Child Find, Evaluations, Reevaluations

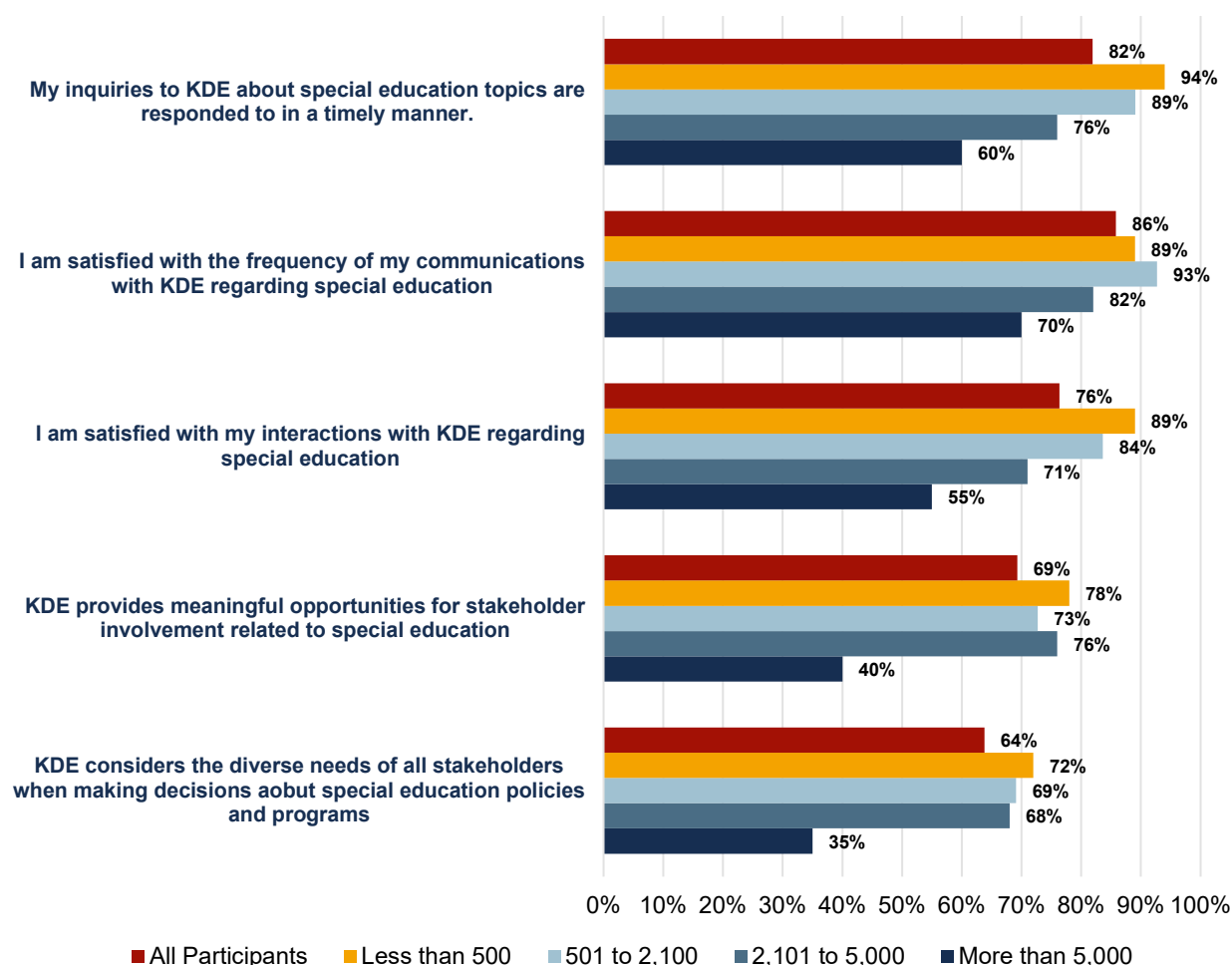
- 707 KAR 1:310, Section 1 (1) – Eligibility Regulation
- 707 KAR 1:320, Section 5(2) – IEP and ARC considerations

Technical assistance is provided to LEA staff as well as families/parents of students with disabilities served in Kentucky LEAs—with approximately 50 percent of inquiries to KDE coming from families and 50 percent of inquiries from LEA staff members. OSEEL staff provide approximately 40 pieces of written guidance to stakeholders per month. Between November 2023 and November 2024, OSEEL staff logged 1,396 technical assistance responses to stakeholders with 931 responses (approximately 68 percent) related to the requirements of IDEA.

Additionally, a weekly publication for directors of special education, “News You Can Use,” is provided on a SharePoint site for directors. The purpose is to provide information for directors so they can follow up if needed. All OSEEL divisions can provide submissions to “News You Can Use” by submitting materials to their leadership for approval. These submissions are then provided to the division’s communication lead to be inputted into an internal OneNote document for review by senior staff. Senior staff then formats the newsletter and provides the final copy to the Associate Commissioner for dissemination. There is also an OSEEL Quarterly Newsletter that includes updates for statewide stakeholders. Indicator or content/topic leads can submit materials for this newsletter through their Branch Manager during weekly meetings.

LEA special education directors were surveyed regarding their perceptions of interactions with KDE regarding special education. Survey items asked LEA special education directors to identify the degree to which they perceived KDE support to be timely and impactful. Results of survey responses are summarized in Figure 142.

FIGURE 142: SPECIAL EDUCATION DIRECTORS INTERACTIONS WITH KDE



Source: Data retrieved from the Special Education Director Survey.

Three quarters of special education directors are satisfied with their interactions with KDE regarding special education. Overall, 64% of survey respondents indicated they perceive KDE considers the diverse needs of all stakeholders when making decisions about special education policies and programs. LEA directors in LEAs with student enrollment under 500 students expressed the greatest level of positive satisfaction in this area. Directors in larger LEAs with student enrollment of over 5,000, however, expressed far lower agreement in this area, with only 35% of directors in large LEAs expressing they believe KDE considers the diverse needs of all stakeholders in its decision making.

10.6.a Recommendation: KDE should develop an improved system for tracking special-education-related communications and storing vetted or cataloged responses. Microsoft OneNote is not designed to be a Customer Relationship Management (CRM) system or information database. OSEEL should implement tools, such as a CRM, to streamline the documentation of communication with stakeholders and manage an easily searchable database of vetted/approved responses to common inquiry topics.

10.6.b Recommendation: KDE should revise the internal requirement for KDE to peer review special education guidance by multiple staff members by reducing the number of reviews needed before issuing stakeholder guidance when requested. When using previously disseminated guidance from a shared bank of information, staff should verify the existing guidance aligns to the requestor's need, and if so, provide the guidance. Requirements for multiple rounds of peer and managerial review of previously vetted materials

are not needed. Peer review can be an effective method for quality assuring materials and information accuracy and should be used when developing extended guidance for statewide consumption such as technical assistance manuals, training materials, or state policy documents.

- **New inquiries for which existing guidance is unavailable are a reasonable circumstance for managerial review and approval.** In cases where inquiries do not align with existing KDE guidance or are complex in nature, a collaborative approach is best. In these cases, KDE staff should draft guidance, review that guidance with the appropriate managerial staff and provide a response to the requestor in a reasonable amount of time.
- **KDE staff should maintain frequent communication with LEA staff about open inquiries that require research and response beyond the expected 24-hour turnaround time until such time as the request for information has been completed and provided to the requestor.**

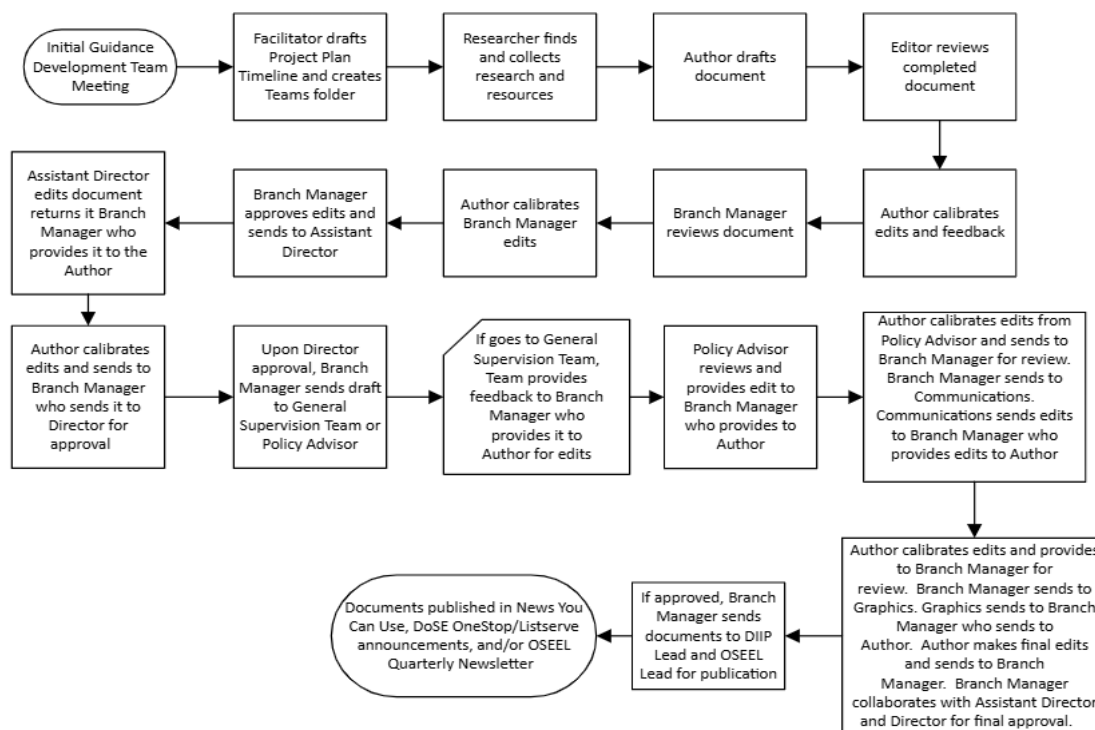
10.6.c Recommendation: KDE should conduct targeted engagement efforts, such as focus groups or listening sessions with special education stakeholders, in LEAs with student enrollment populations larger than 5,000 to gather more information about large district support needs. Use data gathered through targeted engagements to identify continuous improvement areas related to state support systems for LEAs and implement any changes needed to provide such support.

10.7 Finding: KDE technical assistance and professional development on special education topics do not adequately meet the needs of state stakeholders. KDE's internal process for developing and publishing new resource materials does not support timely provision of guidance to stakeholders and includes unnecessary procedures and internal controls.

General guidance is also disseminated using OSEEL quarterly newsletters and formal KDE communications channels such as Listservs. Dissemination of communications through these channels requires several layers of supervisory approval before distribution occurs.

Technical assistance to LEAs is used to determine the need for new statewide guidance documents or materials. If an OSEEL staff member identifies the need for a new resource, a fillable PDF is completed that documents the purpose of the guidance and proposal for creating the new guidance document that identifies the target audience, type of material, and communication plan. The proposal is reviewed by the branch manager, division director, and associate commissioner. If approved, an 18-step development and approval process is initiated beginning with the establishment of a project team and development of a timeline. The project facilitator creates a project plan, monitors the timeline, and communicates with the project team and branch manager throughout the duration of guidance development.

