California Department of Education
Federal Program Monitoring 2016-17
Notification of Findings

September 22, 2016

This is the official Notification of Findings (NOF) report of the review visit conducted by the California Department of Education (CDE). Because the methodology of the review involves sampling, it is not an assessment of all legal requirements. Nevertheless, the local educational agency (LEA) is responsible for operating its federal categorical programs in compliance with all applicable laws and regulations.

Local Educational Agency: San Leandro Unified (01612910000000)

Review Date(s): 09/19/2016 - 09/22/2016

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Program Reviewed	Program Reviewer	Total Findings
Adult Education (AE)	David Stang	0
Compensatory Education (CE)	Monique Moton	0
Career Technical Education (CTE)	Teri Alves	5
English Learner (EL)	Suzie Dollesin	3
Fiscal Monitoring (FM)	April Woodcheke	1

The LEA is required to resolve each Federal Program Monitoring (FPM) finding within 45 calendar days which ends on 11/06/2016. Corrective actions made to resolve findings must be implemented at all sites in the LEA and the new procedures must be used in the future.

When a FPM finding cannot be resolved within this 45 calendar day period, the LEA submits a resolution agreement request using the "Resolution Agreement" process via CMT. Authorized LEA staff may request suggestions from CDE staff on the resolution of findings.

NOTE: Copies of this report were distributed to the Agency. This is a public report and must be made available upon request. (California Public Records Act, Government Code section 6250)

Sites Reviewed	Programs Reviewed
Garfield Elementary (01612916002372)	CE, EL
John Muir Middle (01612916066518)	CE, EL
San Leandro Adult (01612910137489)	AE
San Leandro High (01612910137588)	CTE

Monitoring Results by Program

Adult Education

No program findings resulted from this monitoring review. No further action is required.

Compensatory Education

No program findings resulted from this monitoring review. No further action is required.

Career Technical Education

1. CTE 01: Advisory Committee

Each local educational agency (LEA) receiving Perkins IV funds must involve parents, students, academic and CTE teachers, faculty, administrators, career guidance and academic counselors, representatives of tech prep consortia (if applicable), business and industry, labor organizations, special populations, and other interested individuals in the development, implementation, and evaluation of CTE programs. The governing board of each school district participating in a CTE program shall appoint a CTE advisory committee to develop recommendations on the program and to provide liaison between the district and potential employers. The committee shall consist of one or more representatives of the general public knowledgeable about the disadvantaged, students, teachers, business, industry, school administration, and the field office of the Employment Development Department. Each CTE program assisted with Section 131 or 132 funds must have extensive business and industry involvement, as evidenced by not less than one annual business and industry advisory committee meeting and planned business and industry involvement in program activities as described in the Guidelines for the 2008-2012 Local Plan for CTE and instructions for the annual application for funds.

During site observation, conversations with CTE teachers, and the items uploaded by the LEA, San Leandro does not have an independent CTE Advisory Committee. San Leandro's uploaded list of CTE Advisory Committee members was actually the Eden Area ROP Advisory Committee.

The district must form its own CTE Advisory Committee comprised of San Leandro parents, students, academic and CTE teachers, faculty, administrators, career guidance and academic counselors, business and industry, labor organizations, special populations, and other interested individuals in the development, implementation, and evaluation of San Leandro's CTE programs.

In addition, the district must provide evidence that San Leandro's CTE Advisory Committee was approved by their governing board. The San Leandro CTE Advisory Committee must meet a minimum of once per year and provide an agenda, sign-in sheet, and minutes.

2. CTE 03: Inventory

3.2 A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.

3.4 If the LEA is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

After visiting the site, conversations with administration, and reviewing documents in CMT, there is no evidence that a physical inventory of Perkins funded property has been reconciled with district property records within the past two years.

San Leandro must provide evidence that the Perkins historical inventory is reviewed and reconciled with district property records. San Leandro's historical inventory list must include current inventory used in the classroom and the disposed equipment inventory, including copies of the VE-35 forms filled out and forwarded to the California Department of Education.

