



**Office of Education
Performance Audits**

EDUCATION PERFORMANCE AUDIT REPORT

FOR

MASON COUNTY SCHOOL SYSTEM

DECEMBER 2010

WEST VIRGINIA BOARD OF EDUCATION

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INTRODUCTION

An announced (five days in advance) Education Performance Audit of the Mason County School District and the county's schools was conducted October 25-28, 2010. A follow-up on-site review of Wahama High School was done since an individual school Education Performance Audit was conducted January 21, 2010. The review was conducted at the specific direction of the West Virginia Board of Education. The purpose of the review was to investigate reasons the county had not achieved adequate yearly progress (AYP) during the past five years and other existing circumstances that warranted an on-site review. The Team also reviewed district level high quality standards in accordance with appropriate procedures to make recommendations to the West Virginia Board of Education on such measures as the State Board considers necessary to improve performance and progress to meet the high quality standards that are required by W.Va. Code and West Virginia Board of Education policies.

The Education Performance Audit Team interviewed the Mason County Board of Education President and all board members; school district personnel, including the superintendent, the Assistant Superintendent for Personnel, Finance Director, finance employees, Director of Technology/Curriculum, Director of Federal Programs, and other county office personnel. The Team examined documents, including the Mason County Five-Year Strategic Improvement Plan; minutes of meetings and agendas of the Mason County Board of Education; personnel documents; personnel evaluations; the school system policy manual; regulatory agency reviews, i.e., financial audit, No Child Left Behind (NCLB) Federal Requirements Compliance Review, the Comprehensive Educational Facilities Plan (CEFP), etc.; and letters, faxes, electronic information, and materials of interest to the Education Performance Audit.

This report presents the Education Performance Audit Team's findings regarding the Mason County School District.

EDUCATION PERFORMANCE AUDIT TEAM

Mason County School District
October 26-28, 2010

Office of Education Performance Audits Team Chair, Dr. Donna Davis, Deputy Director

NAME	TITLE	COUNTY	CATEGORY
Deborah Calhoun	Assistant Superintendent	Tucker County School District	Title I / Curriculum, AYP (SES)/Technology Plan
Kathy Hudnall	Coordinator, Office of Assessment & Accountability	WV Department of Education	Special Education/ Curriculum/AYP (SE)
Monica Beane	Assistant Director, Office of Instruction	WV Department of Education	AYP/ Five Year Strategic Plan / High Quality Standards
Gary Price	Assistant Superintendent	Marion County School District	Personnel / Hiring
Shawn Hawkins	Coordinator, Office of Professional Preparation	WV Department of Education	Licensure
Carroll Staats	Member, County Board of Education	Jackson County School District	Evaluations/Administration
Don White	Assistant Superintendent	Mercer County School District	Policies
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COUNTY PERFORMANCE

ANNUAL PERFORMANCE MEASURES FOR ACCOUNTABILITY

This section presents the Annual Performance Measures for Accountability and related student performance data. It also presents the Education Performance Audit Team's findings.

5.1. ACCOUNTABILITY.

5.1.1. Achievement.

Adequate Yearly Progress

The No Child Left Behind (NCLB) data for the 2009-2010 school year identified that Mason County did not make adequate yearly progress (AYP). Mason County failed to achieve AYP for the last five years. Chart 1 shows the grade span/assessment and subgroup(s) that did not make AYP. It also shows the percent proficient for each grade span/assessment and subgroup.

The Team noted that when the performance of the subgroups listed in Chart 1 was compared with the 2008-2009 No Child Left Behind (NCLB) data, all subgroups identified below declined in academic performance.

Chart 1

WESTEST			
GRADE SPAN/ASSESSMENT	SUBGROUP	2009-2010 PERCENT PROFICIENT	2008-2009 PERCENT PROFICIENT
Mathematics – Elementary	Special Education	18.7%	36.3%
Mathematics – Secondary	Special Education	13.3%	16.5%
Mathematics – Elementary	Economically Disadvantaged	31.0%	49.9%
Reading – Elementary	Special Education	14.3%	26.5%
Reading – Secondary	Special Education	9.8%	18.7%

Chart 2 shows the number of Mason County's schools identified for not achieving AYP during the last five years out of the total number of schools. The chart also shows the percentage of schools that made AYP. Performance data for the 2009-2010 school year indicated that seven of the nine schools assessed for AYP met the AYP standards and two schools did not meet the AYP standards. One of the two schools was a school that had not made AYP the previous year. The following schools did not achieve AYP: Roosevelt Elementary School and Point Pleasant Junior/Senior High School. Note: The chart reflects Point Pleasant Primary School, a K-2 school, which grades are not assessed per the NCLB State Accountability Workbook.

Chart 2

NUMBER OF SCHOOLS NOT ACHIEVING AYP			
School Year	Number of Schools Below AYP	Total Schools	Percentage Achieving AYP
2005-2006	2	12	83.3%
2006-2007	3	11	72.7%
2007-2008	4	11	63.6%
2008-2009	5	10	50.0%
2009-2010	2	10	80.0%

Source: <https://wweis.k12.wv.us/nclb/private/nclbdata10/replistc1.cfm>

The school district percent proficient for the 2009-2010 school year revealed that all assessed subgroups at the elementary level mathematics: All students (AS), racial ethnicity/white (W), special education (SE) and economically disadvantaged (SES) subgroups fell below the State percent proficient. The middle level mathematics level did not have proficiency scores due to the inclusion of middle grades with the high school. However, at the high school level (Grades 7-12) all subgroups fell below the State proficiency levels with the exception of special education which was 1.8 points higher than the State (Charts 3-5).

All subgroups assessed for AYP at the elementary level reading/language arts (AS, W, SE, SES) achieved below the State percent proficient. Again, middle school subgroups were represented at the high school levels. The high school level reading/language arts percent proficient exceeded the State proficiency levels in all subgroups (Charts 6-8).