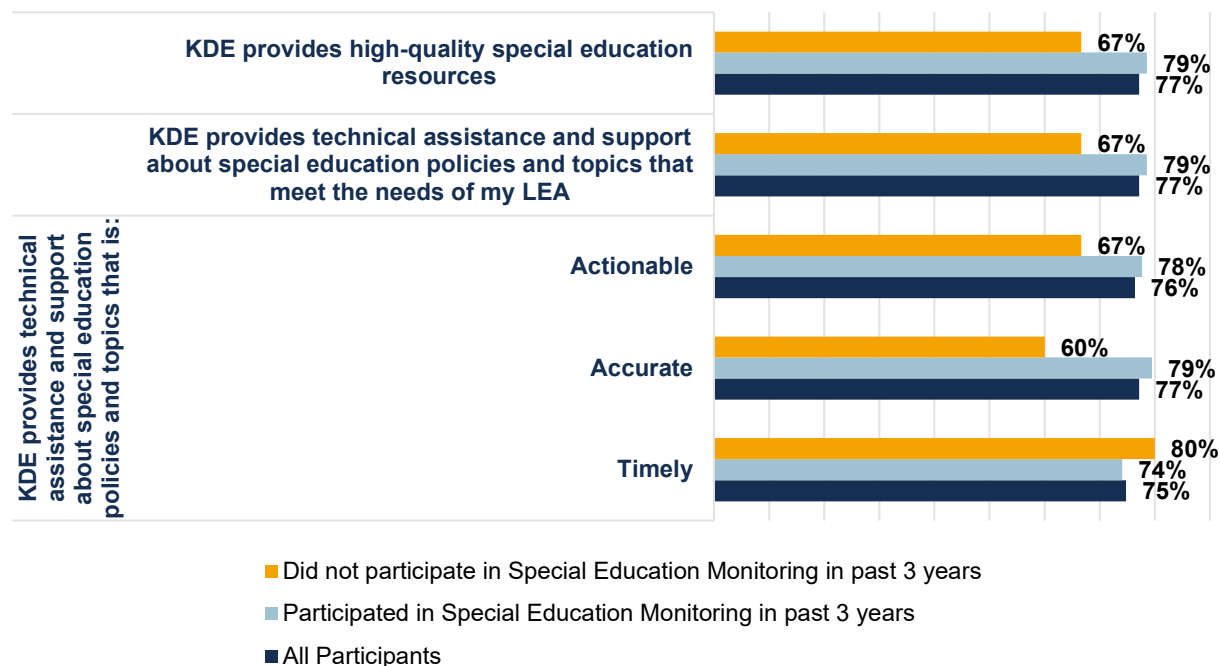
FIGURE 143: OSEEL INTERNAL PROCESS FOR SPECIAL EDUCATION GUIDANCE DEVELOPMENT



Source: Kentucky Department of Education, "OSEEL GSB Procedure for Guidance Development."

LEA special education directors across Kentucky were surveyed to understand perceptions about the quality and usefulness of OSEEL special education guidance and resources. The results of the survey are displayed in Figure 144.

FIGURE 144: KDE SPECIAL EDUCATION RESOURCES & TECHNICAL ASSISTANCE

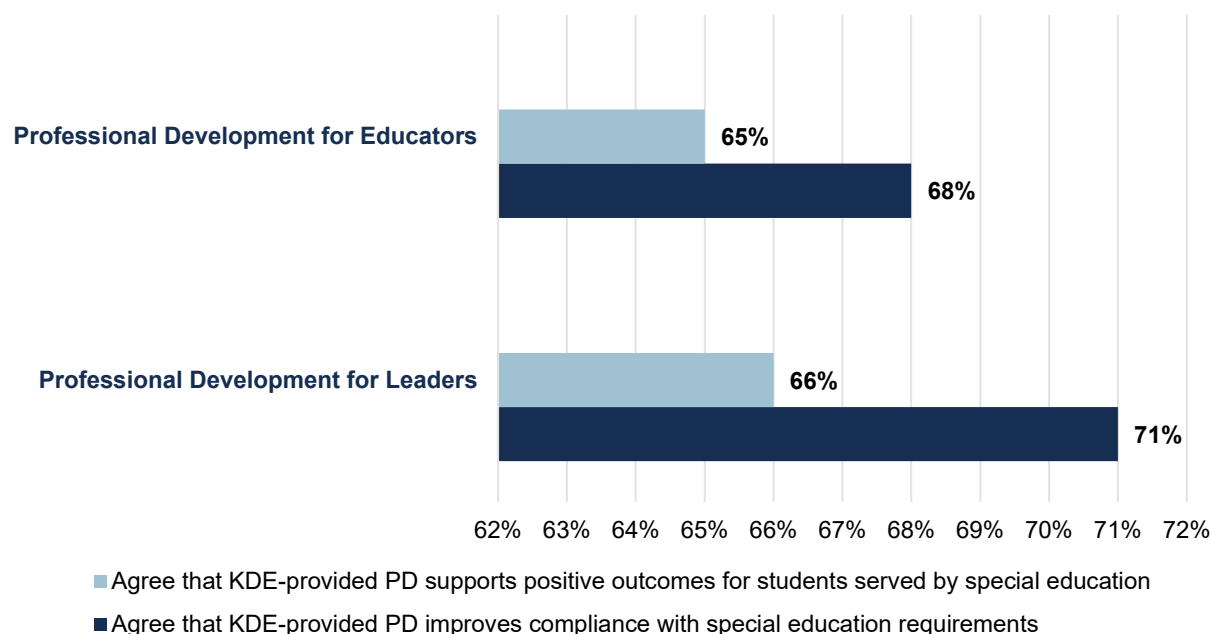


Source: Data retrieved from the Special Education Director Survey.

Overall, 77% of special education directors agree that KDE provides technical assistance and support about special education policies and topics that meet the need of their LEA, and the same number agree that they provide high-quality special education resources. They generally agree that the technical assistance they receive is actionable, timely, and/or accurate. Those that have not participated in special education monitoring recently were less likely to agree with the statements regarding KDE resources and technical assistance outside of the technical assistance they receive being timely.

Similarly, LEA special education directors were asked in the same survey about perceptions of KDE provided professional development related to special education topics. Figure 145 represents the responses of LEA special education directors.

FIGURE 145: AGREEMENT ON KDE-PROVIDED PROFESSIONAL DEVELOPMENT FOR EDUCATORS IN IMPROVING COMPLIANCE & SUPPORTING STUDENTS



Source: Data retrieved from the Special Education Director Survey.

Of special education directors who have experience with KDE-provided professional development for leaders and educators, 65% to 70% believe that it improves compliance with special education requirements and/or that it supports positive outcomes for students served by special education. Either 11% (leaders) or 13% (educators) of special education directors did not have direct experience with KDE-provided professional development. Special education directors in LEAs that enroll fewer than 500 students indicated stronger levels of agreement that KDE provided professional development supports positive outcomes for students with disabilities and improves compliance with special education requirements. Directors in LEAs that enroll over 5,000 students expressed greater levels of disagreement regarding the impact of KDE special education professional development.

OSEEL continues to receive a high volume of inquiries from stakeholders—almost 70% of which are related to the requirements of the IDEA. Such a high percentage indicates current guidance is insufficient as a means of informing stakeholders about these requirements. Perceptions of KDE-provided professional learning by LEA special education directors indicates a need for improved quality training for educators related to both support for student outcomes as well as compliance and stronger focus on training topics to support student outcomes for leadership staff. Finally, special education directors in LEAs that enroll over 5,000 students expressed low levels of agreement regarding the quality of KDE-provided professional development related to student outcomes and compliance for both educators and leaders in comparison to directors at LEAs with smaller student enrollments.

- 10.7.a **Recommendation:** KDE should analyze trends and themes related to special education topics from the Department’s customer service communications to identify areas that are not clear in the available resource documents and training materials.
- Revise current guidance related to special education topics as needed.
- 10.7.b **Recommendation:** KDE should streamline OSEEL’s internal process for developing special education-related public-facing resources to deliver more timely guidance materials to stakeholders. Reduce the number of review and feedback loops by including key internal stakeholders, such as policy advisors and supervisors, in initial drafting of guidance and/or conduct simultaneous reviews by multiple reviewers and share compiled feedback to the author to minimize the time needed from concept to publication.
- 10.7.c **Recommendation:** KDE should identify LEA training needs to improve educational outcomes for special education students and provide professional learning opportunities to enhance LEAs' capacity to meet these students' academic needs.
- Conduct targeted engagement efforts, such as focus groups or listening sessions, with special education stakeholders in LEAs with student enrollment populations larger than 5,000 to gather more information about large district support needs.
 - Use data gathered through targeted engagements to identify continuous improvement areas related to state support systems for LEAs and implement any changes needed to provide such support.

State Advisory Panel for Exceptional Children

- 10.8 **Finding:** The State Advisory Panel for Exceptional Children (SAPEC) does not fulfill its required obligations under the IDEA to advise KDE about the unmet needs of children with disabilities in Kentucky and in the development of statewide policies related to the coordination of services for children with disabilities.

States are required to establish and maintain a special education advisory panel to provide policy guidance. Members of the state advisory panel are required by federal statute to be appointed by a state’s Governor or official authorized to make such appointments under state law.⁴⁰⁴ In Kentucky, this requirement is fulfilled by the State Advisory Panel for Exceptional Children (SAPEC). SAPEC has 21 members that include representatives of different agencies, individuals with disabilities, parents with children who have disabilities, and service providers and administrators. Members of SAPEC are appointed by the Governor and meet quarterly. Public facing documents describing SAPEC membership are unclear as many members have terms which appear to have expired.

According to information published on the OSEEL website SAPEC has five primary purposes:

- Advise KDE about unmet needs concerning the education of children with disabilities in Kentucky
- Review and comment on rules or regulations proposed by the Commonwealth related to the education of children with disabilities
- Advise KDE in the development of evaluations and data reporting to the U.S. Department of Education
- Advise KDE about developing corrective action plans to address findings identified in federal monitoring reports
- Advise KDE in the development and implementation of state policies related to the coordination of services for children with disabilities.⁴⁰⁵

⁴⁰⁴ “20 U.S. Code § 1412 - State eligibility” Cornell Law School, Legal Information Institute.

<https://www.law.cornell.edu/uscode/text/20/1412>; “34 CFR §§ 300.167-300.169 - State advisory panel.” Cornell Law School, Legal Information Institute. <https://www.law.cornell.edu/cfr/text/34/300.167>

⁴⁰⁵ “State Advisory Panel for Exceptional Children.” Kentucky Department of Education. March 25, 2025.

[https://www.education.ky.gov/CommOfEd/adv/Pages/State-Advisory-Panel-on-Exceptional-Children-\(SAPEC\).aspx](https://www.education.ky.gov/CommOfEd/adv/Pages/State-Advisory-Panel-on-Exceptional-Children-(SAPEC).aspx)

OSEEL maintains a website for SAPEC that includes publicly posted meeting agendas, meeting summaries, and video recordings of panel meetings. A review of recent meeting documentation indicates SAPEC has not had a quorum to proceed with scheduled meetings on:

- January 17, 2025
- October 17, 2024
- July 18, 2024

It appears SAPEC has not held a meeting with quorum in almost a full calendar year. The most recent meeting for which public records are available was held April 18, 2024. During that meeting a central challenge discussed was the number of vacant seats on SAPEC. It was noted in the meeting summary that the committee had 12 vacancies at that time.

A SAPEC meeting was scheduled for March 28, 2025, however, no meeting summary or video is available, and it is unclear whether the quorum requirements were met, or whether a meeting was held. A May 16, 2025, meeting date is also posted on the website.

A review of the committee membership roster currently posted on the OSEEL page reflects eight vacancies: four seats for parents of children with disabilities, one seat for a representative of a vocational/transition agency, one seat for a representative from an institution of higher education, one seat for a representative of McKinney-Vento programs, and one seat for a representative of other state agencies. A roster of current committee members is published on the OSEEL webpage for SAPEC. A review of the committee's membership reflects nine seats that indicate a term expiration of June 2024 and five seats with a term expiration of June 2023. It is unclear whether the members whose terms expired in past years continue to serve on the SAPEC based upon the publicly available documents.

The stated purpose of SAPEC, in alignment with federal regulation 34 C.F.R. § 300.169, is to advise KDE regarding unmet needs and statewide policies impacting students with disabilities. A review of past meeting summaries indicates the SAPEC is provided with legislative updates, updates about OSEEL topics such as differentiated monitoring and dispute resolution, as well as public comment. Summaries posted for most SAPEC meetings reflect no feedback on agenda items and no follow-up identified as needed. Given the lack of historic advisory feedback noted, lack of recent meetings, and unclear committee membership, SAPEC is not fulfilling its advisory responsibilities under the IDEA.

- 10.8.a Recommendation: KDE should revise the purpose, structures, and coordination of SAPEC to align with the advisory's regulatory requirements according to 34 C.F.R. § 300.169. SAPEC should advise KDE on the impact of state policies and areas where the needs of students with disabilities are unmet.**
- 10.8.b Recommendation: KDE should implement a transparent tracking mechanism that demonstrates when SAPEC makes policy recommendations to the Department, how such recommendations were reviewed by the Department and by whom, decisions regarding the implementation of such recommendations, and the Department's progress in moving forward SAPEC's recommendations.** When presenting items to SAPEC for feedback and advisory input, KDE staff who are presenting should prepare and include specific questions for discussion and feedback.
- 10.8.c Recommendation: KDE should develop an outreach, recruitment, and training plan to ensure SAPEC vacancies are filled, members are trained to understand roles and responsibilities, and active membership is posted on the Department's website for the public to access.** OSEEL should provide guidance and training to ensure SAPEC members are clear on their roles and responsibilities, including advisory capacities.

