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Commissioner of Education and Chief Learner

KENTUCKY DEPARTMENT OF EDUCATION
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June 7, 2022

Molly McComas, Superintendent
Clark County Public Schools
1600 W Lexington Ave.
Winchester, KY 40391

Dear Superintendent McComas:

As you know, one goal of Kentucky Statewide Consolidated Monitoring (KSCM) is to help create opportunities for the programs in our schools and districts to look at new ways to collaborate and collectively meet our ultimate goal: increasing student achievement while closing gaps and positioning our students to be college- and career-ready. The team members from your visit have engaged in this collaborative process in order to produce the attached Consolidated Monitoring Report.

During the 2021-22 school year, the Kentucky Department of Education (KDE) conducted monitoring in the Clark County School District. During this process, KDE program staff, utilizing program-specific monitoring tools, conducted on-site visits for the following programs:

- Title I, Part A
- Title II, Part A
- Title III, Part A
- Title IV, Part A
- Title V, Part B
- Preschool
- Career and Technical Education (CTE)
- Alternative Education Programs
- Gifted and Talented
- Individuals with Disabilities Education Act (IDEA)

Each program involved in the KSCM has an impact on our goal. For example, Title II, Part A focuses on improving teacher and principal quality to ensure that all students have equal access to highly qualified and effective teachers and leaders. Title I programs provide not only funding, but also guidance on working with disadvantaged students.

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This report is the result of what can be best described as a “snapshot” of the district taken during our visit. It begins with identifying “effective practices.” These are individual program practices that the team felt were effective, and in some cases innovative. We strongly suggest that the practices identified be submitted to the KDE Best Practices [website](#).

Each district program has already been provided an individual report as required by federal or state law. All findings will need to be addressed by district program areas as specified in the individual reports.

In the meantime, if you have questions regarding specific program monitoring requirements, please contact the individual program contacts listed in this report. If you have questions concerning the consolidated monitoring process, please contact [Erin Sudduth](#) by email or by phone at (502) 564-3791, Ext. 4021. Information regarding education programs within the state of Kentucky may also be found at www.education.ky.gov.

Thank you for your work in improving Kentucky’s education programs to better serve our children.

Sincerely,

Kelly Foster, Ed.D.
Associate Commissioner
Office of Continuous Improvement and Support
Kentucky Department of Education

KF/TR/ES/vb

Attachment: Consolidated Monitoring Report for Clark County Public Schools

2021-2022 Statewide Consolidated Monitoring Report

District:	Clark County
Date(s) of Visit:	March 22-23, 2022
Team Leads:	
<i>Title I, Part A – Emily Meade</i>	<i>Career and Technical Education (CTE) – Claude Christian</i>
<i>Title II, Part A – Kathy Collins</i>	<i>Alternative Education Programs – April Stanley</i>
<i>Title III/English Learners (EL) – Neil Watts</i>	<i>Gifted and Talented – Kathie Anderson</i>
<i>Title IV, Part A – Lee Bowling</i>	<i>Individuals with Disabilities Education Act (IDEA) – Jessica Jones</i>
<i>Title V, Part B – Erin Sudduth</i>	<i>Preschool – Malaika Williams</i>

Highlight of Effective Practice No. 1

Programs Addressed	Title I, Part A	X	Career and Technical Education	
	Title II, Part A		Alternative Education Programs	X
	Title III/English Learners (EL)		Gifted and Talented	
	Title IV, Part A		IDEA	
	Title V, Part B		Preschool	
<u>Community</u>				
<p>The district has established the Relatives as Parents Program (RAPP) to support relatives who have become guardians. The program meets monthly and provides a variety of supplemental trainings to assist relatives in supporting their students in school.</p> <p>The Phoenix Academy has strong connections with the community and involves stakeholders, including parents and students, in decision making.</p>				

Highlight of Effective Practice No. 2

Programs Addressed	Title I, Part A		Career and Technical Education	
	Title II, Part A		Alternative Education Programs	
	Title III/English Learners (EL)		Gifted and Talented	
	Title IV, Part A		IDEA	X
	Title V, Part B		Preschool	

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Parent and Family Engagement

The IDEA monitoring team notes that parents are invited and participate in their student’s Admissions and Release Committee (ARC) meetings. The district is committed to working with parents’ schedules to enable them to attend ARC meetings. Parent participation in ARC meetings has become more consistent since the district began incorporating alternate means of attendance such as Google Meets and phone calls.