Chart 3

ELEMENTARY MATHEMATICS 2009-10		
Subgroup	District Percent Proficient	State Percent Proficient
All Students (AS)	40.8%	45.4%
White (W)	40.7%	46.0%
Special Education (SE)	18.7%	25.9%
Economically Disadvantaged (SES)	31.0%	35.3%

Chart 4

MIDDLE MATHEMATICS 2009-2010		
Subgroup	District Percent Proficient	State Percent Proficient
All Students (AS)	NA	42.8%
White (W)	NA	43.3%
Special Education (SE)	NA	16.2%
Economically Disadvantaged (SES)	NA	32.5%

NA: Not Applicable

Chart 5

HIGH SCHOOL MATHEMATICS 2009-2010		
Subgroup	District Percent Proficient	State Percent Proficient
All Students (AS)	38.6%	40.4%
White (W)	39.2%	40.9%
Special Education (SE)	13.3%	11.5%
Economically Disadvantaged (SES)	26.6%	29.1%

Chart 6

ELEMENTARY READING/LANGUAGE ARTS 2009-2010		
Subgroup	District Percent Proficient	State Percent Proficient
All Students (AS)	37.5%	44.0%
White (W)	37.7%	44.5%
Special Education (SE)	14.3%	20.2%
Economically Disadvantaged (SES)	28.6%	33.1%

Chart 7

MIDDLE READING/LANGUAGE ARTS 2009-10		
Subgroup	District Percent Proficient	State Percent Proficient
All Students (AS)	NA	43.2%
White (W)	NA	43.5%
Special Education (SE)	NA	13.1%
Economically Disadvantaged (SES)	NA	32.2%

NA: Not Applicable

Chart 8

HIGH SCHOOL READING/LANGUAGE ARTS 2009-10		
Subgroup	District Percent Proficient	State Percent Proficient
All Students (AS)	36.3%	35.5%
White (W)	36.6%	35.9%
Special Education (SE)	9.8%	9.5%
Economically Disadvantaged (SES)	25.7%	24.7%

SAT/ACT Assessment Results

Chart 9 shows the Mason School District's Scholastic Aptitude Test (SAT) and American College Testing (ACT) results. The SAT mean scores showed a decrease in both the Math Mean Score (from 564 in 2003-2004 to 362 in 2008-2009) and the Reading Score (from 498 in 2003-2004 to 383 in 2008-2009). The Mean Writing Scores also decreased from the 2006-2007 assessment (482) to the 2008-2009 assessment (442).

The Mason County School District's American College Testing (ACT) trend data showed variable composite scores annually. The percentage of students taking the ACT held steady from 2003-2004 through 2008-2009; however, a significant decline in test takers was shown in 2005-2006.

Students at Hannan High School scored significantly higher than the State average on the ACT in 2008-2009. However, students at Point Pleasant Junior/Senior High and Wahama High schools performed significantly below the State average (Chart 9A). This has implications for guidance and counseling and teachers' preparing students for college level assessment and 21st century skill learning.

Chart 9

SCHOLASTIC APTITUDE TEST (SAT) - District							
County	2003-2004	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010
SAT Takers (%)	2.2%	3.9%	8.3%	5.3%	10.5%	9.3%	NA
SAT Math Mean Score	564	487	488	493	459	362	NA
SAT Reading Score	498	525	495	511	474	383	NA
SAT Writing Score	NA	NA	NA	482	495	442	NA
AMERICAN COLLEGE TESTING (ACT)							
ACT Takers (%)	60.2%	55.6%	45.1%	58.6%	62.2%	60.3%	60.3%
ACT Composite	19.8%	20.4%	20.6%	19.8%	19.6%	20.0%	20.0%

NA: Not Available

Source: State, County and School Data, 2008-2009 West Virginia Report Cards, West Virginia Department of Education.

Chart 9A

AMERICAN COLLEGE TEST (ACT)			
	School	County	State
Hannan High School			
Test Takers	64.3%	60.3%	60.3%
Composite Score	21.6%	20.0%	20.7%
Point Pleasant Junior/Senior High School			
Test Takers	58.0%	60.3%	60.3%
Composite Score	20.0%	20.0%	20.7%
Wahama High School			
Test Takers	65.3%	60.3%	60.3%
Composite Score	18.3%	20.0%	20.7%

ACT EXPLORE Assessment Results

According to the Grade 8 ACT EXPLORE results in Chart 10, Mason County students showed an increase in English in 2008-2009 but the English score decreased again in 2010. The English score remained below the State average. The mathematics data also revealed that Mason County's 8th grade students' scores were below West Virginia's average during the five year trend data reported in Chart 10. Mason County performed above the State average in reading in 2008-2009 and 2009-2010. The county was below the State science average in all five years. Five years of trend data showed

that Mason County performed below the State composite during all five years; however, the county increased the composite score slightly each year.

Chart 10

ACT EXPLORE RESULTS					
Grade 8					
	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010
English WV	14.3	14.2	14.3	13.9	14.1
English Mason	13.7	13.7	13.6	14.0	13.9
Mathematics WV	14.5	14.5	14.7	14.3	14.6
Mathematics Mason	13.6	13.7	14.0	14.1	14.1
Reading WV	13.9	13.9	13.9	13.6	14.0
Reading Mason	13.3	13.6	13.7	13.9	14.1
Science WV	15.9	15.9	16.0	15.6	15.8
Science Mason	15.2	15.5	15.8	15.5	15.6
Composite WV	14.8	14.8	14.9	14.5	14.8
Composite Mason	14.1	14.3	14.4	14.5	14.6

ACT PLAN Assessment Results

Based on five years of Grade 10 ACT PLAN trend data depicted in Chart 11, Mason County test takers showed an insignificant up and down trend. The county ACT PLAN composite score declined from the 16.9 high in 2006-2007 to 16.1 in 2009-2010. Mason County's composite was lower than the State each of the five years; however, the State's composite showed a similar declining trend during the same time frame.

Chart 11

ACT PLAN RESULTS					
Grade 10					
	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010
English WV	16.8	16.7	16.3	16.3	16.3
English Mason	16.2	16.6	15.5	15.5	15.4
Mathematics WV	16.5	16.6	16.3	16.3	16.2
Mathematics Mason	16.2	15.8	15.5	15.8	16.0
Reading WV	16.6	16.5	16.5	15.7	16.1
Reading Mason	16.6	16.7	15.8	15.1	15.6
Science WV	17.8	17.7	17.5	17.1	17.3
Science Mason	17.2	17.9	17.0	16.7	16.8
Composite WV	17.1	17.0	16.8	16.5	16.6
Composite Mason	16.7	16.9	16.1	15.9	16.1

5.1.2. Participation rate. A minimum of 95 percent in the current or a two or three year average of all students enrolled in a public school/county school district/state at the time of testing, including students in each subgroup as required by *NCLB* must participate in the statewide assessment WESTEST or the West Virginia Alternate Performance Task Assessment (APTA) in reading/language arts or mathematics. Students with a significant medical emergency may be exempt by appeal from the calculation of participation rate for AYP provided that the county superintendent has proper documentation. (Policy 2340; Policy 2419; Policy 2510)

Mason County School District met the 95 percent participation rate for the statewide assessment.