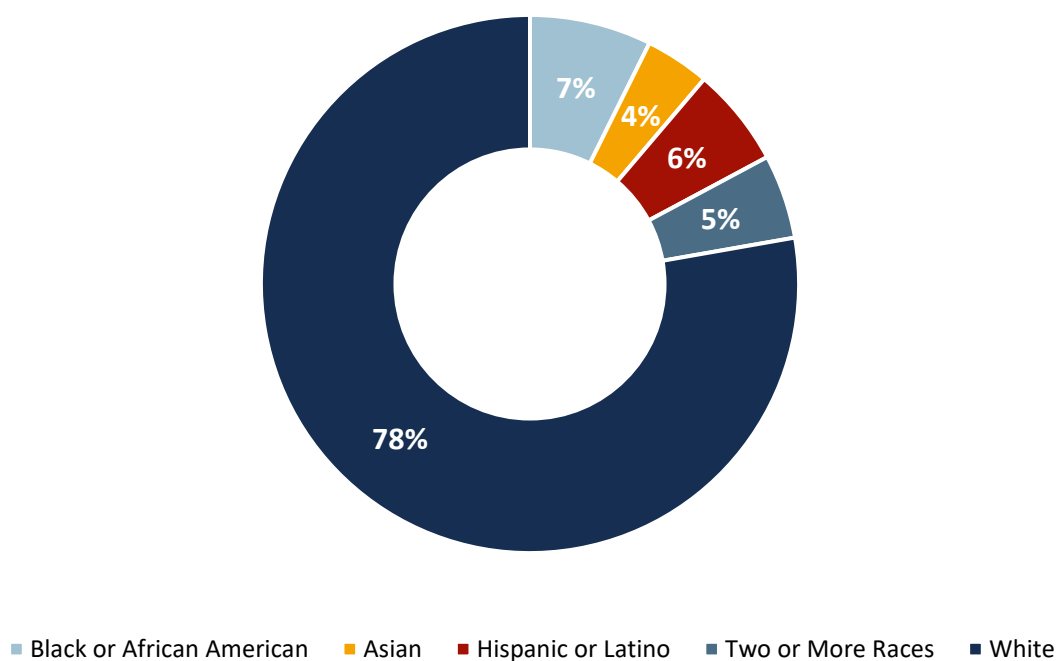
Gifted & Talented

704 KAR 2:285 establishes the regulatory requirement for Kentucky LEAs to establish and provide programs for students who are identified as gifted and talented, including requirements for policies and procedures, appropriate student identification and eligibility determination, provision of services, program evaluation, curriculum, personnel, budget/funding, and procedural safeguards related to gifted and talented programming. KRS 157.200(1)(n) defines a “gifted and talented student” as “a pupil identified as possessing demonstrated or potential ability to perform at an exceptionally high level in general intellectual aptitude, specific academic aptitude, creative or divergent thinking, psychosocial or leadership skills, or in the visual or performing arts.”

Gifted & Talented Students in Kentucky

Kentucky public schools enroll approximately 88,700 students who are identified as gifted and talented, that is, about 14 percent of total state student enrollment. A review of publicly available data published by KDE indicates the percentage of gifted and talented students as a percentage of overall enrollment between 2021-2022 and 2023-2024 has been relatively stable. White students make up 78% of students identified as gifted and talented while Black or African American students represent seven percent of all gifted and talented students. Hispanic or Latino students represent 6%, Asian students represent 4%, and students who are of two or more races represent 5%.⁴⁰⁶ Nationally, about 6.6% of public-school students are identified as gifted and talented. Kentucky presents one of the highest percentages of gifted and talented enrollment in the country.⁴⁰⁷

FIGURE 146: DEMOGRAPHIC COMPOSITION OF GIFTED & TALENTED STUDENTS



Source: Retrieved from the Kentucky School Report Card.

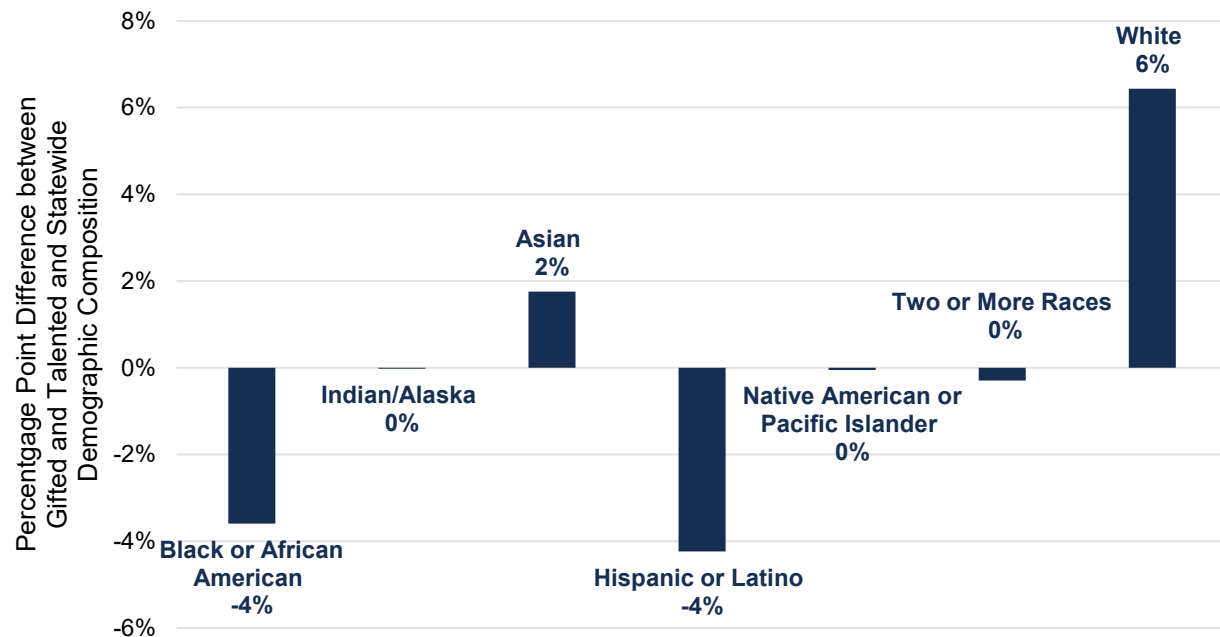
⁴⁰⁶ “Report Card Dashboards: Kentucky.” Kentucky Department of Education. 2024.

<https://reportcard.kyschools.us/kysrc?organization=20232024:999:999000>

⁴⁰⁷ “Percentage of public school students enrolled in gifted and talented programs.” National Center for Education Statistics. 2024. https://nces.ed.gov/programs/digest/d23/tables/dt23_204.90.asp

A comparison of gifted and talent students to overall statewide student demographics reveal disproportionalities. White and Asian students are over-represented in gifted and talented programming by 6% and 2% respectively with consideration to the overall student population. Black or African American and Hispanic or Latino students are under-represented in gifted and talented programs by 4%, while gifted and talented identifications for other sub-populations are in-line with statewide student enrollment for each respective group.

FIGURE 147: DIFFERENCE BETWEEN DEMOGRAPHIC COMPOSITION OF GIFTED & TALENTED & STATEWIDE STUDENT DEMOGRAPHICS



Source: Retrieved from the Kentucky School Report Card.

Gifted & Talented Monitoring & Support

10.9 Finding: The processes for LEA submission and KDE verification of gifted and talented summative evaluation data are insufficient to assess the quality of LEA programming or the effective implementation of program requirements.

LEA gifted and talented programs are monitored annually by OSEEL. This process previously occurred within KDE's Consolidated Monitoring process. However, over the past year, gifted and talented monitoring has occurred as a standalone process. KDE employs one full-time state gifted and talented coordinator and split-funds one managerial position between gifted and talented and special education to support this program area. The gifted and talented coordinator's responsibilities are monitoring LEAs, providing technical assistance and training to LEAs and other stakeholders, and facilitating the State Advisory Council.

Gifted and Talented support at the state level vary considerably across states.

- In Mississippi, gifted and talented supports are housed in the Office of Intervention within Elementary Education and Reading. The state allocates a team of four staff that includes an Intervention Services and Gifted Director who supervises three academic specialist staff. This team is responsible for conducting gifted education program monitoring and supporting LEAs with gifted education programming.⁴⁰⁸

⁴⁰⁸ "Mississippi Department of Education." Mississippi Department of Education. <https://mdek12.org/>

- Alabama houses state support for gifted and talented under the umbrella of special education and requires all LEAs to submit an annual review of their gifted education programming plan for state approval. The state education agency conducts a gifted and talented compliance and continuous improvement review for each LEA every five years. Two education specialist staff are dedicated to supporting gifted and talented programming in Alabama. In addition to monitoring activities, state gifted and talented staff provide technical assistance to LEAs and other stakeholders in response to a technical assistance request form published on the state education agency website.⁴⁰⁹

By the first of March each year, KDE's gifted and talented coordinator reviews the Gifted Education Year-End Report and completes the Gifted Education Risk Tool for every LEA in the state. By the first of June annually, each LEA is required to complete and submit a Summative Evaluation for its gifted and talented program.

This process is completed through a Google Form in which the LEA gifted and talented coordinator self-assesses the district's compliance with KAR 3:285 requirements by answering 26 questions. One of the requirements of KAR 3:285 is the annual submission of the summative assessment itself. Most questions are answered either "yes" or "no." This structure is effective if the item assessed is an essential compliance requirement.

However, several aspects of gifted and talented programming such as differentiated instruction, programmatic continuous improvement, or gifted identification processes do not lend themselves as easily to "yes/no" compliance responses. For these types of program requirements, a more comprehensive rating process is needed to determine the degree and quality of implementation. In addition, some items such as whether the LEA uses forms in the statewide Student Information System, Infinite Campus, or school accountability ratings, should be available to KDE through other means. It is unclear to what degree a LEA's responses are verified or validated to determine whether self-assessed compliance is an accurate reflection of the LEA's practice.

The state gifted and talented coordinator reviews the results of LEA self-assessments and risk assessments. LEAs who self-identify non-compliance and/or LEAs with high-risk scores are identified for follow-up technical assistance with the state coordinator. A Gifted Education Monitoring Report is issued to the LEA upon the completion of technical assistance. The Gifted Education Risk Tool includes factors such as screening and selection procedures, including procedures for screening and selecting students who are members of historically underrepresented subpopulations in gifted education, parental notification of student progress, student services, qualifications of the LEA gifted and talented coordinator, and professional development among other factors. In 2024, 11 LEAs were identified with high-risk scores requiring follow-up.

10.9.a Recommendation: KDE should ensure gifted and talented monitoring includes disproportionate representation. While the gifted and talented risk assessment considers whether a LEA's percentage of students receiving GT services is less than five percent or more than five percent of the overall state average, this metric does not reveal whether a LEA is over- or under-identifying sub-populations of students in-line with district and state enrollment respective to those groups.

10.9.b Recommendation: KDE should limit the number of items in a LEA's gifted and talented self-assessment to only those elements that are not already available to KDE staff through existing data systems including School Accountability, Infinite Campus, and the Student Information System. Where data is available to KDE through existing data systems or collection methods, those data should be extracted and reviewed through those systems.

⁴⁰⁹ "Gifted Education." Alabama State Department of Education. <https://www.alabamaachieves.org/gifted-education/>

10.9.c Recommendation: KDE should establish an integrated gifted and talented summative assessment method through the statewide Student Information System or other online data management platform that allows for pre-filled data fields, extended response mechanisms (such as dropdowns, rubrics, or rating scales), and upload capabilities for documentation.

10.9.d Recommendation: KDE should implement a data validation procedure to verify LEA gifted and talented self-reported data, including randomized sampling of assessment items and review of supporting artifacts, or sampling of LEAs reporting full compliance for follow-up verification.

State Advisory Council for Gifted & Talented

The gifted and talented coordinator leads Kentucky's State Advisory Council for Gifted and Talented Education (SACGTE). The SACTGE, established in KRS 158.648, exists to make recommendations to the commissioner of education, the Kentucky Board of Education, and the Education Professional Standards Board regarding administrative regulations and education policy related to gifted and talented students.

The council consists of 19 voting members appointed by the Governor and three non-voting members. Representation of the committee includes four teachers, four parents, two representatives from higher education, one superintendent, two principals, three LEA gifted and talented coordinators, one local board of education member, one representative of the visual and performing arts, one member from the private business sector, the state consultant for gifted and talented education, and one representative from the Council for Postsecondary Education.⁴¹⁰ There were two vacancies on the SACGTE as of the February 2025 council meeting. Meeting agendas, meeting summaries, and video recordings of SACGTE meetings are posted on the KDE Gifted and Talented web page. A current list of SACGTE members is also publicly available on the KDE website. Discussion summaries and recommendations are documented in the meeting summary for each council meeting.