Highlight of Effective Practice No. 3

Programs Addressed	Title I, Part A	X	Career and Technical Education	
	Title II, Part A		Alternative Education Programs	
	Title III/English Learners (EL)		Gifted and Talented	
	Title IV, Part A		IDEA	
	Title V, Part B		Preschool	

Student Services

The district recently implemented a revised multi-tiered system of support (MTSS). The district and school MTSS teams hold monthly meetings to analyze data and provide support regarding student behavioral needs. This implementation allows the district to analyze student behaviors and provide wrap-around services to best meet the needs of students.

Highlight of Effective Practice No. 4

Programs Addressed	Title I, Part A		Career and Technical Education	
	Title II, Part A		Alternative Education Programs	X
	Title III/English Learners (EL)		Gifted and Talented	
	Title IV, Part A		IDEA	X
	Title V, Part B		McKinney-Vento/Homeless	

Policies and Procedures

The district has special education policies and procedures in place based on the requirements of IDEA. Special education facilitators have been assigned to schools who serve as ARC chairpersons to assist with consistency and ensure compliance.

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The Phoenix Academy has multiple processes in place for continuous reflection and improvement for their students’ academic success and social-emotional well-being. Processes are also in place to foster the growth of the program and staff well-being.

Highlight of Effective Practice No. 5

Programs Addressed	Title I, Part A	X	Career and Technical Education	
	Title II, Part A	X	Alternative Education Programs	
	Title III/English Learners (EL)	X	Gifted and Talented	
	Title IV, Part A		IDEA	X
	Title V, Part B			

Professional Development

The New Teacher Mentoring Program has been successfully employed at the district level to provide much needed support to new teachers. This program provides new teachers with the tools to ensure success during their first school year through monthly cadre meetings, assigned mentors within their school and observations.

During Title II, Part A monitoring interviews, principals indicated that mentor teachers are extremely beneficial in the support of new teachers.

The district provides numerous opportunities for staff involved with the instruction of English Learners (ELs) to ensure that staff has the capacity to effectively provide EL instruction.

Beginning of the year trainings for IDEA focused on co-teaching and progress monitoring tools.

Highlight of Effective Practice No. 6

Programs Addressed	Title I, Part A		Career and Technical Education	
	Title II, Part A		Alternative Education Programs	X
	Title III/English Learners (EL)		Gifted and Talented	
	Title IV, Part A		IDEA	
	Title V, Part B		Preschool	X

Leadership

The Phoenix Academy has tremendous leadership in place that is invested in the success of the program as well as the well-being of students and staff. The principal and staff have established

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processes for continuous improvement through multiple assessments of data and go above and beyond to provide opportunities for the students in the program.

The Clark County Preschool has benefitted from strong leadership. Student arrival and departure, student information and staff professional development reflect intentionality in identifying and addressing needs as well as improving service delivery for preschool children.

Highlight of Effective Practice No. 7

Programs Addressed	Title I, Part A		Career and Technical Education	
	Title II, Part A		Alternative Education Programs	X
	Title III/English Learners (EL)		Gifted and Talented	
	Title IV, Part A		IDEA	
	Title V, Part B		Preschool	X

Climate and Culture

The Phoenix Academy has a positive climate that encourages strong relationships, positive behavior interventions and trauma-informed practices. The school has created a feeling of family and community among staff and students. The staff works with limited resources to create an outstanding environment for students.

The Clark County Preschool Program provides an enriching environment for children to learn and grow. Staff exhibit care and concern for one another and are attentive to the educational, social and emotional needs of each student in their care.

Opportunity for Improvement No. 1

Programs Addressed	Title I, Part A		Career and Technical Education	
	Title II, Part A	X	Alternative Education Programs	
	Title III/English Learners (EL)		Gifted and Talented	
	Title IV, Part A	X	IDEA	
	Title V, Part B		Preschool	

Common Issue

Community

The district does not provide stakeholder involvement or consultation in the planning, design, implementation or evaluation of approved activities in the Title II, Part A application.

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The district does not maintain adequate documentation that all members of the stakeholder group are consulted or invited to participate in the stakeholder consultation meetings for the Title IV, Part A program. Students are not invited to be a part of this process and there is no evidence that the Title IV, Part A program is being evaluated at the district or school level.

Common Solution(s)/Recommendation(s)

The district should invite appropriate stakeholders to all meetings and ensure that adequate documentation is kept. All stakeholders should be provided the opportunity for input on federal program expenditures. The Title I, Part A and alternative education program monitoring teams identified community as a strength for the district. It is recommended that the district review the community outreach strategies implemented at the Phoenix Academy as well as the Relatives as Parents Program and expand the strategies implemented in those programs and use them as a model for obtaining feedback and input in other programs.