5.1.3. Attendance rate (Elementary/Middle). The student attendance rate for elementary and middle schools is at or above 90 percent or the percentage of students meeting the attendance rate show improvement from the preceding year. The student attendance rate will be adjusted for students excluded as a result of the Productive and Safe Schools Act (W.Va. Code §18A-5-1a) and school bus transportation interruptions (W.Va. 126CSR81), West Virginia Board of Education Policy 4110, *Attendance Policy*, (hereinafter Policy 4110). Additional exclusions include excused student absences, students not in attendance due to disciplinary measures, and absent students for whom the attendance director has pursued judicial remedies to compel attendance to the extent of his or her authority. For the AYP determination, the attendance rate calculation will be used for accountability at the public school/LEA/SEA levels, but will not be calculated for each subgroup. However, for schools/LEAs that use the safe harbor provision to meet AYP for the achievement indicators, the attendance rate standard must be met by the subgroup/s not meeting AYP.

Chart 12 illustrates the attendance rates for the Mason County School District from 2005–2006 to 2009-2010. The student attendance rate for elementary and middle schools was above the 90 percent requirement during each of the five years shown in the chart.

Central office interviews indicated that each school has an incentive program for attendance. One school waives final examinations, one school has an end of year trip, and many schools have monthly and year end incentives.

Brochures were given to all secondary students and their parents and the attendance policy was reviewed with parents. Legal notices were sent to students' homes that include the student's attendance print out. In red ink, W.Va. Code states, "5 unexcused absences" and this has been helpful in getting the excuses from the parents.

The staff reported that when court proceedings are initiated, students have generally dropped out of school because they do not want to be punished because of attendance. The judge is not allowing them to drop out of school.

The staff was not aware of the new Graduate Equivalency Diploma (GED) options; they indicated the options will start in January and “Once we get the options, it will be better for attendance and dropout rates”.

After a student drops out of school, a letter is sent to the student that explains when the GED tests will be given. Credit recovery options were being utilized for students needing to graduate on time, but were limited because of attendance. Mason County uses Nova Net for credit recovery. A curriculum staff member discussed consideration of Success Maker for intervention.

Staff interviewed by the OEPA Team said that the root cause of poor attendance and high dropout is that parents and community do not value education. In order to help, the central office staff provides counseling on options available to students. Areas discussed included the value of graduating from school and the consequences of not graduating. Alternative school is an option for students who are at risk and, according to staff, provides an alternative setting that encourages students to attend school in a safe environment that meets their needs.

Chart 12

ATTENDANCE RATE	
Year	Attendance Rate
2005-2006	97.32%
2006-2007	97.32%
2007-2008	96.01%
2008-2009	96.32%
2009-2010	96.72%

5.1.4. Graduation rate. The student graduation rate is 80 percent or the percentage of students meeting the student graduation rate shows improvement. The graduation rate is calculated according to the high school completer formula recommended by the NCES with the additional condition that graduates include only those students who receive a regular diploma in the standard number of years and does not include students receiving the GED. For the AYP determination, the graduation rate calculation will be used for accountability at the public school/LEA/SEA levels, but will not be calculated for each subgroup. However, for schools/LEAs that use the safe harbor provision to meet AYP for the achievement indicators, the graduation rate standard must be met by the subgroup/s not meeting AYP.

Mason County School District's graduation rate showed an increasing trend from 79.43 percent in 2005-2006 to 84.56 percent in 2009-2010 (Chart 13). However, Hannan High School did not meet the 80 percent graduation rate required for high schools (Chart 14).

Chart 13

GRADUATION RATE	
Year	Graduation Rate
2005-2006	79.43%
2006-2007	79.43%
2007-2008	82.55%
2008-2009	83.44%
2009-2010	84.56%

Graduation rates for each of the Mason County's secondary schools are listed in Chart 14. Each high school in the county increased the graduation rate from 2007-2008 to 2009-2010.

Chart 14

WVEIS #	School Name	2009-2010 Percentage Rate	2008-2009 Percentage Rate	2007-2008 Percentage Rate	2006-2007 Percentage Rate
49-501	Hannan High	78.05%	77.78%	73.91%	86.00%
49-502	Point Pleasant Junior/Senior High	86.05%	85.02%	84.95%	77.62%
49-503	Wahama High	84.72%	83.05%	82.02%	80.00%
49-999	Mason County	84.56%	83.44%	82.55%	79.43%

DATA ANALYSIS

Chart 15 shows the number of Advanced Placement (AP), honors courses, and college credit courses offered in Mason County's high schools. The Team noted that more than 30 college courses were being offered at the Mason County Career Center for all Mason County's high school students.

Chart 15

NUMBER OF ADVANCED PLACEMENT (AP), HONORS, AND COLLEGE COURSES OFFERED 2009-2010			
High School	Number of AP Courses Offered	Number of Honors Courses Offered	Number of College Credit Courses Offered
Hannan High	4	0	2
Point Pleasant Jr./Sr. High	6	1	2
Wahama High	5	1	0

Chart 16 provides college entrance testing information for the American College Test (ACT). Data are listed for each Mason County high school, the county, and the State. Mason County students taking the ACT entrance test maintained the test taker percentages; however, the ACT composite score (20.0) was below West Virginia's composite score (20.7). Hannan High School's percent of test takers and composite score were higher than the State and the composite score was the highest of the three high schools in Mason County.

Chart 16

COLLEGE-ENTRANCE TESTING INFORMATION – ACT 2008-2009		
ACT (American College Test)		
Schools	% Test Takers	Composite Score
Hannan High	64.3%	21.6%
Point Pleasant Jr./Sr. High	58.0%	20.0%
Wahama High	65.3%	18.3%
Mason County Schools	60.3%	20.0%
State	60.3%	20.7%

Chart 17 shows that the percent of AP test takers increased in Grades 11 and 12. The percent of 2008-2009 district Grade 10 test takers was 0.0; Grade 11 was 12.4 percent, and Grade 12 was 14.1 percent. Data were not available to show the percent of test takers with a score of 3 or higher for the school district level.

Chart 17

ADVANCED PLACEMENT TEST (APT) (COLLEGE BOARD)					
Mason County	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009
10 th Grade Test Takers (%)	0.0%	0.0%	0.0%	0.5%	0.0%
11 th Grade Test Takers (%)	7.3%	17.5%	3.1%	11.3%	12.4%
12 th Grade Test Takers (%)	5.9%	18.9%	4.8%	11.0%	14.1%

Chart 17A provides the percent of AP test takers and the percent of test takers with a score of three (3) or higher for each Mason County high school from 2004-2005 to 2008-2009. Narratives are included within each school report.