10.10 Finding: There is no public mechanism to track the outcomes of recommendations from the State Advisory Council for Gifted and Talented Education (SACGTE).

Recommendations are taken back to OSEEL's state gifted and talented coordinator. Council recommendations are reviewed and considered by OSEEL leadership beginning with the Branch Manager and Division Director. KDE leadership determines the degree to which the SACGTE recommendations are subsequently implemented. There does not, however, appear to be a mechanism by which the SACGTE's recommendations are tracked, where and when follow-up occurs, or the outcomes of such recommendations.

At the conclusion of the April 25, 2024 SACGTE meeting, for which a summary is publicly posted, the committee recommended KDE develop an end-of-year report that addresses how each district gathers recommendations about potentially gifted and talented students, how the district identifies students for gifted and talented, how the district utilizes gifted and talented resources, and what questions districts include in surveys to parents. At the same meeting, the committee also recommended that KDE establish a task force to study the allocation of equitable funding for all school districts, review the language of current regulation regarding gifted and talented funding allocations, incentivize teachers to obtain gifted and talented endorsements in response to teacher shortages, evaluate and develop guidelines for appropriate caseload sizes, and require gifted and talented training for general education teachers. Based on publicly available information about the SACGTE's recommendations, the extent to which these recommendations have been implemented is unclear.

10.10.a Recommendation: KDE should implement a transparent tracking mechanism that demonstrates when SACGTE makes policy recommendations to the Department, how such recommendations were reviewed by the Department and by whom, decisions

⁴¹⁰ "The State Advisory Council for Gifted and Talented Education." Kentucky Department of Education. March 19, 2025. <https://www.education.ky.gov/CommOfEd/adv/Pages/Gifted-Advisory-Council.aspx>

regarding the implementation of such recommendations, and the Department's progress in moving forward the SACGTE's policy recommendations.

10.11 Finding: The current use of gifted and talented staffing at 1.5 FTEs is insufficient to serve the identified gifted and talented student population in Kentucky and inadequate for fulfilling the required responsibilities with high quality.

KDE maintains 1.5 FTEs to support statewide gifted and talented strategy, ongoing monitoring, and programmatic support. The Gifted and Talented Coordinator provides external training to LEA gifted and talented staff, ongoing technical assistance through phone calls and emails to stakeholders, gifted and talented data review, monitoring, and follow-up targeted technical assistance to LEAs, as well as coordination and facilitation of the SACGTE. The Guidance and Support Branch Manager is split funded as a 0.5 FTE using gifted and talented funds and 0.5 FTE using IDEA-B funds. The Guidance and Support Branch Manager's duties related to gifted and talented include review of monitoring reports between January and May and quarterly attendance at the SACGTE meetings.

Using data provided by the National Center for Educational Statistics for the 2020-2021 school year and comparison staffing structures for gifted and talented state supports, notable differences exist. Students identified as gifted and talented represented about 13 percent of Kentucky's student enrollment whereas students identified as gifted and talented represented about 6.4 percent and 5.6 percent of overall enrollment in Mississippi and Alabama respectively for the same year. Mississippi employs a staff of four full-time employees to support gifted and talented program monitoring, training, and support while Alabama employs two full time staff for this purpose. Data for Oklahoma during the same time indicates a comparable overall statewide public-school enrollment with about 14 percent of Oklahoma students identified as gifted and talented. Oklahoma employs one full time staff member to support gifted and talented programming in the state.

10.11.a Recommendation: KDE should cross-train the Department's staff that guide and train LEAs, such as OTL, on effective instruction principles for gifted and talented learners to support educator training needs.

10.11.b Recommendation: KDE should reassign the responsibilities of managing the SACGTE from the Gifted and Talented Coordinator to the Guidance and Support Branch Manager.

Operational Study and Analysis of the Alabama Department of Education

FINAL REPORT

March 13, 2020



PUBLIC
CONSULTING GROUP

ESSA COMPONENTS with Considered Addendums by the ALSDE	PRESENT IN ALABAMA'S 2017 PLAN
	<ul style="list-style-type: none"> Implementing systems and practices to prevent bullying and harassment. Developing relationship-building skills to help improve safety through the recognition and prevention of coercion, violence, or abuse. Establishing community partnerships. <p>The SEA reserves 5% for administration and state-level activities. State-level activity funds will be used for the Auburn University Truman-Pierce Institute contract. The state-level activity funds will also be used for salaries and benefits for four Technical Advisors who provide statewide technical assistance to grantees.</p>

School and District Accountability

The ALSDE is responsible for the educational and fiscal oversight of Alabama's schools and districts. There are currently multiple, but not necessarily aligned, accountability systems in place to hold schools and districts accountable for student success. In addition, compliance monitoring occurs to track district compliance of state and federal requirements. Current accountability systems under the ALSDE are inconsistent and frequently described by ALSDE staff as "lacking teeth."

The section reviews four primary accountability systems and actions employed by the ALSDE. These are:

1. The Education Report Card
2. The Alabama Accountability Act
3. Comprehensive Support and Improvement
4. Intervention

Schools with a D or F Report Card Grade and/or on the "Failing Schools" list do not receive targeted or systemic support from the ALSDE.

Education Report Card

The Education Report Card uses data indicators to inform stakeholders of the quality of education students receive in Alabama.

Alabama Act No. 2012-402 requires the State Superintendent of Education to develop a school grading system reflective of school and district performance. This law requires the state to use state-authorized assessments and other key performance indicators that give a total profile of the school or school district, or both. A school's grade, at a minimum shall be based on a combination of Academic Achievement, Academic Growth, Graduation Rate, College and Career Readiness, and Chronic Absenteeism.

Federal requirements under ESSA require a similar accountability system. This Accountability System must include indicators that measure Academic Achievement, Academic Growth, Graduation Rate, Progress in English Language Proficiency, and a measure of school quality or student success. Alabama's approved ESSA plan merges the requirements of both state and federal law into one Accountability System that differentiates among the schools and districts within Alabama.

Analysis of the 2019 Education Report Card identified the following grading trends:

- 64% of schools and districts received an A or B.
- 11% of schools and districts received a D or F, with only 2% receiving an F. All 23 Fs are schools, distributed among elementary, middle and high schools.
- No school district received a grade of F. The school districts of Barbour County, Bessemer City and Tarrant City all received Ds.
- While Barbour County received a district grade of D, all schools in the district received a grade of F.

Exhibit 8. 2019 School District Education Report Card Scores (Total Counts and Distributions)

Grade	Count	Distribution
A	296	20%
B	636	44%
C	372	26%
D	124	9%
F	23	2%

Alabama received a grade of B on the State Report Card. The Alabama State Report Card gives the highest weight to graduation rates at 30%. In our review, only 7 out of all 50 states weighted this indicator as 30% or higher. The next two highest indicator weights are academic achievement (20%) and academic growth (25%). Student outcomes by certain subgroups raised questions about how equity and the opportunity gap is presented on the Report Card.

- Only 28% of Black and 28% of Hispanic students were considered proficient in Reading in 2019.
- Only 28% of Black and 37% of Hispanic students were considered proficient in Math in 2019.
- Only 20% of Black and 26% of Hispanic students were considered proficient in Science in 2019.

It is worth noting that on multiple occasions over the course of this project the Report Card link was broken or inaccessible on the ALSDE website.

Alabama Accountability Act (AAA)

The Alabama Accountability Act (2015-434) identifies “Failing Schools.” “Failing Schools” are the bottom 6% of Alabama public schools annually based on the state’s standardized assessment in reading, English, and math. There are 76 schools on this list each year. 92% of children who attend these schools are Black. There is a school choice option for families who attend these schools. There is no alignment between schools on this list and the Education Report Card.

There is also a provision for Innovation Schools under this law. The goals of Innovation Schools are to allow school systems greater flexibility in meeting the educational needs of a diverse student population and encourage innovation by providing greater control at the local level. Based on the ALSDE website and interviews, it does not appear that any Innovation Plans/Flexibility waivers have been given since 2016.

Comprehensive Support and Improvement

Comprehensive Support and Improvement Schools (CSI) are identified every three years beginning in 2018-19, and are schools that meet any of these criteria:

- **CSI schools:** Title I schools in the bottom 6 percent statewide based on overall summative accountability score (A through F letter grade) or Title I schools with a history of being among the bottom 6 percent statewide, based on overall summative accountability score, for three years
- **CSI high schools:** Any school with a graduation rate more than 10 percentage points below the state average, or with a graduation rate below 67 percent
- **Additional CSI schools:** Title I schools that do not exit additional CSI status after three years
- **CSI-Returning (CSI-R):** Schools that do not exit CSI status after four years

Schools with a D or F Report Card Grade and/or on the “Failing Schools” list do not receive targeted or systemic support from the ALSDE.

The following chart is the total distribution of funds to all school districts that have a school or schools that received CSI dollars in 2019. The Appendix includes a table that displays how CSI designated schools have used those funds. The Appendix also includes a table that displays each CSI school’s academic target attainment on multiple measures.

Exhibit 9. Districts and Total CSI Allocations, 2019

District	Total Allocation
Barbour County	\$123,121.00
Eufaula City	\$260,041.00
Butler County	\$288,167.00
Daleville City	\$212,809.00
Dallas County	\$396,081.52
Gadsden City	\$189,989.00
Greene County	\$164,940.00
Dothan City	\$492,485.00
Bessemer City	\$312,049.00
Birmingham City	\$2,324,445.00
Jefferson County	\$617,729.00
Lawrence County	\$60,499.00
Macon County	\$159,739.00
Huntsville City	\$881,484.00
Mobile County	\$289,760.00
Montgomery County	\$3,848,601.00
Sumter County	\$175,129.00
Tuscaloosa County	\$351,851.00

The Office of School Improvement (OSI) provides on the ground support to CSI schools rather than only taking a compliance role. There are six full-time staff on this team. While support to districts is prioritized because of limited staff, no request is denied, but rather support is differentiated based on need and individual requests. Moreover, the Office also monitors improvement based on the school/district plan.

Currently, there are 61 Comprehensive School Improvement (CSI) schools within the state. The OSI helps schools draft their action plans that address indicators on the School Report Card including chronic absence, student achievement, success of English Learner, graduation rate and career readiness. Training and coaching may focus on: using data; scheduling; standards-based grading; evidence-based strategies; formative assessments; teacher and leader professional learning; classroom observations; student

attendance; school climate; and RTI. In addition, OSI staff provide instructional reviews and facilitate the Transformation Academy.

The Transformation Academy provides summer training to cohorts of CSI schools. In the 2019-2020 school year, Cohort IV will begin training and support. The training consists of four sessions in which the schools develop a 90-day short plan to be implemented over 13 weeks. The focus is to rapidly affect change in targeted aspects of instruction. The long-term goal is to implement a continuous improvement cycle as well as implement permanent structures and routines, leading to sustained growth. The four Academy Sessions are focused on:

- Session 1: Establish Practice-Focused Collaboration
- Session 2: Map the Instructional System
- Session 3: See through the Students' Eyes
- Session 4: Internalize and Innovate

Schools are eligible for a “deeper dive” after the initial training. The annual MEGA Conference hosted by the ALSDE provides more opportunities for schools that attended the Transformation Academy to review practices outlined during the four sessions.

The School Improvement Team noted there are trends surfacing for CSI schools. The CSI School trends are: (1) higher teacher and leader turnover; (2) many uncertified staff and long-term substitutes employed by the school; (3) a high level of rigor not present during instruction; (4) low levels of collective efficacy; (5) high chronic absenteeism; (6) little evidence of RTI or MTSS structures; (7) district leaders assuming multiple roles; (8) needed mental health supports; and (9) low parental involvement. To improve overall outcomes, the Office of School Improvement will have to support schools to address the issues in low performing schools.

When analyzing the school improvement strategies implemented at CSI Schools, it was clear that many schools/districts used their allocation to purchase equipment or hire staff, including administrative staff, at both the school and central office level. Many of the expenditures do not address the trends that are being identified by the OSI team. Expecting low performing districts to adhere to evidence-based practices such as implementing curriculum aligned with ALSDE standards and assessments; establishing strong leadership; using data to set goals and drive instruction for all students; developing and retaining a high-quality staff that can improve instruction; and implementing a plan to establish a positive school culture and climate that embraces high academic expectations should be a priority. Too few of the strategies in school plans are focused on evidence-based practices that will have a significant impact on improving student outcomes.