3. CTE 04: Perkins Funds Support CTE Programs

Funds made available under Carl D. Perkins Act, Title 1, Part C, must be used to support and improve CTE programs that:

Strengthen the academic, career and technical skills of students participating in career and technical education programs, by strengthening the academic and career and technical education components of such programs through the integration of academics with career and technical education programs in a coherent sequence of courses, such as career and technical programs of study;

Provide students with strong experience in and understanding of all aspects of an industry, which may include work-based learning experiences; Develop, improve, or expand the use of technology in career and technical education, which may include distance learning, strong academic and CTE skills (including the mathematics and science knowledge); and collaboration with technology industries to offer voluntary internships and mentoring programs; Provide professional development programs to secondary and postsecondary teachers, faculty, administrators, and career guidance and academic counselors who are involved in integrated career and technical education programs;

Evaluate the CTE programs including an assessment of how the needs of special populations are being met; Provide activities to prepare special populations, including single parents and displaced homemakers for high skill, high wage, or high demand occupations that will lead to self-sufficiency; Ensure the LEA charges costs to the program that are reasonable, necessary, and allowable in accordance with applicable statutes, regulations, and program plans.

In reviewing course outlines, interviews with the CTE teachers, and discussions with administration: San Leandro does not have a coherent sequence of CTE courses; San Leandro students are not exposed to all aspects of industry; There was no evidence that the different pathways worked in collaboration with industries to offer voluntary internships and mentoring programs; Professional development programs to San Leandro's CTE teachers was

primarily conducted at Eden Area ROP, with no evidence of industry-specific professional development happening elsewhere; Activities to prepare special populations for high skill, high wage, or high demand occupations was not evident; San Leandro Unified does not have a system in place to ensure that purchases are made in accordance with applicable statutes, regulations, and program plans. In a site review, there were expenditures in a keyboarding course that is not part of a CTE pathway, thus non-allowable per applicable regulations.

San Leandro Unified must post pathway courses that are in a logical sequence. CTE course materials (e.g., course descriptions and course outlines) must be submitted, showing alignment with the current CTE Model Curriculum Standards.

San Leandro must show agreements with industry partners wherein students have mentoring and/or internship opportunities.

San Leandro Unified must create and submit a professional development plan for their CTE teachers that is ongoing, familiarizes their CTE teachers with the CTE Model Curriculum Standards and keeps the teachers up to date with industry standards.

San Leandro must create and submit a plan to prepare special populations for high skill, high wage, or high demand occupations (labor market data should be accessed). Examples of evidence could be flyers for after-school programs, open lab hours for students who need extra time to finish projects, assistance for the special population students in a CTE course.

San Leandro Unified must provide evidence that the LEA will have personnel attend regional Perkins Training throughout the school year. San Leandro Unified must demonstrate that they have created a purchasing system that ensures that all purchases are in accordance with Perkins guidelines. San Leandro must remit payment per invoice for keyboarding class in the amount of $4340.00.

4. CTE 08: Indicators of Performance

All LEAs shall annually prepare and submit data directly to the California Department of Education (CDE) regarding the progress in achieving the local adjusted levels of performance on the core indicators of performance including disaggregated data for each of the core indicators for the student categories. The LEA must identify and quantify any disparities or gaps in performance by any category of students and must ensure no duplicative data is reported. The LEA makes the annual report available to the public through a variety of formats, including electronically through the Internet. The LEA must use annual evaluation results, including achieved core indicators performance levels, to determine needed program improvements, modifications, and professional development activities for staff.

Since San Leandro Unified does not have a consistent sequence of CTE courses, E-1 and E-2 data shown included courses that were not CTE and should not have been included in the E-1 and E-2 reports. Data personnel had not been trained in CTE course definition and policy, therefore the data submitted was not accurate and could not inform the success of the program.

In addition, yearly evaluation results, including core indicator performance levels to determine program improvements and strategies were absent. For example, strategies for attracting non-traditional populations into CTE courses were not apparent during site visit.

After clearing CTE 04 finding, San Leandro needs to collect and report E-1 and E-2 data only for identified CTE pathway courses. Then, data from these reports should be submitted.

After analyzing program specific data, improvement plans, modifications, and professional development plans for CTE courses and teachers should be submitted, including a plan for recruiting non-traditional students into CTE courses.

5. CTE 09: High Quality CTE Program

The State Board-approved CTE plan requires that each LEA receiving funds under Perkins include a sequence of courses in all CTE programs; provide students with coherent and rigorous content aligned with challenging academic standards and relevant technical knowledge and skills; and include the following planning, organizational, and instructional elements determined by the state to be critical to high quality CTE programs: Provide for the development of student leadership skills through an established career technical student organization or an alternate strategy that incorporates this instruction in all of the courses that make up the sequence; and have a coherent sequence of CTE courses, consisting of not less than two full-year CTE courses with a combined duration of not less than 300 hours.