Chart 17A

ADVANCED PLACEMENT TEST (APT) (COLLEGE BOARD)					
Hannan High					
	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009
10 th Grade Test Takers (%)	0.0%	0.0%	0.0%	0.0%	0.0%
11 th Grade Test Takers (%)	0.0%	19.2%	0.0%	0.0%	7.8%
12 th Grade Test Takers (%)	13.6%	0.0%	0.0%	0.0%	11.3%
10 th Grade Test Takers (%) with a score of 3 or higher	0.0%	0.0%	0.0%	0.0%	0.0%
11 th Grade Test Takers (%) with a score of 3 or higher	0.0%	0.0%	0.0%	0.0%	0.0%
12 th Grade Test Takers (%) with a score of 3 or higher	0.0%	0.0%	0.0%	0.0%	0.0%
Point Pleasant Jr./Sr. High					
	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009
10 th Grade Test Takers (%)	0.0%	0.0%	0.0%	0.5%	0.0%
11 th Grade Test Takers (%)	9.0%	22.1%	9.5%	11.3%	10.3%
12 th Grade Test Takers (%)	4.1%	24.2%	9.5%	11.0%	15.1%
10 th Grade Test Takers (%) with a score of 3 or higher	0.0%	0.0%	0.0%	0.0%	0.0%
11 th Grade Test Takers (%) with a score of 3 or higher	42.0%	24.0%	44%	30.0%	62.0%
12 th Grade Test Takers (%) with a score of 3 or higher	14.0%	11.0%	8.0%	17.0%	3.0%

Chart 17A (Continued)

ADVANCED PLACEMENT TEST (APT) (COLLEGE BOARD)					
Wahama High	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009
10th Grade Test Takers (%)	0.0%	0.0%	0.0%	0.0%	0.0%
11th Grade Test Takers (%)	7.0%	4.9%	1.3%	12.3%	19.7%
12th Grade Test Takers (%)	5.2%	16.9%	15.4%	14.8%	12.9%
10th Grade Test Takers (%) with a score of 3 or higher	0.0%	0.0%	0.0%	0.0%	0.0%
11th Grade Test Takers (%) with a score of 3 or higher	50%	33%	100%	25%	25%
12th Grade Test Takers (%) with a score of 3 or higher	40%	50%	42%	50%	40%

The high school graduate overall college going rate for Mason County for 2008-2009 was 55.4 percent compared to the State's overall college going rate of 61.5 percent as presented in Chart 18. Mason County's estimated college going rate was 6.1 percentage points lower than the West Virginia average in fall 2009.

Chart 18

ESTIMATED COLLEGE GOING RATE FALL 2009		
	Number of High School Graduates 2008-2009	Overall College Going Rate Percentage
State	18,418	61.5%
Mason County	269	55.4%

Source: West Virginia College Going Rates By County and High School Fall 2009
West Virginia Higher Education Policy Commission.

Chart 18A lists the estimated total number and percentage of high school graduates enrolled in institutions of higher education for each high school in Mason County. Hannan High School's college going rate (59.5 percent) and Wahama High School's college going rate (59.2 percent) were higher than the county (55.4 percent) and lower than the State's rate.

Chart 18A

ESTIMATED COLLEGE GOING RATE FALL 2009		
	Number of High School Graduates 2008-2009	Overall College Going Rate Percentage
Hannan High School	42	59.5%
Point Pleasant Junior/Senior High School	176	54.0%
Wahama High School	49	59.2%

Chart 19, High School Graduates Enrolled in Development Courses Fall 2009, indicates that 18 of Mason County's 118 first-time high school graduates or 15.25 percent were enrolled in Developmental English during fall 2009 and was comparable to the State total enrollment (15.53 percent). Twenty-seven (27) graduates or 22.88 percent were enrolled in Developmental Mathematics and was lower than the State total (of 24.31 percent).

Chart 19

HIGH SCHOOL GRADUATES ENROLLED IN DEVELOPMENTAL COURSES FALL 2009					
	1 st Time WV Freshmen Total #	English Total #	Percentage in Developmental English	Mathematics Total #	Percentage in Developmental Mathematics
State	8,311	1,291	15.53%	2,020	24.31%
Hannan High	21	0	0%	1	4.76%
Point Pleasant Jr./Sr. High	77	15	19.48%	22	28.57%
Wahama High	20	3	15.00%	4	20.00%
Mason County	118	18	15.25%	27	22.88%

Source: First-Time Freshmen, Previous Year WV High School Graduates in Developmental Courses by Type of Course Fall 2009 (census).

HIGH QUALITY STANDARDS

7.1. CURRICULUM.

7.1.1. Curriculum based on content standards and objectives. The curriculum is based on the content standards and objectives approved by the West Virginia Board of Education. (Policy 2510; Policy 2520)

1. The Team found some directives from central office staff that prohibited true standards-based instructional practice. For example, the directive to use only the adopted mathematics series for mathematics instruction limited teachers from using supplemental instructional materials to focus on the CSOs identified in West Virginia Board of Education (WVBE) Policy 2520.
2. While central office staff and documentation at the central office indicated that Policy 2510 was being implemented, Individual School Education Performance Audits indicated that CSOs were not always implemented at the school levels.
3. The Team found that all schools were using Acuity – benchmark tests and a Professional Development session was being undertaken to design a curriculum map for all students. Mason County plans to revise the curriculum maps and curriculum guides based on the input of Mason County teachers. Teachers at Point Pleasant Intermediate School have been trained on how to create benchmark items and were scheduled to convene in November to begin developing benchmarking items.
4. Mason County currently uses “SuccessMaker” to address deficiencies in reading and math. This program identifies initial placement according to Grades 3 and 8 student responses. The Team expressed concern that all students are assigned this scheduled period of time regardless of the initial score on the program. For example, a student who tests above grade level on day 1 is still required to remain in the class for the duration of the scheduled time. This is not true RtI. The Team recommended that an advanced tier or alternate option be provided for students who do not need an intervention program for skills in reading and math.
5. The Team observed the use of benchmark data, Individualized Education Program (IEP) implementation, and formative classroom assessment data for making informed decisions about student learning at the central office level. Individual School Education Performance Audits indicated that some schools were using these data sources and some were not.
6. A countywide emphasis was being placed on reading in all content areas. A countywide professional development was scheduled for all elementary teachers November 1 and November 4 (conducted by the West Virginia Department of Education).

7. West Virginia Clearinghouse is scheduled to be in Mason County schools in January 2011 to discuss the ACT EXPLORE and ACT PLAN assessments with teachers. This will assist in their efforts to use this data to make appropriate decisions regarding placement of students into advanced and/or advanced placement (AP) courses.

7.1.2. High expectations. Through curricular offerings, instructional practices, and administrative practices, staff demonstrates high expectations for the learning and achieving of all students and all students have equal education opportunities including re-teaching, enrichment, and acceleration. (Policy 2510)

Mason County Schools exceeded the minimum requirements of West Virginia Board of Education (WVBE) Policy 2510 regarding advanced courses, advanced placement (AP) courses, college and dual credit courses offering and Career Technical Education (CTE) certification courses. Because of enrollment, Hannan High School did not have AP courses on site, but takes advantage of the West Virginia Virtual School offerings. Students from all high schools are entitled to take advanced and college courses at the Mason County Career Center. However, the OEPA Team recommended that the data used to determine which students should take these advanced courses needed to be improved. There was little to no evidence that schools had a system to use data results provided from the ACT Plan and ACT Explore assessments.