Opportunity for Improvement No. 2

Programs Addressed	Title I, Part A	X	Career and Technical Education	
	Title II, Part A		Alternative Education Programs	
	Title III/English Learners (EL)	X	Gifted and Talented	
	Title IV, Part A		IDEA	
	Title V, Part B	X	Preschool	

Common Issue

Parent and Family Engagement

The district does not provide effective opportunities for input from parents regarding planning Title I, Part A parent and family activities or evaluating activities that have already occurred. The activities that were provided did not encourage two-way communication or foster meaningful involvement of parents and family members.

The parent and family engagement events supported with Title V, Part B funds do not meet the intent and purpose of parent and family engagement under Title I, Part A. The events did not include an interactive component encouraging collaboration between families and schools.

Although the district provides flyers for family nights in languages other than English, there is no evidence of parent outreach specifically geared towards the families of EL students. Providing outreach to the parents of EL students above and beyond the outreach provided to all families is a requirement of both Title I, Part A and Title III, Part A.

Common Solution(s)/Recommendation(s)

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The district should obtain feedback from parents and family members regarding the types of activities in which they would like to participate. It may be beneficial to appoint a parent and family engagement lead position to support the schools and assist in developing a parent and family engagement plan for the year to ensure that all requirements are being met. The Title I coordinator and Title III coordinator should work together to develop supplemental outreach opportunities specifically for the parents of EL students. This outreach should inform parents of ELs how they can be involved in the education of their children and be active participants in assisting their children to attain English language proficiency, achieve at high levels within a well-rounded education and meet challenging state academic standards expected of all students.

Opportunity for Improvement No. 3

Programs Addressed	Title I, Part A	X	Career and Technical Education	X
	Title II, Part A	X	Alternative Education Programs	
	Title III/English Learners (EL)	X	Gifted and Talented	
	Title IV, Part A	X	IDEA	
	Title V, Part B	X	Preschool	
Common Issue				
<p><u>Finance</u></p> <p>The Kentucky Department of Education (KDE) monitoring teams from most programs determined the district does not maintain proper internal finance policies and procedures in place to ensure that funds are being spent in accordance with requirements and in a timely manner. The district and school financial expenditures are not consistent with the approved Grant Management and Application Planning System (GMAP) applications. A review of MUNIS budget reports indicated misalignments between the budget and the application as well as overspending in several object codes and unallowable expenditures.</p> <p>The timely spending of funds was a concern for the KDE monitoring teams for Title I-A, Title IV-A, Title V-B and CTE.</p> <p>The CTE monitoring team notes that at the time of the visit no program in the district qualified for Perkins funds. Each program is required to have an advisory committee that meets twice per year.</p>				
Common Solution(s)/Recommendation(s)				
<p>The district needs to ensure that there are policies and procedures that define internal controls to warrant timely and allowable expenditures of funds as well as the alignment of GMAP and MUNIS. Ensuring program spending aligns with the approved application is a requirement for federal funds. It is recommended the district create a written process or procedure to verify proposed expenditures are in the approved application before spending of funds occurs.</p>				

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The procedures should also outline how the district will ensure ongoing communication among the superintendent, federal program coordinators and finance officer. Meetings to discuss federal program expenditures should occur at least quarterly. Monitoring the spending of funds helps the district ensure that funds are spent in a timely fashion and that any carryover limitations are met. District and school needs assessments should be continuously reviewed throughout the year. Program budgets should be revised and updated in GMAP as changing needs are identified.

It is recommended that 75% of all Perkins funds be expended or encumbered by March 1 each year so that the funding benefits that school year's students.

Opportunity for Improvement No. 4

Programs Addressed	Title I, Part A	X	Career and Technical Education	X
	Title II, Part A	X	Alternative Education Programs	
	Title III/English Learners (EL)	X	Gifted and Talented	
	Title IV, Part A	X	IDEA	
	Title V, Part B	X	Preschool	
Common Issue				
<u>Policies and Procedures</u>				
<p>The KDE monitoring teams for Title I-A, II-A, IV-A, V-B and CTE note the district did not provide documentation of internal controls regarding financial obligations, time and effort or maintain proper documentation in order to monitor program compliance.</p> <p>The district does not have a procedure in place for reviewing and revising the Lau Plan which outlines the district's language instruction educational program for EL students. This plan should be reviewed every two years and revised accordingly as needed.</p> <p>The district does not have a CTE advisory committee. The committees must consist of a student, parent, teacher, school administrator and a business industry representative. The committee must meet twice a year. At the time of the visit, the program provided no evidence that these meetings have occurred.</p>				
Common Solution(s)/Recommendation(s)				
<p>It is recommended that the district commit to developing a districtwide policies and procedures manual that encompasses all federal programs. The policies and procedures included in the manual would allow the district to monitor expenditures and ensure funds are spent in a timely fashion on allowable activities.</p>				