Intervention

In February 2017, the Alabama State Board of Education voted unanimously to intervene into Montgomery Public Schools (MPS). The State Superintendent has intervening authority that covers the entire district for a five-year period. PCG found District and School qualitative reviews from 2017 on the ALSDE website. These reviews were conducted by an external consultant, Class Measures. At that time, MPS was rated as “inadequate” or “requires improvement” on all measures. There is no other indication of intervention activity after 2017 on the ALSDE or Montgomery Public School’s websites for PCG’s reference. The Montgomery Intervention did not emerge as a discussion topic in interviews or focus groups with ALSDE staff. An August 22, 2018 *Montgomery Advertiser* article provided PCG with a detailed description on all activity related to the intervention through Summer 2018. PCG does understand that the ALSDE worked closely to identify and support a Chief Financial Officer who addressed the significant financial concerns facing the district.

A recent February 7, 2020 article in the *Montgomery Advertiser* indicates the ALSDE may remove MPS from intervention status in the coming months due to recent gains in academic performance, improved finances and new leadership. The 2019 qualitative review from Cognia (formerly Class

Measures/AdvancedED) is anticipated to show improvement from the 2017 review. This release from intervention would be two years early, at the three-year mark.

Alabama's approach to intervention is less prescriptive than in some other states. In Massachusetts, for example, if a district is chronically underperforming, the commissioner appoints a new leader, called a receiver, who is granted the powers of the superintendent and school committee. The receiver reports directly to the commissioner and is held accountable for improving the education in every school in the district for the benefit of all students. The receiver is permitted to make changes in district policies and practices through a required turnaround plan. Prior to a full intervention, Massachusetts uses a tiered approach with varying levels of intervention intensity based on district need. About 15% of all schools in state receive either focused or comprehensive support.

LEA Perception of Accountability and Assistance

PCG interviewed 16 current superintendents serving LEAs across the state. Interviews occurred over seven focus groups. The goal of the interviews was to determine the ALSDE's impact on school district operations and outcomes, the level of satisfaction with ALSDE service among districts, and to identify areas where superintendents believe change is needed to support improved student outcomes within their districts.

To ensure representation from the diversity in school districts throughout the state, PCG used the following criteria to select superintendent focus group participants: (1) superintendents representing all regions throughout Alabama; (2) superintendents from urban, rural, and suburban areas; (3) superintendents who were both elected and appointed; and (4) superintendents new to their role as well as veteran leaders.

During each focus group, superintendents were asked to respond to the same series of questions. Responses were analyzed and then placed into themes for each question. Themes from the data analysis are outlined below.

Experience with the ALSDE

Perceived Strengths

- **Experienced Leadership:**
 - 100% of superintendents in the focus groups stated that Dr. Mackey's leadership at the ALSDE has been positive for district superintendents. Dr. Mackey and his team's understanding of both urban and rural districts has provided supports in areas that have been a struggle.
 - Dr. Mackey's Core Leadership Team (CLT) is experienced and understands district issues, as they have all held the role of superintendent within Alabama.
- **Communication with Core Leadership Team**
 - Dr. Mackey and his CLT are highly responsive to inquiries made by superintendents. 100% of focus groups stated that they had direct access to the CLT members. This personal access ensures questions are answered quickly and accurately.
- **Hands on Support:**
 - Members of the CLT go directly into districts to help resolve issues that need immediate attention. In addition, CLT members or their program leaders will personally address an issue to ensure it is brought to the attention of the Department member who can provide the supports to address the issue immediately.
- **Relationship and Trust Building:**
 - Dr. Mackey has built trust with the district superintendents. He focuses on relationship building, which has not always been the case with other state superintendents in the past.
 - Superintendents' comments included: "it is nice to have confidence in the state leadership," "they will work with you and help you with your district's problems," and that is "the kind of relationship the Department should have with their districts."

Opportunities for Improvement

- **Communication at the ALSDE:**
 - While communication from the core leadership was deemed very helpful, 100% of focus groups stated that communication within the rest of the ALSDE is a challenge.
 - Superintendents noted that there does not appear to be an overall communications strategy by the ALSDE. One focus group member stated, “When you run a State Department of Education, communication should be a key thing.”
 - Multiple weekly memos from the ALSDE are standard. Superintendents stated that there are so many memos that it is difficult to keep up and read them all. The ALSDE many times will “package the memos,” resulting in 20 memos in one package. Some of the memos contain important information while others may be about “Bike Safety Week.” It appears memos are not prioritized based on critical areas to know.
 - There is a lack of consistency from various departments in the information they provide. Different departments provide different answers to the same question. The mixed messages cause confusion within districts.
- **Expertise and Alignment**
 - The ALSDE is perceived to have a difficult time finding the expertise in the field to lead departments. This lack of deep content knowledge inhibits the ALSDE’s credibility with districts.
- **PowerSchool Rollout**
 - While there are PowerSchool trainings scheduled, there is a fear that there will be glitches when districts transition from Chalkable. More training and support for districts are needed to ensure all LEAs are ready for the change.

Interaction with the ALSDE

Perceived Strengths

- **Support on Compliance Issues**
 - Superintendents interact with the ALSDE on compliance issues more than anything else. They believe their district receives the necessary supports to ensure they are being compliant with state and federal laws.

Opportunities for Improvement

- **ALSDE Directory**
 - Superintendents expressed frustration regarding who they or members of their staff should call at the Department to have their questions answered. Many directly call Dr. Mackey or the Core Leadership Team (CLT) to point them in the right direction. Having a clear directory that is updated regularly would be helpful. With staffing changes at the ALSDE, many Superintendents do not know who is there and which department they lead.
- **Regional Meeting Locations**
 - Alabama is a geographically large state and asking superintendents and their staff to drive 5-6 hours each way for a meeting in Montgomery is not always possible. Moving statewide meetings to different regions throughout the school year would be more equitable for districts located the furthest away.

Supports from the ALSDE

Perceived Strengths

- **Task Force Convenings**
 - The ALSDE has placed a greater emphasis on getting more input from superintendents throughout the state. There has been a strong direction from Dr. Mackey on convening

task forces to provide superintendent voices at the table. Recent Task Forces include: Teacher Evaluation, Teacher Shortage, and Assessment. The Department has been putting together groups to get the perspective from school systems. This is the first time that has occurred, and their inclusion is much appreciated by superintendents.

Opportunities for Improvement

- **Regional In-Service Centers**
 - The quality of regional centers varies across the state. Many superintendents stated they do not use their Regional In-Service Centers (RICs) for professional development because the offerings do not align to their local needs.
 - The creation of professional development from the RICs is not consistently aligned to ALSDE or LEA priorities. In many instances, LEAs have experienced very limited communication from the RICs regarding their districts' professional learning needs. Typically, they receive a menu of professional learning options that do not align to their district goals. As a result, districts often provide training either internally or through an outside vendor.
 - Superintendents from smaller, more rural districts who do not have the resources to pay outside vendors reported using the Regional In-Service Center resources more frequently and found value in the RICs services.

Recognition

Perceived Strengths

- **Multiple Opportunities**
 - The ALSDE provides multiple opportunities to recognize teachers and districts. Some of the recognition opportunities came directly from the ALSDE while others came from other professional organizations.

Opportunities for Improvement

- **Provide Better Communication**
 - There was a significant gap in superintendents' knowledge of recognition and awards. Some had extensive information while others had no idea what was available and how to get involved. Providing more structured communication through the ALSDE and other professional organizations will help districts that would like more involvement.

Change Recommendations from Superintendents

Opportunities for Improvement

- **Consistency**
 - The ALSDE needs to be more consistent in their messaging as well as in their approach to district supports. Superintendents become frustrated when there are different answers from various Department staff, when the ALSDE changes state assessments and LEAs struggle to keep up, and when staff turnover affects the consistency of program implementation.
- **Preparedness**
 - Superintendents stated that the ALSDE frequently rolls out new initiatives before they are fully conceptualized. Superintendents reported they often felt a lack of clarity on how to communicate the purpose and messaging of new statewide initiatives to their district.
- **Focus**
 - There needs to be more focused support targeted to the areas of literacy and numeracy. It should be intentional and provide resources and support for all districts.

- **Alabama Reading Initiative (ARI) and Alabama Math Science Technology Initiative (AMSTI)**
 - Both programs were heralded by superintendents as difference makers when they began their implementation. However, due to the lack of funding and the inability to service districts as they did before the budget cuts, superintendents are frustrated and would like to see additional supports and resources coming from both groups. The poor NAEP math scores and the Alabama Literacy Law are pressing on the districts to improve student outcomes and they need changes in service delivery and supports to make that happen.

Additional Needs

The following areas were shared as critical district needs that would help improve educational services.

- **Mental Health Services.** There are challenges throughout districts addressing the mental health issues of the youth attending school. Districts cannot fully support students the way they need to without additional resources.
- **Guidance Counselors, Social Workers and School Nurses.** In order to support mental health issues, there need to be school-based staff who focus on prevention and support. Including more of these types of professionals within districts and schools will prevent some of the escalation of student issues that are being addressed in schools throughout the state.
- **Professional Development.** Professional development is perceived as reactionary to new legislation.
- **English Learner (EL) Supports.** The EL population is growing in many districts and there is a need for more ALSDE guidance.
- **Special Education Resources.** Districts are struggling with the increasing numbers and complexity of needs of students receiving special education services. Districts want more technical assistance, additional resources and funding to better serve this population.
- **Certified Teachers.** Superintendents need help recruiting teachers. They reported struggling to fill positions with high quality, certified staff.
- **Pre-K Alignment.** LEAs state a lack of alignment between Pre-K expectations from the Department of Early Childhood Education and guidance from the ALSDE.

Educator Quality

Educator Recruitment and Retention

The Alabama Teacher Shortage Task Force convened in 2019 to develop a comprehensive approach to ensuring every classroom has an excellent, highly qualified teacher. The group met seven times over a six-month period. The Teacher Shortage Task Force Report was published in September 2019. Key findings included:

- 30% of all classrooms are being taught by teachers teaching out of field, having neither a major nor a minor in the field.
- Since 2010, there has been a 40% decrease in students entering teacher education programs.
- 8% of teachers leave the profession each year.
- Only 523 secondary first time teaching certificates were issued in Alabama during the 2017-18 school year.

The report includes 33 recommendations—23 for recruiting teachers and 10 for retaining them. As of January 2020, the ALSDE was still working on a comprehensive plan for implementing these recommendations.

There is a new MOU with [Teachers of Tomorrow](#) to explore alternative certification opportunities. As of January 2020, no school districts have elected to form a partnership with them.

VII. Priority Recommendations

PCG saw ample evidence that the ALSDE has a foundation on which to build. As noted throughout this report, the Agency has many notable strengths including its willingness to participate in this review as part of a continuous improvement cycle.

However, without a sense of urgency and an unrelenting commitment to implementing the recommendations in this report with fidelity, the ALSDE will stagnate. Enacting change, the kind of change that will fundamentally improve outcomes of all students, requires focus, a strong vision from the State Superintendent and enacted by senior leadership staff, an appropriate allocation of resources, mandated professional learning, and clear, non-negotiable, accountability measures. This type of reform requires the involvement and commitment of every staff person and a willingness to establish high expectations for districts, schools and students.

The following are PCG's key, non-negotiable recommendations. Without faithful implementation of these five recommendations, all other organizational recommendations will have limited to no impact.

1. Take the Lead.

The ALSDE must take full ownership and accountability for student progress across Alabama. The ALSDE is responsible for both academic and social/emotional success of students, with the end goal of ensuring all graduates are prepared for life after high school. The ALSDE must establish their proper role as the state educational authority in Alabama and perform accordingly.

The ALSDE leadership must be bold but also collaborative. There are times when the ALSDE must take charge and bear full responsibility for aspects of reform, and other places where the ALSDE must set the conditions for others to assume leadership. Like an expert conductor, the ALSDE may not have the expertise to play all the instruments but through a combination of the use of outside experts, significantly involving the people in schools and districts that do the hardest work, and partnering with as many involved groups as possible, the Department can and should be able to move the State of Alabama forward in significant ways.

2. Develop and Implement a Strategy to Action Plan.

The ALSDE tends to be reactive primarily because it does not have a clear plan of action, leading to inconsistent decision-making. Decisions are in response to external pressure and appear to be quick fixes without regard to long term ramifications or connections to other initiatives within the Department or the State.

The ALSDE must develop a comprehensive, detailed and transparent *Strategy to Action Plan* with defined steps and activities, financial implications, milestones, deadlines and results. This *Strategy to Action Plan* should guide the implementation of all recommendations in this report. As a first step, the ALSDE will need to inventory and consolidate all existing plans to ensure all staff are working towards the same goals. To ensure transparency and partnership, the ALSDE must institute routine and public progress updates. An iterative Strategic Communications Plan should be developed and implemented to communicate the *Strategy to Action Plan*. Regular progress updates should be provided to the Alabama State Legislature, the State Board of Education, Superintendents and all of Alabama's citizens.