7.1.3. Learning environment. School staff provides a safe and nurturing environment that is conducive to learning. (Policy 2510)

The Individual School Education Performance Audits reported that a safe and nurturing environment conducive to learning was being provided in all schools.

7.1.4. Instruction. Instruction is consistent with the programmatic definitions in West Virginia Board of Education Policy 2510, *Assuring the Quality of Education: Regulations for Education Programs* (hereinafter Policy 2510). (Policy 2510)

All requirements in West Virginia Board of Education (WVBE) Policy 2510 appeared to be in place at the central office. Individual School Education Performance Audits indicated that a few schools needed to review their programs of study.

7.1.5. Instructional strategies. Staff demonstrates the use of the various instructional strategies and techniques contained in Policies 2510 and 2520. (Policy 2510; Policy 2520)

1. The Team observed two memorandums sent to schools regarding instructional practice. One specific memorandum directed teachers not to use any supplemental mathematics materials during math instruction. The memorandum stated that teachers were to use only the materials provided in the adopted mathematics textbook series. This concerned the Team in that teachers indicated they could not use resources from TEACH 21 because the materials were not a part of the adopted textbook series. The second memorandum prohibited teachers from using

wikis and blogs (technology web 2.0 tools) in their classrooms. This prohibits the integration of some Project Based Learning units and other research-based instructional practices. Teachers should have the academic flexibility to vary from the textbook and use resources as instructional tools, just as a wiki and a blog may be used as tools to enhance instruction.

2. According to the director of curriculum and instruction, “Standards-based is a learning process for teachers.” Therefore, the county was concentrating on instruction in mathematics and reading/language arts. The county had arranged massive professional development in the newly adopted mathematics series. Mason County adopted mathematics materials from four different publishers. Approximately 60 percent of the teachers were trained in the area of mathematics.

7.1.6. Instruction in writing. Instruction in writing shall be a part of every child’s weekly educational curriculum in grades K through 12 in every appropriate class. (Policy 2510; Policy 2520)

Mason County has a countywide policy for implementation of writing across the curriculum. However, Individual School Education Performance Audits showed that a few schools needed to give more attention to instruction in writing and providing feedback on students’ written work.

7.1.7. Library/educational technology access and technology application. The application of technology is included throughout all programs of study and students have regular access to library/educational technology centers or classroom libraries. (Policy 2470; Policy 2510)

The Team reviewed a memorandum the director of curriculum/technology, issued last year (2009-2010) that required all personnel to cease and desist the practice of using blogs and wikis in classrooms. This counteracted the technology access for educators who wish to use such technology tools for instruction.

Additionally, administrators issued notification that teachers were not to create any worksheets or use supplemental materials that did not come directly from the adopted mathematics series. While there is an issue of “fidelity to the core”, this practice does not support standards based instruction. The math series is standards based, so the Team expressed concern that teachers were not aware of the ability to use Project Based Learning (PBL) units from TEACH 21 or other standards based instruction.

7.1.9. Programs of study. Programs of study are provided in grades K-12 as listed in Policy 2510 for elementary, middle, and high school levels, including career clusters and majors and an opportunity to examine a system of career clusters in grades 5-8 and to select a career cluster to explore in grades 9 and 10. (Policy 2510; Policy 2520)

Previously, Mason County Schools did not have an effective system for scheduling students. Because of this deficiency, students were not taking the appropriate courses required for graduation. This year (2010-2011), Mason County Schools developed a

“Course Handbook” for students, educators, counselors, and administrators. This, in conjunction with an electronic scheduling system, will simplify the course registration process. A bar code scanning system was established to ensure a check and balance procedure was in place for students entering the correct career pathway. This will provide a “red flag” to detect whether students attempt to enroll in a course that is not inside their appropriate career cluster. This system will be implemented districtwide at all programmatic levels.

7.1.11. Guidance and advisement. Students are provided specific guidance and advisement opportunities to allow them to choose a career major prior to completion of grade 10. (Policy 2510)

The Team found discrepancies in past procedures and current practice for scheduling and advising students. The Team reported a disconnect in the use of the ACT Plan and ACT Explore results in that students had not declared a career major and were not scheduling or enrolling in the appropriate courses. However, the new curriculum staff at the central office designed a plan for ensuring students take appropriate courses and declare a major. A personalized portfolio was developed for every student. This portfolio serves as a tool for consistent scheduling and maintaining consistent information from year to year as to the student’s correct career cluster.

7.1.12. Multicultural activities. Multicultural activities are included at all programmatic levels, K-4, 5-8, and 9-12 with an emphasis on prevention and zero tolerance for racial, sexual, religious/ethnic harassment or violence. (Policy 2421)

Mason County Schools has a policy in place mandating that multicultural activities exist in all schools based upon West Virginia Board of Education (WVBE) Policy 2421. The central office maintained a list of the curriculum and training in multicultural instruction at each school. This list was readily available to the Education Performance Audit Team. The Team’s review of the activities and training indicated alignment to WVBE Policy 2421.

7.2. STUDENT AND SCHOOL PERFORMANCE.

7.2.1. County and School electronic strategic improvement plans. An electronic county strategic improvement plan and an electronic school strategic improvement plan are established, implemented, and reviewed annually. Each respective plan shall be a five-year plan that includes the mission and goals of the school or school system to improve student or school system performance or progress. The plan shall be revised annually in each area in which the school or system is below the standard on the annual performance measures.

Five-Year Strategic Plan Review

As of November 3, 2010, the Mason County Five Year Strategic Plan had not been approved by the West Virginia Department of Education. The strategic plan needed revision. According to the October 20, 2010 County/School Strategic Plan Evaluating Rubric, the following categories needed to be reconsidered.

Category	Needs Reconsideration
Mission Statement	The mission statement was a little general in nature. It lacked detail regarding who participates in the Professional Learning Community – educators, students, central office.
Data Analysis – Key Outcome Indicators	Charts were included without a narrative of what the charts describe about student achievement to others and the district team. Charts are not necessary. The information and drawing on understandings from the data are important.
Data Analysis – Identified Priorities	Prioritized issues did not match data charts.
Goals/Objectives	Involvement of parents with test talks and with post secondary planning could enhance both goals.
Action Steps	Action steps did not have any subsections to delineate the work that is encompassed in the objective.
Parental Involvement	Parental involvement was not embedded into regular goals but did exist in federal compliances goals.