During the site visit, reviewing the San Leandro website, and speaking with administration,there was evidence of only one pathway (business) incorporating student leadership into classroom instruction (CTSO--DECA).

San Leandro Unified School District's CTE courses and pathways were not all in a coherent sequence and are not all aligned with the State's CTE Model Curriculum Standards and Framework, focusing on current or emerging high skill, high wage, or high demand occupations, and do not include planned career awareness and exploration experiences.

San Leandro CTE courses must embed leadership opportunities for students in every pathway, as they do in their business pathway (DECA). The site must either affiliate with a CTSO, or cover all aspects of leadership independently into each course. San Leandro Unified must submit course outlines and a professional development plan that show evidence of leadership instruction.

Each pathway must be written into a coherent, articulated series of courses that fully cover the CTE Model Standards.

English Learner

1. EL 09: EL Program Inclusion in Development of the SPSA

The EL program must be included in the development of the Single Plan for Student Achievement (SPSA) and address items a-e outlined in section 9.1. In addition, the SPSA must be consistent with the district local improvement plans including the Local Educational Agency

Plan.

A review of the Title III Performance Goal 2 Budget Update, the Local Control Accountability Plan (LCAP), and interviews with staff reveal that the SPSA for each selected site is directly aligned to the LCAP, and, therefore, the site plans do not address items a-e.

The LEA must submit evidence of revisions to each site plan to include items a-e. In addition, this requires evidence of each SPSA as a Board agenda item and follow-up meeting minutes that demonstrate Board approval of each revised SPSA.

2. EL 14: Reclassification

The LEA must monitor the progress of reclassified pupils for a minimum of two years to ensure correct classification, placement, and additional academic support, as needed.

A review of student cumulative records, documentation of data entry, and interviews with staff reveal that John Muir Middle School has identified ELs who have been reclassified yet underperforming in grade-level English Language Arts and/or Math. However, there is no documentation of teacher input nor the implementation of additional supports.

The LEA must submit live samples of progress monitoring forms for each student identified as reclassified per the 2014-15 list provided by the site administrator at Muir. The samples must include teacher input and the implementation of additional supports as needed (student names redacted).

3. EL 19: English Language Development

As part of the core program provided through general funds, each EL must receive a program of English language acquisition in order to develop proficiency in English as rapidly and effectively as possible, consistent with state priorities.

A review of documents, including the district's Master Plan for English Learners, parent notification letters and brochures, course rosters, interviews, and classroom observations reveal that at John Muir Middle School, only 28 ELs are enrolled in a core EL program (SEI) and that despite the LEA's overall EL program design, there is no evidence of designated English Language Development (ELD) instruction to meet the language acquisition needs of ELs within English Language Arts or other core content classes across all grade levels. Therefore, 182 of 210 ELs remain without ELD instruction sufficient to help them reach proficiency as rapidly and effectively as possible.

The LEA must submit evidence that all ELs are appropriately enrolled in a program of English language acquisition in order to develop proficiency in English as rapidly and effectively as possible, consistent with state priorities.

Fiscal Monitoring

1. FM 01: Timekeeping Requirements

To support salaries and wages for employees that work on federal programs, local educational agencies (LEAs) are required to maintain time accounting records that accurately reflect the work performed. LEAs that choose to participate in the substitute system based on sampling method to support salaries and wages charged to federal programs are required to maintain time accounting records for all employees that work on multiple activities or cost objectives every fourth month (three times a year). The time accounting must: (1) reflect an after-the fact distribution of the actual activity of each employee; (2) account for the total activity for which each employee is compensated; (3) be prepared for an entire month; and (4) be signed by the employee. Budget estimates or other percentages determined before the services are performed do not qualify as support for charges to federal awards. In addition, the time accounting records must be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable and properly allocated.

The CDE's review of the LEA's time accounting records, its policies and procedures over time accounting and interviews found that the LEA is incorrectly using the substitute sampling system for time accounting. Specifically, employees working on multiple activities or cost objectives reported budgeted percentages in each time study, rather than actual hours worked.

In order to resolve this finding the LEA must reimburse the Title I, Part A - resource 3010 program a total of at least $152,432 from an unrestricted funding source and provide evidence of this transfer for review of compliance. Additionally, the LEA must update its time accounting policies and procedures to ensure that all employees that work on federal programs maintain time accounting documentation in accordance with federal requirements. The LEA must provide a timeline and reasonable plan for implementing these new procedures for review.