3. Focus First on the Priorities.

There is much to address but beginning with a few, clear critical initiatives is the only way to galvanize the State to move in the right direction. The *Strategy to Action Plan* must drive this prioritization.

STANDARDS: For the next year, the core focus must be on the adoption of the Reading and Math Course of Study at the local level. If teachers understand these standards and align their instruction to them, student achievement will improve. The ALSDE must implement a detailed Communications, Professional Learning, and Technical Assistance Plan to support standards adoption. Equally, state testing should be used as an improvement tool to ensure instruction is aligned to the standards. The ALSDE needs to begin immediately to prepare to analyze the results of the new state tests and provide critical data to schools and districts. The ALSDE must ensure local educators have detailed data to examine test results and to connect the test items to the standards. The release of test items will also be an important tool for local educators. The ALSDE should also look for ways to disseminate classroom teaching practices that are working across the state to get results.

STUDENT INFORMATION SYSTEM: The pending PowerSchool implementation has the potential to substantially impact how schools and districts function. For the first time, all systems, schools and teachers across Alabama will have access to the same learning management, student information, reporting and analytics tools. The scale of this initiative is huge. An equal and prioritized focus must be placed on this roll-out to ensure implementation success.

4. Hold Schools and Districts Accountable.

Student performance and compliance with state and federal requirements is the responsibility of local schools and districts. The ALSDE must hold all schools and districts accountable for their performance in an actionable way. Current accountability structures do not incite needed urgency at the local level. For example, only 38% of all students and 20% of Black students statewide were considered proficient in Science by Alabama measures in 2019, yet the state received a letter grade of B on the State Report Card. Accountability and assistance must be closely linked to produce continuous and sustainable improvement. Strengthen the ALSDE's ability to provide targeted, coordinated and deep technical assistance for schools and districts that have demonstrated the inability to do it on their own.

5. Significantly Reorganize the ALSDE Internally.

Substantial structural changes must occur at the ALSDE to implement the recommendations in this report. The organizational structure should align with the *Strategy to Action Plan* and the core function of every program must be to improve student outcomes. All staff employed by the ALSDE should have the core skills and competencies needed to do their job well. There needs to be a significant focus on the professionalization of staff, including a deep investment in staff training. The current hiring process also needs to be revisited in collaboration with the State Personnel Office. Outdated internal systems and paper-based practices are unnecessarily time-consuming and limit productivity. Streamlining procedures and moving to electronic systems across the ALSDE has the potential to significantly improve outputs.

VIII. Additional Recommendations

Standards, Accountability, and Assistance

1. **Accountability.** Accountability and assistance must be closely linked to produce continuous and sustainable improvement.
 - a. Modernize data and analytics systems, improve analytic capabilities, and place data at the center of all policy discussions in public education.
 - b. The Accountability unit primarily functions as an internal data analytics shop. Broaden the role of accountability to focus on policy, research, and district guidance to drive the school improvement conversation.
 - c. There is a wealth of data used to produce School Report Cards. Develop data reports, policy briefs and analytics tools that can support local decision-making. These should be publicly available.
2. **Report Card.** The current School and District Report Card Develop should be refined to improve stakeholder clarity and ensure accurate understanding.
 - a. Be more explicit about the formula that is used to calculate a school or district's letter grade on the Record Card.
 - b. Review state-level formula inputs to reconsider if state letter grade should be a "B." If deemed appropriate, Report Card should more clearly justify how this letter grade was determined.
 - c. Use icons such as arrows to demonstrate upward or downward growth.
 - d. Provide comparative data to allow for end users to understand how a school or district performs against other districts and the state overall.
 - e. Develop user guides and videos to orient stakeholders to better understand how letter grades are calculated and how to interpret data shared.
 - f. Determine if there is the ability to suppress certain data fields that are not relevant to certain grade spans (i.e., graduation rates at the elementary level). The inclusion of the term "no data" can be misleading to some end users.
 - g. Consider how assigned letter grades align to other accountability systems.
3. **Education Funding.** Alabama's education funding model does not differentiate based on student need or poverty level.
 - a. Review impact of adopting a weighted student-based funding model (foundation formula model) to align to national best practice.
4. **Graduation Rates.** The current graduation rate in Alabama is 90%, yet a quarter of all students must take remedial courses in Alabama's colleges. Given NAEP scores and remedial course taking rates, determine if requirements for graduation are too low.
5. **School Improvement.** Strengthen the scope and capacity of this team to better drive school improvement.
 - a. The CSI team charged with providing the support is small and under resourced. Most NAEP states reviewed have a cadre of staff to support this function. In addition, these states augment with outside partners who have expertise, experience and success working with low performing schools, both in rural and urban areas.
 - b. Create incentives to ensure schools and districts use their resources to improve student outcomes rather than fill in budget gaps within the districts.
6. **Innovation.** Create an Innovation Unit to allow districts and schools flexibility to implement practices that best support their community and incubate new ideas. Increased accountability measured by student outcomes must be a non-negotiable component of granting increased flexibility.
7. **Compliance Monitoring.** Monitoring is solely focused on compliance indicators. Determine if there are opportunities to augment monitoring elements to emphasize results/student outcomes.

- a. The ALSDE uses a risk score to determine onsite monitoring each year. Consider how districts that are frequently identified as high risk would benefit from more intensive or mandated technical assistance from compliance monitoring or other program staff.
- b. Compliance reports (outside of special education) are not currently posted online. Not sharing this data inhibits accountability and transparency. This is particularly true for Correction Action Plans (CAPs).
- c. PowerSchool may help to streamline the monitoring process.

Governance

8. **State Board of Education.** Facilitate annual board retreats and other board trainings to set board expectations, priorities and roles. The Chief of Staff should serve as the first point of contact for board inquiries and questions.
9. **State Leadership.** Strengthen two-way communication with the State legislature. Communication should be frequent, meaningful and led by the State Superintendent.
10. **Strategic Plan.** Finalize and disseminate the draft Strategic Plan as a *Strategy to Action Plan*.
 - a. Be explicit on strategic actions
 - b. Set metrics and track progress towards goals
 - c. Provide regular public updates on plan progress

Internal Functions

11. **Reorganization of the ALSDE.** Implement the significant organizational changes outlined earlier in this report to better align the ALSDE to its core functions. These include:
 - a. Expand Chief of Staff role to 1.0 FTE (currently at 0.5).
 - b. Expand current Communications Director role to encompass board communications, legislative affairs and oversight of a Problem Resolution unit.
 - c. Legal: Move legislative affairs out of this team.
 - d. Dissolve the current Professional Learning Team. Move these duties to other sections.
 - e. Create a true Data Analysis, Strategy, and Internal Audit Division to inform policy and practice and ensure the ALSDE's efficacy of practice.
 - f. Reconfigure Division of Instruction to align to core functions: 1) Implementation of Educational Standards; 2) LEA Accountability and Assistance; 3) Educator Quality and 4) Prepared Graduates.
 - g. Create a District Accountability and Assistance unit that has significantly more reach and responsibility than the current School Improvement Team.
 - h. Expand the role of Teaching and Leading to include all aspects of Educator Quality.
12. **Personnel.** In close collaboration with the State Personnel Office, relax personnel requirements for a 24-month period to allow the ALSDE to have the most effective staff in place to support the implementation and delivery of all recommendations in this report. Monitor activity closely to ensure appropriate staffing decisions.
13. **Regional or Satellite Offices.** Many programs are heavily field-based and staff waste significant time on travel. Regional satellite centers may support efficiency and increase the pool of quality job candidates. Conduct a cost analysis study to determine the long-term feasibility of a regional model.
14. **Current Facilities.** The current space in the Gordon Persons building is not conducive to a collaborative or productive working environment. Staff are siloed, spread across multiple floors with another Agency wedged between, and the layout is confusing and not welcoming to visitors. Develop a plan to move to a facility that better supports the core functions of the ALSDE. Consider how a building move might be coupled with a regional office approach.
15. **Human Resources.** Realign the work of Human Resources to make its core focus the professionalization and development of staff. Consider if some existing job functions could be transferred to the Payroll Office to better support this repositioning of responsibilities. Duties at a minimum should include:

- a. Onboarding Program for Staff
 - b. Professional Learning Program, differentiated by staff role, experience and learning needs
 - c. Performance Monitoring and Employee Growth
 - d. Technology Training
 - e. Written documentation on staff expectations, job descriptions, human resources policies and procedures.
- 16. Job Ladders.** Determine if there is opportunity for internal professional growth and advancement through greater stratification in job titles.
- a. Enhance opportunities for clerical staff that excel at the ASA III level
 - b. Differentiate roles at the Education Specialist level to include at least an Education Specialist II position
- 17. Legal Services.** Develop systems to ensure better tracking of activities to allow for consistent practices and more informed decision-making.
- a. Procure a Case Management System to create a shared database that allows for document sharing, better record keeping, time tracking and trend analysis.
 - b. Log calls received and resolution from school districts, families and other stakeholders. Conduct regular analysis of issues received by type, district and outcome to determine areas where Agency guidance, policies or other proactive measures might lessen or eliminate concerns.
 - c. Review Board of Adjustment claim activity over the past 24 months, including frequency of low dollar claims, to determine if policy changes should be made to current practices.
 - d. Analyze type and frequency of legal support provided directly to school districts to determine if many of these activities should be local obligations. Develop written guidance around when legal services should be provided at the state level versus district managed.
- 18. Information Technology.** Continue to set the expectation that the role of IT is to function as an internal Fee for Service unit for the ALSDE programs. Program staff must own all business requirements development, system design, and final approval of all IT development activities.
- a. Several IT solutions are developed and hosted internally. Before new design updates occur, consider if existing technologies can be procured that fit system requirements. For example, the Child Nutrition application needs to be rewritten. Consider off-the-shelf solutions through an RFI process prior to developing in house.
 - b. Analyze purchasing trends over the past 24 months to determine if a P-Card would expedite purchasing turnaround time on low dollar items.
 - c. The IT department reported challenges in recruiting qualified staff under current State Personnel practices. As such, several employees are in long-term contract positions. Consider if current hiring procedures should be revised to better attract more qualified candidates to these positions.
 - d. Adopt Agency-wide internal document sharing practices to allow for better collaboration amongst staff and with school districts. For example, use of Microsoft SharePoint, Teams and OneDrive would greatly increase collaborative work habits.
 - e. Agency staff would benefit from additional training in Microsoft Office Applications and other technology use. Target ASA and Education Specialist staff first. This function should be an HR responsibility with IT input.
- 19. Written Procedures.** There is an absence of written policies, procedures, manuals and guidance used to drive internal work. Ensure procedures have written documentation that is consistent across programs (where relevant) and is regularly updated. This should be housed in an electronic format in a location that is readily accessible to all staff.
- 20. Emergency Management.** Practice safety drills with an emergency management internal team. While the ALSDE is focused on upgrading security and ensuring safety drills are being held in schools and districts around the state, the ALSDE has been remiss with that same focus with their own building and staff.

- 21. Purchasing/Procurement Process.** Streamline the purchasing/procurement process to reduce the number of steps and signatures.
- The ALSDE is working on a technology requisition system with a targeted completion date of summer 2020. Confirm this system will increase timeliness and ease of procurement process.
- 22. Memo Routing Processes.** Streamline the routing processes for memos, letters and contracts to improve internal efficiencies and communication with school districts.
- Convert paper-based memo writing process to an electronic format. Electronic routing will allow for better standardization, internal tracking for timeliness, and reduce the risk of lost or misplaced documentation.
 - Reduce the number of required signatures to only those whose review is critical.
 - Develop a Style Guide and Memo Template so that all staff are aware of memo writing formatting expectations.
 - Provide training to all new staff on memo writing processes to ensure consistent practices.
- 23. Child Nutrition Program.** Conduct an in-depth review of the current structures and function of this program to ensure efficacy, compliance and aligned practices. The Child Nutrition Program currently oversees several programs that are provided elsewhere in other states.
- Consider moving all non-school based nutrition programs to the Department of Agriculture or other suitable agency. This would likely include: Commodity Supplemental Food Program, Emergency Food Assistance Program, and the Child and Adult Care Program.
 - Review internal operations that adhere to federal regulations. Many recent audit findings, while easily correctable, are due to a lack of oversight within the section.
 - Consider reviewing the expectations of the staff and section leadership. The Child Nutrition Program currently oversees a staff of 37+ and oversees more than 11 programs without an administrator assigned to lead the section. Making changes to roles and responsibilities within the section may ensure more oversight leading to less audit findings.
 - Ensure a customer service orientation to all aspects of Child Nutrition program delivery.