The Individual School Education Performance Audits revealed issues with the schools' strategic plans: Ashton Elementary, New Haven Elementary, Roosevelt Elementary, Point Pleasant Intermediate, and Wahama High schools and the Mason County Career Center.

Title I Strategic Plan Review

The Title I 2010-2011 plan showed all the required components; however, the Team noted from the interview that the county is in a five year corrective action process. The Team also noted that the county received a School Improvement Grant for Reading, which was providing many professional development opportunities. Title I staff revealed that a Title I monitoring in February 2010 identified 26 findings. Title I staff reported that the findings were being addressed.

Mason County has employed a school improvement coordinator and an instructional leadership coordinator to address instructional strategies and curriculum deficiencies identified throughout the economically disadvantaged (SES) subgroup. These positions addressed the instructional practices necessary to meet student skill deficiencies. As per the plan and from the interview, staff development was being addressed from an outside company, Solution Tree. The Title I staff said this company was contracted through a suggestion by the State Title I director. Other staff development opportunities listed in the Title I plan included: Mentoring programs, Professional Learning Communities (PLCs), Data Analysis, TechSteps, Acuity, Standards Based Instruction, and the five year plan reviews. However, numerous professional development sessions were being offered and served to benefit all instruction. It was unclear what specific professional development would benefit the Title I programs for their identified students. It was commendable that the blending and braiding of federal funding was used for professional development; however, ten percent of Title I funding should address the specific curriculum and training for instructors to implement said curriculum. Also, Title I employed reading and math coaches that are addressing student deficiencies through a variety of instructional methods, such as, pull out and in class collaboration. From the interview, the Title I director explained that the instructional leadership coordinator moves from school to school to address instructional methods through observations and modeling. A more efficient method might be to conduct professional development countywide and then visit all Title I schools on a more consistent rotation to address specific instructional methods as well as the implementation of identified curriculum.

Parent participation has increased from an almost nonexistent percentage to around 30 percent. The February 2010 Title I monitoring instructed Mason County to implement a parent advisory group. Central office Title I staff reported that the parent advisory group was instrumental in the parental involvement increase.

Title I has also implemented a curriculum driven after school tutoring program. This method identifies and addresses specific deficiencies for each student to ensure content mastery.

Title I and Marshall University are developing a cohort of teachers for the expected mathematics certification for Title I Mathematics teachers. According to the interview, this has been successful for the reading certification for the Title I teachers.

However, Mason County still has one substitute Title I reading teacher who does not meet the highly qualified definition. The interview also revealed that Response to Intervention (RtI) was not totally implemented due to the teachers and administrators not understanding the RtI process. According to the Title I plan, professional development is addressing this lack of understanding.

During the interview, the Title I director was unable to identify a method used for progress monitoring. The director identified this as a problem area for the RtI process; however, a professional development in Acuity was being offered and will be used for Title I programs to address the progress of their students.

The Team expressed concern that Title I staff were not identifying the trends (AYP, Participation Rates, Attendance Rates, and Graduation Rates) for the economically disadvantaged (SES) subgroup; consequently, the Title I plan's goals were based on current student data and not systemic problem trends.

Title I programs were monitored in February 2010 by a West Virginia Department of Education (WVDE) team led by the WVDE Title I director. This team identified several areas needing immediate corrective actions and the OEPA Team review of the documentation submitted to WVDE showed that Mason County's Title I plan contained developed goals to address the necessary action steps for the corrective procedures.

Technology Plan

Mason County's technology plan met all the requirements set forth in the strategic rubric. According to the plan, the digital divide, technology infrastructure reports, student to computer ratio, teacher to computer ratio, and bandwidth implementation are analyzed and used in the planning process. The Individual School Education Performance Teams reported that numerous schools needed to revise their technology plans: Beale Elementary, New Haven Elementary, Roosevelt Elementary, Point Pleasant Intermediate, and Point Pleasant Junior/Senior High schools and the Mason County Career Center.

All schools had a 10mb data line with the exception of one school; however, this school is controlled by the Frontier Vendor. Frontier will not provide the data lines for this school to upgrade to provide the needed bandwidth to use technology integration to the fullest. In the interview, the technology director revealed that the county has levy funds to pay for technology utilities; therefore, finances for bandwidth are not an issue in Mason County.

Objectives and goals in the technology plan were sufficient to accomplish the technology integration instruction throughout the curriculum. An examination of the digital reports indicated a measurable progression/sequence to meet the West Virginia Department of Education (WVDE) guided benchmarks for technology integration and the tools for implementation.

Numerous professional development opportunities were being offered to assist teachers with technology integration activities as well as the use of online assessments. Professional development included: TechSteps, Acuity, Use of Interactive Whiteboards, podcasting, Teach 21, Acuity, and Office products. The Team commended Mason County for braiding and blending funding to support technology integration professional development opportunities. Title I, EETT, Special Education, Title II, and TFS were the funding sources for the technology purchases and the professional development opportunities. The technology plan revealed that READ 180 and System 44 were used in the tiered instruction process; however, it is of particular interest that the Title I director during the interview was concerned that the Rtl process was an area that needed professional development and was not utilized as an instructional methodology.

In the interview, the technology director identified that four technology coaches had been employed to assist teachers with integrating lessons and also the hiring of three technicians that keep the equipment working as areas of strength. The technology director also noted that Mason County Schools works with the RESA technicians for support.

While the teacher to computer ratio report did not reflect current accuracy, the director stated all teachers have their own laptops and all classrooms have Interactive Whiteboards. Four out of the 11 schools did not meet the student to computer ratio; however, the benchmarks and objectives support the sequence of meeting the ratios by 2012-2013.

All of Mason County's computer labs have been placed on a four year replacement rotation as indicated in the chart within the technology plan. Action steps/sequences described the increase of access to technology for students and teachers and the innovative strategies to provide delivery of rigorous and specialized curriculum not otherwise available. Examples included: Nova Net for Credit Recovery and Alternate Education Classes, Success Maker for 3rd and 8th grade critical skills initiative, TechSteps, DIBELS and Compass Odyssey software. Edline was being used for parent communication throughout all schools in Mason County. The plan indicated that video conferencing equipment will be purchased and used for distance learning opportunities. According to the director, Mason County schools use West Virtual Schools to provide a rigorous curriculum for all students.

The abundance of technology tools and technology access is an area that is commendable in Mason County; however, this report is based on the review of county planning without extensive observation within the classrooms to verify the extent of its use.