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Opportunity for Improvement No. 5

Programs Addressed	Title I, Part A	X	Career and Technical Education	
	Title II, Part A	X	Alternative Education Programs	
	Title III/English Learners (EL)		Gifted and Talented	
	Title IV, Part A	X	IDEA	
	Title V, Part B	X	Preschool	
Common Issue				
<u>Communication</u>				
<p>The district was unable to provide evidence to the Title I, Part A monitoring team of collaboration with school councils, principals, teachers, parents and other community stakeholders to analyze data, evaluate schoolwide programs or participate in the development of the comprehensive district improvement plan (CDIP).</p> <p>The lack of evidence provided reveals there is no shareholder involvement or consultation in the planning, design, implementation or evaluation of approved activities in the Title II, Part A GMAP application.</p> <p>The Title IV, Part A program coordinator does not communicate or collaborate sufficiently with the finance officer and school principals.</p> <p>The Title V, Part B program coordinator does not collaborate sufficiently with other program coordinators to ensure that Title V funds are used to support only allowable activities under these programs.</p>				
Common Solution(s)/Recommendation(s)				
The district needs to incorporate regular communication into processes or procedures that it creates and ensure that proper documentation is readily available.				

Opportunity for Improvement No. 6

Programs Addressed	Title I, Part A	X	Career and Technical Education	X
	Title II, Part A	X	Alternative Education Programs	
	Title III/English Learners (EL)	X	Gifted and Talented	
	Title IV, Part A	X	IDEA	
	Title V, Part B	X	Preschool	

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Common Issue
<p><u>Leadership</u></p> <p>The KDE monitoring teams for Title I-A, II-A, IV-A, V-B and CTE note that there is no evidence of collaboration between federal program coordinators and district leadership.</p> <p>The Title II-A and CTE monitoring teams document that there is no clear understanding of who is the coordinator for these specific programs.</p>
Common Solution(s)/Recommendation(s)
<p>The district needs to clearly define the roles of all federal program coordinator positions to ensure that all requirements are being met with ample time to ensure effective implementation and use of funds. It is recommended that the district strengthen oversight of all federal programs with a clearly defined job description and timely communication.</p>

Final Overview

<p>The Clark County School district's initiative on revamping their MTSS program has assisted in ensuring that all needs of students are being met. Principal interviews reveal that placement of designated substitutes within each school has been extremely impactful in maintaining instruction, particularly through the COVID-19 pandemic.</p> <p>The district should work on developing policies and procedures manuals, continuous communication and more clearly defined roles and responsibilities for federal program staff. Clark County should explore ways in which funds can be coordinated to work together to support initiatives. For example, Title V-B funds can be used to support several programs, and Title I-A and Title II-A funds can be used in certain ways to support gifted and talented initiatives since gifted and talented funding is limited.</p> <p>During meetings, the district also should examine the outcomes of the programs to determine effectiveness; these results should help drive the use of funds. Another important source of input is the community and other stakeholders; the district should consider meeting with stakeholders to review the data, generate discussion about the needs in the district and request ideas for strategies. These processes could provide new perspectives and innovative ideas. Using structures such as meeting agendas and 30-60-90-day plans can help provide accountability for follow-through and successful implementation of initiatives. Stakeholder input should be utilized when the district and schools are developing their district and school wide plans.</p> <p>The monitoring team observed a variety of strengths across participating programs including Clark County's commitment to transform any opportunities for growth so that their students' needs can be accurately identified and met. Clark County should continue to implement and expand the MTSS program for student support and use the Relatives as Parents Program as a guide for other programs. The Phoenix Academy Alternative Education program utilizes their limited resources to promote a supportive and positive environment for their students. The program maintains strong community relationships, finds innovative ways to give students' academic and extracurricular opportunities and keeps student well-being and success at the center of all it does. In addition, the</p>

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New Teacher Mentor Program should be expanded to include teachers that have been newly hired to the district. The district needs to prioritize compliance for all required components of federal programs that are mandated by regulation.

The monitoring team is confident that the district can transform its opportunities for improvement into strengths through the diligent implementation of policies and procedures as well as modeling new practices based on effective practices currently in place.