Communications

- 24. Complaint and Inquiry Management.** There is not a centralized location for families and other stakeholders to call when there are a potential concerns or questions. In its absence, multiple individuals are answering calls that are outside of their core work, callers are often bounced around or receive misinformation, and there is no centralized knowledge of the types of calls received.
- Create a unit to receive inquiries and complaints from families and other stakeholders to streamline process for callers. This unit should set up systems to ensure appropriate logging of calls, consistency of communication, and ensure problem resolution.
 - Elevate calls to appropriate individuals in other units as needed.
 - Conduct trend analysis to identify greatest areas of concern for callers.
- 25. External Communications to All Stakeholders.** Create a Strategic Communications Plan that ensures consistent, frequent and targeted messaging to all constituents. The Strategic Communications Plan should be regularly revisited and updated to reflect current messaging needs. At a minimum this Communication Plan should include:
- An updated, website that is friendly to all end users.
 - Include a plan for how the website will be maintained and frequently updated.
 - New website should be mobile-friendly and meet accessibility standards.
 - Develop content guidelines to ensure all information on website serves a purpose, is informative, and accurate
 - The new website is in development with a target roll out date of July 2020. Track progress to ensure an on-time launch.
 - A social media strategy to target messages around key reform initiatives to engage stakeholders, educate and build community.

- i. See Tennessee's #TNBestforALL campaign as an example.
 - c. A media relations strategy to ensure calculated deployment of media to tell the ALSDE's story.
 - d. Identification of metrics and tracking of these metrics to determine awareness, engagement and consumers. Web-based applications such Google Analytics to track website traffic and Hootsuite for social media management can support metric analysis.
 - e. Update logo and Style Guide to communicate a more contemporary, energized message to stakeholders.
 - f. Presentation (i.e., PowerPoint) and report templates to ensure consistent and professional materials are used.
 - g. Targeted communications plans should be developed for all key and new initiatives, and should including branding, identification of target audiences, messaging and metrics. These should be mutually owned by the Communications Department and the respective program area.
- 26. Communications to Districts.** Current written communications to Superintendents and other school district leaders comes in the form of disparate memos. Develop a streamlined newsletter that can be used to communicate overall messaging and strategy, along with formal guidance.

Educator Workforce

- 27. Teacher Certification Process.** Significant changes must be made to the current teacher certification and recertification process to remove inefficient processes, redundancies and opportunities for human error. Improvements should also reduce the reliance on paper-based processes. The LeanFrog Report was comprehensive, and recommendations are aligned to PCG's findings.
- a. Release an RFI to determine if a vendor solution may meet the ALSDE needs prior to implementing a web-based solution in house.
- 28. Educator Effectiveness.** Finalize and implement the new Teacher Evaluation System. Develop a detailed implementation plan that includes a comprehensive Communications Strategy and Professional Learning Approach so that all teachers understand new expectations prior to roll-out.
- 29. National Board-Certified Teachers (NBCT).** Review effectiveness of National Board-Certified Teacher pay supplemental to determine if program has intended outcomes. Revise policy as necessary depending on data review. At a minimum, analyze:
- a. Achievement outcomes for students taught by an Alabama NBCT versus others.
 - b. % of those receiving the NBCT pay supplemental who are current classroom teachers versus in those other positions.
 - c. Efficacy of the additional \$5,000 supplement for NBCT teachers in identified struggling schools.
 - d. Distribution of NBCT teachers across the state by school demographics.
- 30. Teacher Recruitment and Retention.** Prioritize and implement the 33 recommendations from the Teacher Taskforce Report.
- a. Develop an implementation roadmap to develop a multi-year plan and ensure accountability to timelines.
 - b. Determine if there is the opportunity to implement a statewide alternative certification and consider other outside of the box approaches to teacher retention.

Disability Determination Services

- 31. Disability Determination Services (DDS).** DDS processes claims for Social Security and Supplemental Security Income disability claims. It does not perform a direct K-12 educational function. Given this and the below data, PCG recommends moving DDS to another Agency outside of the ALSDE.

- a. DDS is an outlier to the ALSDE. The section provides different services than any other section but uses many ALSDE resources. The resources include:
 - i. Finance- Reports and is supervised by CFO. Receives services from the SDE Business and Support Services
 - ii. Human Resources- Manages all aspects of 406 employees (almost the size of the rest of the ALSDE). Hires from 8 different registers.
 - iii. Legal- Reviews all contracts, which may be 50+ in a month
 - iv. Accounting
 - v. Procurement- Ordering goes through the ALSDE procurement process
 - vi. IT Department
- b. The ALSDE staff report the unit to be high functioning and well-managed, with indirect costs covering all operational expenses. However, the DDS Director has served in the Department for 45 years and PCG's assumption is retirement will be forthcoming. It is highly likely that shifting to new leadership will put a strain on the ALSDE and initially impact services.
- c. In analyzing NAEP states, the DDS programs are not located under the State Departments of Education with the exception of NH, which has it under Vocational Rehabilitation Services at the DOE. The list of states are as follows:
 - i. Florida- Department of Health
 - ii. Mississippi- Department of Rehabilitation Services
 - iii. Massachusetts- Office on Disability
 - iv. Tennessee- Department of Human Services' Division of Rehabilitation Services
 - v. NH- Department of Education- Voc Rehab Services
 - vi. Wyoming- Department of Health
 - vii. New Jersey- Department of Human Services
 - viii. Minnesota- Department of Human Services
- d. Uncoupling a department that has been with the ALSDE for 50+ years will be complicated and may take legislative involvement. However, making changes that align with other successful NAEP states will ensure that all services being provided are focused on education, which must become the priority.

Coordination with Other Agencies

- 32. Department of Early Childhood Education (DECE):** The work of DECE directly impacts a student's learning trajectory.
 - a. Strengthen communication with the DECE's Office of School Readiness to ensure for greater policy alignment and more streamlined experiences for families and schools specifically as it relates to Pre-K and the PK-3 Early Learning Continuum.
 - b. Ensure coordination between Early Invention and Special Education to better support families of children who qualify for these services.
 - c. Develop intentional partnership strategies with DECE to promote overall school readiness.
- 33. Department of Mental Health.** Expand to school-based mental health collaboration to increase access to mental health professionals across the state.
- 34. Alabama Commission on Higher Education.**
 - a. Strengthen partnership to increase student access to and participate in dual enrollment opportunities.
 - b. Increase data sharing to allow for better tracking of students' post-secondary outcomes.

Improved Instruction and Supports to Districts

- 35. Career Readiness and Workforce Readiness.**

- a. Leverage external initiatives to expand current focus. The Governor's "Strong Start, Strong Finish" initiative prioritizes the education to workforce pipeline. Perkins V requires intensified focus on academic standards and alignment to workforce development.
- b. Calling the unit "CTE" limits the vast scope of workforce preparation activities this office can and should perform.
- c. The CTE Director role is currently vacant. This provides an opportunity to broaden role to greater encompass "college, career, and life" readiness.
- d. Develop a P-20W statewide longitudinal data system to support tracking of post-secondary outcomes.
- e. Develop a statewide system for K-12 career exploration and planning.
- f. Require individual career plans for all students in grades 6-12.
- g. The Graduation Tracking System serves as an early warning tool to identify students off-track to graduate at the local level. It is unclear to PCG how and if this is still used.
- h. Deploy CTE pathway-aligned models of work-based learning and dual enrollment.
- i. Credentials tracked for the CCR Accountability metric should be aligned to regional labor market data and tied to high-growth, high-demand, and high-wage sectors.
- j. Partner with the Alabama Office of Apprenticeship to increase work-based learning opportunities for students.

36. Multi-Tiered Systems of Support (MTSS). An MTSS Taskforce formed this year to begin to develop state guidance on an MTSS framework. MTSS is a decision-making framework that enables schools to proactively identify student's strengths and needs based on data and use of evidence-based practices. MTSS address both academics and student's social-emotional needs. MTSS should be a core component to how school districts build the necessary supports to ensure the success of all students.

- a. Develop written guidance for districts to understand the philosophy, model and required components.
- b. Design a professional development strategy that ensures training is provided to all districts.
- c. Given the complexity of this work, consider engaging with a national expert to facilitate framework design and implementation strategy.

37. Mathematics

- a. Aggressively disseminate the new Math standards across the State. Since they represent what Alabama students should know and be able to do in Mathematics at the various grade levels, the most important audience are teachers, local administrators, and parents. Less detailed documents need to be shared across the State with families, community members and other stakeholders.
- b. Lead the initiative of unpacking the new math standards and use all resources available to train coaches and teachers to implement the standards with fidelity. With the support of regional centers, all schools throughout the state should have access to the support it needs to adhere to the more rigorous standards. Data should lead this roll out process with the districts serving the bottom 6% of schools receiving priority.
- c. Track AMSTI impact on teacher practice. Create systems for data collection using multiple measures outlined below to monitor progress throughout the implementation. Link multiple data sources and monitoring progress toward measurable goals.
 - i. Define the strategies needed to achieve the ALSDE's vision of improved student achievement in mathematics as well as measure whether the instructional strategies are effective.
 - ii. Ensure strategies are in place to ensure long-term, sustainable results
 - iii. Identify the current performance for both teacher effectiveness and student achievement against the measures (baseline data) and the target performance desired at predetermined points.
 - iv. Recognize when strategic shifts are needed to accomplish the ALSDE goals without a big lapse in time.

- d. Break down the silo between AMSTI and Instructional Services. While one of the Instructional Services tasks is to develop Courses of Study (standards), there appears to be a lack of communication and collaboration between members of each team.
 - i. Schedule consistent time set aside for the math and science education specialists to collaborate and plan to provide supports to the LEAs.
- 38. Gifted Education.** Gifted Education only has one staff member. As a result, the predominant focus is on compliance.
 - a. Prioritize the hiring on current vacancy to allow for a greater focus on technical assistance and professional learning.
 - b. Determine if this role should remain housed within special education or stand on its own.
 - c. Gifted Education is not on the Cognia system for Compliance monitoring. For a lack of another system, monitoring data reports are currently shared via email. Move to a more secure data/document sharing platform.
- 39. English Language Learners.** The number of English Language Learners in Alabama is growing. Current services are disjointed and spread among multiple sections. Hire a statewide ELL administrator to develop a strategic approach to support this population.
- 40. Special Education.** Consider how all activities of this section work to help school districts raise the level of and access to high levels of rigor as well as generate a culture of academic optimism for students with IEPs.
 - a. Under the revised Results-Driven Accountability (RDA) framework, the federal Office of Special Education Programs (OSEP) has sharpened its focus on what happens in the classroom to promote educational benefits and improve outcomes and results for students with disabilities. The accountability system that existed prior to the new one placed substantial emphasis on procedural compliance, but it often did not consider how requirements affected the learning outcomes of students.²⁵ RDA offers a strategic opportunity for Special Education to shift programmatic emphasis and monitoring towards a greater emphasis on outcomes.
 - b. Monitor state IEP system in PowerSchool to ensure it supports reporting and monitoring needs.
- 41. Regional In-Service Centers (RICs).** Conduct a feasibility study to determine if the functions of the RICs can and should be moved in-house to the ALSDE. In the interim, do the following:
 - a. Expect all Regional In-Service Centers to align to the 2019 Accountability Standards. They should be posted on every website and RICs should be held accountable to meeting them.
 - b. Set minimum expectations for all websites. There should be an easily accessible and updated monthly professional development calendar. Expecting educators to spend time searching for professional learning on a RIC website will not encourage them to sign up for learning that they need to support student achievement.
 - c. Provide more focus on supporting training for ALSDE's initiatives. It is difficult for educators to travel hours to attend a training in Montgomery. The advantage of RICs is that all Alabama educators have the same opportunity to receive high-quality professional learning no matter where they are located. With the Alabama Literacy Act in effect, teachers need as much support as possible to achieve the lofty goal of all students reading on grade level by the end of third grade. Every Regional Center should be contributing to this effort.
 - d. Build a stronger collaboration with the ALSDE. The oversight and accountability of the RICs is difficult to understand. Many are unclear as to "who is in charge." Set the expectations for all Regional In-Service Centers and how will those expectations be measured.
- 42. Whole Child Wellness/Prevention and Support Services**

²⁵ April 5, 2012, RDA Summary, U.S. Department of Education. www2.ed.gov/about/offices/list/osep/rdasummary.doc