7.2.2. Counseling services. Counselors shall spend at least 75 percent of the work day in a direct counseling relationship with students, and shall devote no more than 25 percent of the work day to counseling-related administrative activities as stated in W.Va. Code §18-5-18b. (W.Va. Code §18-5-18b; Policy 2315)

The Individual School Education Performance Audits found counseling issues at the following schools: Ashton Elementary, Leon Elementary, Point Pleasant Intermediate, Hannan High, and Point Pleasant Junior/Senior High schools.

7.4. REGULATORY AGENCY REVIEWS.

7.4.1. Regulatory agency reviews. Determine during on-site reviews and include in reports whether required reviews and inspections have been conducted by the appropriate agencies, including, but not limited to, the State Fire Marshal, the Health Department, the School Building Authority of West Virginia, and the responsible divisions within the West Virginia Department of Education, and whether noted deficiencies have been or are in the process of being corrected. The Office of Education Performance Audits may not conduct a duplicate review or inspection nor mandate more stringent compliance measures. (W.Va. Code §§18-9B-9, 10, 11, 18-4-10, and 18-5A-5; Policy 1224.1; Policy 8100; W.Va. Code §18-5-9; Policy 6200; Section 504, Rehabilitation Act of 1973 §104.22 and §104.23; Policy 4334; Policy 4336)

FYE 06-30-2009 Audit Report

The 2009 audit was completed and prepared by Sullivan Webb, PLLC of Huntington, WV. The overall report was unqualified.

The auditor's report on Compliance and Internal Control cited three significant deficiencies in internal control over financial reporting. (A significant control deficiency is defined as one which by itself or in combination with other deficiencies adversely affects the Board's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles that increases the likelihood [more than remote] that a misstatement of the financial statements would not be prevented or detected.)

Two of the control deficiencies were also cited as material weaknesses relating to the entity's ability to administer federal programs. (A material weakness is significant deficiency or combination thereof, that results in a more than remote likelihood that material noncompliance requirement of a federal program will not be prevented or detected by the entity's internal control procedures/processes.)

Audit Findings

1. Unlawful expenditures by local fiscal body. The Mason County Board of Education over expended funds of \$2,843,334 in the Capital Projects Fund, whereby, the deficit was transferred to the General Fund, which has placed the board in a position in which future revenues of the board's General Fund will be required to satisfy these over-expenditures.

The board received \$503,912.50 net proceeds from the auction sale of Point Pleasant Middle School. According to the deficit reduction plan established by the board, the deficit should be absorbed by 2014. Total reduction of deficit in FY 2010 was projected at \$817,547. Actual results are not known since the financial statements had not been prepared.

2. Internal Control Over Procurement Procedures – The Child Nutrition and Special Education offices had several invoices, whereby, the goods and/or services were ordered and/or received prior to the preparation and approval of a purchase order.
3. The child nutrition software program “malfunctioned” several times during the year at one school; thereby, for appropriate accounting records of the child nutrition funds collected or receivable were not provided.

Fiscal Year Ended June 30, 2010 Financial Statements

As of October 26, 2010 the financial statements for Mason County Board of Education had not been completed, published and/or submitted to the West Virginia Department of Education (WVDE).

W.Va. Code §18-9-3a requires the county board of every county to prepare and publish its annual financial statements within ninety (90) days after the beginning of the subsequent fiscal year. The publication must include a detailed schedule of expenditures listing the name of each firm, corporation, and person who received more than two hundred fifty (\$250) dollars in the aggregate from all funds paid from the previous year and the purpose for which expenditures were paid. The listing must also include all debts of the board. Except for the superintendent, the listing is not to include the name of any employee who has entered into a contract with the board.

Submission of Financial Statements to the State Department of Education: Every county board of education, RESA, and career/technical center is required to submit its annual financial statements for the year ended June 30, 2010, signed by the appropriate chief executive officers, to the State Department of Education, Office of School Finance, by September 28, 2010.

The submission to the Office of School Finance must include the following:

- Management's Discussion and Analysis
- Government-wide statements
- All applicable fund basis statements, including the fiduciary fund statements
- Reconciliation Schedules
- Budgetary comparison schedules for each fund
- All applicable notes to the financial statements
- Special projects worksheet prepared on WVEIS
- Schedule of encumbrances outstanding at year-end
- List of expenditures in excess of \$250
- Schedule of salaries paid to each board member and superintendent
- Schedule of all debts owed by the board
- Electronic financial data file on WVEIS

Financial statements had not been completed as of October 26, 2010. The Team noted that the new treasurer had only been employed a few months. The Team reported that the Mason County Board intends to have the financial statements for the fiscal year ended June 30, 2010 available for inspection no later than December 1, 2010.

Budget Process

W.Va. Code §11-8-9. Each local levying body must hold a meeting or meetings between the seventh and twenty-eighth days of March to ascertain the fiscal condition of the board. According to **W.Va. Code §11-8-10a**, the session is to stand adjourned until the third Tuesday in April, which extends the time that a levying body must meet, to the first day of June where a special levy is placed on the ballot for consideration during a primary levy.

The Team found that this meeting was timely held on March 23, 2010.

W.Va. Code §11-8-12. Each board of education at the session provided for in **W.Va. Code §11-8-9**, after having ascertained the fiscal condition of the board, determine the amount to be raised by the levy of taxes, prepare a Schedule of Proposed Levy Rates, and submit one copy to the state auditor and one copy to the state board of education.

Each levying body is required to publish the Schedule of Proposed Levy Rates (WVDE 11-20-36) forthwith after submission to the state auditor as a Class II-O legal advertisement in compliance with the provisions of **WV §59-3-1** et seq.

The Team reviewed the newspaper vendor statement and it appeared that the proposed levy rates were in fact published March 23, 2010; however, a copy of the publication could not be located. From the newspaper vendor statement, it was impossible to tell the number of times the publication appeared.

W.Va. Code §11-8-12a. Each board of education must reconvene the March meeting on the third Tuesday in April to officially enter all levies, after having received approval from the state auditor, unless a special levy is placed on the primary ballot.

The Team reported that this meeting was held April 20, 2010 in accordance with State Code.

W.Va. Code §18-5-4. Each county board is required to publish a notice of the budget hearing **at least 10 days** prior to the hearing. Notice of the budget hearing must be published as a Class I legal advertisement.

The Team did not find evidence that suggested this publication occurred.

W.Va. Code §18-9B-6a. Each county board is statutorily required to hold a budget hearing no later than May 31, 2010 concerning the proposed budget for the ensuing fiscal year not less than ten days after the budget has been made available for public inspection, but no later than May 30th. (Note: Since May 30th fell on a Sunday this year [2010], pursuant to the provisions of **W.Va. Code §2-2-1**, county boards had until May 31, 2010 to submit their proposed budgets.)

Based upon the Team's review of the Mason County Board of Education Minutes from March 23, 2010 to May 31, 2010, no evidence was found that a budget hearing was held.