- a. Create mission and vision for a comprehensive approach to whole child wellness and align resources and services to that mission.
 - b. Develop stronger communication and collaboration between Prevention and Support and other sections such as special education and instructional services.
- 43. MEGA Conference.** The MEGA Conference provides many different educator groups with an opportunity to gather, connect, and learn. While the sessions are large in number, the focus and goals of the Conference are not clear. There is substantial effort on the ALSDE staff to support this conference.
 - a. Review the goals of the MEGA conference and determine if the current delivery format meets those goals.
 - b. All MEGA Conference sessions should explicitly link to the ALSDE's goals as well as align to the Alabama's professional learning standards. When educators choose which session(s) to attend, they should clearly know what goal and/or strategy that is aligned to the session(s). Including a vast array of short professional learning sessions that are limited in their connection to the Department's initiatives is a missed opportunity.
- 44. Virtual Learning.** The ACCESS virtual learning program provides equal access to high quality instruction to all student learners across the state.
 - a. Continue to expand to capacity to increase course enrollment.
 - b. Continue to expand AP and other advanced course offerings. Based on the ACCESS course catalogue, there are 10 AP courses offered out of the 39 available from the College Board.
 - c. Use data to drive program design. Analyze and publish course success rates and enrollment trends to refine offerings. Determine course taking impact on college and career readiness.
- 45. PowerSchool Implementation.** The implementation of PowerSchool statewide has the potential exponentially improve educator, school, and district practice. By summer 2020, the Student Information System will be fully implemented statewide. By school year 2020-21, educators are expected to fully use all modules in the system. Statewide technology implementations are challenging, particularly ones that requires a dramatic shift in educator practice. Thoughtful and focused attention and long-term scenario planning must be given to ensure adoption success. While current PowerSchool training will focus on access to and use of the technologies, it is imperative that the ALSDE is developing subject matter guidance and complementary professional learning that will ensure deep adoption and long-term impact.
 - a. Ensure educators and administrators have multiple and relevant opportunities for system trainings that focus on practical applications.
 - b. Develop structures and guidance to support a data culture and inquiry-based thinking in schools and districts.
 - c. Develop a training plan to ensure educators, administrators, and technology coordinators know how to understand and apply data.
 - d. Create canned reports to encourage appropriate usage of analytics tools among less experienced end users and to create efficiencies among all end users.
 - e. Develop criteria to determine professional learning quality control on the Learning Management System.
 - f. Embed PowerSchool into all professional learning opportunities offered by the ALSDE. Ensure that RICs are doing the same.
 - g. Require all ALSDE staff to participate in end user training to ensure system understanding.
 - h. Launch a Communications Campaign that brands the tool specific to Alabama, generates system awareness, and creates excitement.
- 46. Charter Schools.** The Alabama School Choice and Opportunity Act passed by the legislature in 2016 ensures the likelihood that charter schools will be part of the educational landscape within Alabama in the upcoming years. Although the law was passed four years ago, charter school openings are still in their infancy stage with currently only four (4) opened and operated within the

state. With that said, more charter school applications are in progress and the ALSDE anticipates three (3) additional openings in the near future. Currently, the ALSDE has one person serving in the role of liaising between the ALSDE, the charter school operator, and the Alabama Public Charter School Commission. As the state begins to support these new schools, consider the following:

- a. Communicate internally the role that the ALSDE has in the support and oversight of charter schools. When probing about charter schools with ALSDE staff, there was a lot of confusion regarding roles and responsibilities of staff.
- b. Separate charter schools from virtual schools on the ALSDE website as well as internally. There is a lot of information focused on charter schools, but it is confusing when both entities share the same webpage. As more potential operators need pertinent information to launch a new charter school, that page will become a lifeline.
- c. Design a plan to build out the ALSDE staff for this team. One person as the liaison, but also providing technical assistance to new charter schools is unsustainable as the numbers grow.

I. List of Reviewed Documents

Below is a comprehensive collection of documents reviewed for the ALSDE Organizational Analysis and Study. While great effort was taken to fully capture all materials that informed the development of this report, given the quantity of documents received, it is possible not all documents reviewed have been included.

- 2018 State Appropriations Bill
- 2018 State Appropriations Comparison Sheet
- 2019 State Appropriations Bill
- 2019 State Appropriations Comparison Sheet
- 2020 State Appropriations Bill
- Additional FY21 Budget ARI State Funding, Draft (December 2019)
- Alabama Achieves Confidential Draft #1 (November 1, 2019)
- Alabama Achieves Edited Brochure with Strategies (Draft, December 30, 2019)
- Alabama Educator Evaluation Taskforce Members (November 2019)
- Alabama ESSA Plan, November 15, 2019
- Alabama Literacy Act: Journey to Success Implementation Guide (2019)
- Alabama Math Timeline (January 2020)
- Alabama Reading Initiative
- Alabama Reading Initiative Timeline, 1997-2020
- Alabama Science in Motion (ASIM) Act (Chapter 61C)
- Alabama State Department of Education 2019-2020 Compliance Monitoring On-Site Schedule
- Alabama State Department of Education Property Management Guidelines for Regional ARI Staff (March 14, 2017)
- Alabama State Department of Education Property Management Guidelines for ALSDE ARI Staff (October 2, 2017)
- Alabama State Motor Pool Online Vehicle Request System User's Guide, Version 1.0 (May 2004)
- Alabama State Personnel Department 2019 Merit System Employment Guide (Revised December 2018)
- Alabama Teacher Quantity and Quality Round Table Meeting #1 Agenda (September 30, 2019)
- Alabama Teacher Shortage Task Force Report (September 2019)
- Alabama's Draft MTSS Definition for Department Feedback (November 4, 2019)
- Alabama's Roadmap to STEM Success: A Strategic Plan for STEM Education (November 2019)
- ALSBE Work Session: ALSDE Reorganization Plan Update (April 12, 2018)
- ALSDE 2018-2019 Comprehensive Compliance Monitoring On-Site Manual (Revised June 28, 2018)
- ALSDE Compliance Monitoring Review 2018-2019 (Eufaula City Board of Education)
- ALSDE Educator Certification Processing – Assessment (November 2019)
- ALSDE FY19 Schedule of Federal Awards
- ALSDE Organization Effectiveness Study (December 15, 2017)
- ALSDE Reading Initiative
- AMSTI Three-Year Strategic Plan (Modified November 12, 2019)
- AMSTI Waitlist, Spreadsheet of LORs and MOAs (2017)
- ARI FY20 Budget/ARI State Funding Draft (October 2019)
- ARI Property/Inventory Procedures
- ARI Reading Coaches Description from Karen Porter (January 9, 2020)
- Budgeted Position Profile FY2020
- Certification Responsibilities and Duties

- Code of Alabama – Title 16: Education – Section 16-2-7 – Appointment, compensation, benefits, etc., of assistant state superintendents of education and division directors in State Department of Education; filling of vacancies
- CSI Allocations & Supports for Districts & Schools, Comprehensive (January 2, 2020)
- Curriculum and Instruction Meeting Briefing (January 2020)
- Department Level Budget Analysis Report by Cost Center, FY19, Period 12 (Preliminary)
- Department Level Budget Analysis Report by Fund Source, FY19, Period 12 (Preliminary)
- Description of the Mega Conference Committee 2020
- ECS Request: 3rd Grade Literacy Law Components, Comparison with other states
- Educator Evaluation PowerPoint (October 22, 2019)
- Efficacy of the Alabama Math, Science, Technology Initiative (AMSTI)
- ELL FY21 Budget State Funding Request, Draft (December 2019)
- ESSA Overview, Including Amendments PowerPoint (December 2019)
- Funding for Math Coaches, FY21 Budget Request (December 16, 2019)
- Funding Request for 2020 Math Coach Pilot
- Grants Update from Susan McKim (November 2019)
- Human Resources Notes
- Instructional Services Staff Organization and Task Structure (September 2019)
- Introduction to Regional In-Service Centers (November 2019)
- Key Responsibilities of Telena Madison, Professional Learning
- Legislative Report: 2019 Alabama National Board-Certified Teachers (NBCT) Report (September 2019)
- Legislative Report: Alabama Digital Tools for Teachers Initiative (September 2019)
- Legislative Report: Alabama Reading Initiative (ARI) (October 2019)
- Legislative Report: Alabama Science in Motion (ASIM) (October 2019)
- Legislative Report: AMSTI FY20 (October 2019)
- Legislative Report: Charter Schools (November 2019)
- Legislative Report: Provisions Regarding Compensation for Earned Advanced Degrees (September 2019)
- Math ACOS PD Rollout Plan Draft #8, Phases I-V
- Memorandum: Exception of Overnight Per Diem for Trip Less than 100 miles One Way (July 8, 2019)
- Memorandum: Justification for In-State Travel (June 24, 2019)
- Memorandum: School Safety: Getting Back to the Basics Regional Trainings (September 25, 2019)
- Memorandum: Youth Mental Health First Aid Training (March 18, 2019)
- Mississippi Literacy Act Implementation Guide (Revised 2016)
- MTSS Framework Visual, Draft 3
- Organizational Charts
 - ALSDE Accounting
 - ALSDE Organizational Chart (August 22, 2017)
 - ALSDE Organizational Chart (January 12, 2015)
 - ALSDE Organizational Chart (June 25, 2015)
 - ALSDE Organizational Chart (June 8, 2017)
 - ALSDE Organizational Chart (September 2018)
 - ALSDE Organizational Chart 2017 PowerPoint – Dr. Dee Fowler
 - AMSTI
 - Child Nutrition Programs
 - Education Technology
 - Educator Certification

- Evaluation, Accountability, and Support
 - Human Resources
 - Information Systems
 - Instructional Services
 - LEA Accounting and Reporting
 - Procurement and Operations
 - Professional Learning (November 2019)
 - Proposed ALSDE Organizational Chart (April 2018)
 - Pupil Transportation
 - Special Education Services
 - Student Learning
 - Teaching and Learning
- Position Classification Questionnaire, Personnel Department, State of Alabama (Revised January 1995)
- PowerSchool Student Information System Trainings – Rhett Cutts
- Presentation to Joint Legislative Committee on Finance & Budgets, FY2021 (January 22, 2020)
- Process to Fill Vacancy
- Professional Learning Organizational Chart (November 2019)
- Quick Reference Guide: Selected Student Codes & Application Navigation
- Region 7 Comprehensive Center (R7CC) Draft Logic Models for 2020
- Regional In-Service Centers and ALSDE Survey
- Regional In-Service Centers Funding (2020)
- Remediation Data by LEA Senior Class of 2018
- SBOE Administrative Codes:
 - Chapter 290-030-040
 - Chapter 290-040-040
 - Chapter 290-070-010
 - Chapter 290-070-020
 - Chapter 290-070-030
 - Chapter 290-070-040
 - Chapter 290-070-050
 - Chapter 290-080-010
 - Chapter 290-080-020
 - Chapter 290-080-030
 - Chapter 290-080-040
 - Chapter 290-080-050
 - Chapter 290-080-060
 - Chapter 290-080-070
 - Chapter 290-080-080
 - Chapter 290-080-092
 - Chapter 290-090-010
 - Chapter 290-090-020
 - Chapter 290-1-1
 - Chapter 290-1-2
 - Chapter 290-1-5
 - Chapter 290-2-1
 - Chapter 290-2-4
 - Chapter 290-3-1
 - Chapter 290-3-2
 - Chapter 290-3-3
 - Chapter 290-3-5
 - Chapter 290-3-6

- Chapter 290-4-1
 - Chapter 290-4-3
 - Chapter 290-4-5
 - Chapter 290-8-8
 - Chapter 290-8-9
- School Safety Model
- Single Audit FY16
- Single Audit FY17
- Single Audit FY18
- Special Nutrition Programs, Management Evaluation Corrective Action Response FY18, National School Lunch Program & School Breakfast Program (October 31, 2018)
- Special Nutrition Programs, Management Evaluation Report FY17, Child and Adult Care Food Program (March 14, 2017)
- Special Nutrition Programs, Management Evaluation Report FY17, Summer Food Service Program (June 25, 2018)
- Special Nutrition Programs, Management Evaluation Report FY19, The Emergency Food Assistance Program (September 3, 2019)
- State Department of Education Review – Questions from Cynthia McCarty (shared on December 12, 2019)
- State of Alabama Department of Education Organization Effectiveness Study, Preliminary Report (Kenning Consulting, December 15, 2017)
- State of Alabama Personnel Department Merit Semi-Monthly Compensation Plan (October 1, 2019)
- Strategic Planning Committee for Reading (2017 Report)
- Superintendent Survey (Fall 2018)
- Take 10 for Public Education Demographic Reports
- Teacher Evaluation Task Force, October 2019-March 2020
- The School Safety Platform: EOPs Analysis Materials
- Three-Tiered Model of Interventions for Mental Health (Draft)