W.Va. Code §11-8-12. After the hearing, the board must formally adopt its proposed budget for the subsequent year, pending approval by the State Superintendent of Schools. The proposed budget must be published as a Class II-O legal advertisement in compliance with the provisions of **W.Va. Code §59-3-1** et seq.

The Team reviewed the Mason County Board of Education Minutes from March 23, 2010 to May 31, 2010 and did not find evidence that the budget for fiscal year ending June 30, 2011 had been formally adopted. In addition, the Team did not find evidence that the budget was published in the newspaper as required.

In accordance with Budget Revision Instructions as published by the West Virginia Department of Education, Office of School Finance, "all carry-over budgets must be entered into WVEIS as soon as possible after the annual financial statements and special projects worksheet for the previous year are completed, but no later than **October 31.**"

The Team reported that since the financial statements had not been completed as of October 31, 2010, the budget carryovers had not been established by October 31, 2010.

Expenditure of Funds

W.Va. Code §18-9-3. The treasurer of the board may pay money only upon the order of the board. The order must specify the amount to be paid, the purpose, and the fund from which it is to be paid. The order shall be signed by the president and countersigned by the county superintendent as ex officio secretary to the board.

West Virginia Department of Education, Office of School Finance, verified that their interpretation of this State statute is that all checks must be approved by the board prior to their release to vendors.

During the OEPA on-site review, the Team noted that it has been the practice of the Mason County Board of Education to write and release checks prior to board approval. This was evidenced by the following sample of checks reviewed.

Date of Board Meeting Where Expenditure Was Approved	Check #	Check Date
May 25, 2010	71110	05/07/2010
May 25, 2010	71232	05/19/2010

W.Va. Code §12-3-18 requires that an itemized accounting be submitted by any claimant for services rendered or materials furnished before payment can be made; payment cannot be made until the services are rendered or materials furnished; and all payments must be approved by the governing body.

Detailed itemized receipts were not provided for the following payments.

Payee	Check #	Amount
Gaylord Opryland Resort	#67943	\$3,064.80
Glade Springs Resort	#66355	\$21,022.12

Note: The checks were written from a statement and individual invoices were listed; however, the itemized invoices were not attached. From the Team's review of the statement, consumer sales tax may have been paid.

The travel reimbursement policy indicates that receipts must be submitted for lodging, meals, and other costs. The following checks were issued without detailed receipts of meals eaten; therefore, it was impossible to verify that all charges were allowable.

Recipient	Check #	Amount
Board Member	#72052	\$27.23
Board Member	#70060	\$18.00
Board Member	#68848	\$7.50
Board Member	#67152	\$129.60
Board Member	#67135	\$147.00
Board Member	\$67124	\$223.69

Other costs where detailed receipts were missing from travel reimbursement requests included the following.

Recipient	Check #	Amount
Board Member	#68050	\$8.00
Board Member	#67354	\$8.00

Potentially Questioned/Unallowable Costs

The following information regarding the appropriate usage of IDEA, Part B ARRA Funds was obtained from the U.S. Department of Education website.

Allowable Uses of IDEA, Part B ARRA Funds

All IDEA ARRA funds must be used consistent with the current IDEA, Part B statutory and regulatory requirements and applicable requirements in the General Education Provisions Act (GEPA) and the Education Department General Administrative Regulations (EDGAR). An LEA must use IDEA ARRA funds only for the excess costs of providing special education and related services to children with disabilities, except where IDEA specifically provides otherwise.

- The IDEA ARRA funds constitute a large one-time increment in IDEA, Part B funding that offers states and LEAs a unique opportunity to improve teaching and learning and results for children with disabilities. Generally, funds should be used for short-term investments that have the potential for long-term benefits, rather than for expenditures the LEAs may not be able to sustain once the ARRA funds are expended. Some possible uses of these limited-term IDEA ARRA funds that are allowable under IDEA and aligned with the core reform goals for which states must provide assurances under SFSF include:
- Obtain state-of-the art assistive technology devices and provide training in their use to enhance access to the general curriculum for students with disabilities.

- Provide intensive district wide professional development for special education and regular education teachers that focus on scaling-up, through replication, proven and innovative evidence-based school-wide strategies in reading, math, writing and science, and positive behavioral supports to improve outcomes for students with disabilities.
- Develop or expand the capacity to collect and use data to improve teaching and learning.
- Expand the availability and range of inclusive placement options for preschoolers with disabilities by developing the capacity of public and private preschool programs to serve these children.
- Hire transition coordinators to work with employers in the community to develop job placements for youths with disabilities.

It appears that the Mason County Board of Education utilized IDEA, Part B ARRA to pay for a portion of the preparation of the new Mason County Board of Education Policy Manual and for the entire cost of a software program to allow Board Documents to be shared electronically, including, Board Agendas and the supporting documentation for such. The actual expenditures in question follow.

Vendor Paid	Check Date	Check #	Amount	Purpose
NEOLA, Inc	5/7/2010	71030	\$2,500.00	Board Policy Manual
WVSBA	4/7/2010	70634	\$10,600.00	Board Docs

Additionally, other payments were made to NEOLA utilizing State Fiscal Stabilization ARRA funding. The legitimacy of this expenditure is under question as well; however, these funds were not as stringent as IDEA, Part B ARRA funding.

The following information regarding the appropriate usage of Title II Funds was obtained from the Improving Teacher Quality State Grants ESEA Title II, Part A Non-Regulatory Guidance revised October 5, 2006, as published by the U.S. Department of Education.

Allowable Uses of Title II, Part A Funds

E-1. For what activities may an LEA use *Title II, Part A* funds?

Consistent with local planning requirements and its needs assessment, the *Title II, Part A* program offers an LEA the flexibility to design and implement a wide variety of activities that can promote a teaching staff that is highly qualified and able to help all students -- regardless of individual learning needs -- achieve challenging State content and academic achievement standards. Funds can also be used to provide school principals with the knowledge and skills necessary to lead their schools' efforts in increasing student academic achievement. For example, the statute specifically authorizes the following types of activities:

1. Developing and implementing mechanisms to assist schools to effectively recruit and retain highly qualified teachers, principals, and specialists in core academic areas (and other pupil services personnel in special circumstances, as noted in question E-6 of this document).
2. Developing and implementing strategies and activities to recruit, hire, and retain highly qualified teachers and principals. These strategies may include (a) providing monetary incentives such as scholarships, signing bonuses, or differential pay for teachers in academic subjects or schools in which the LEA has shortages; (b) reducing class size; (c) recruiting teachers to teach special needs children, including students with disabilities, and (d) recruiting qualified paraprofessionals and teachers from populations underrepresented in the teaching profession, and providing those paraprofessionals with alternate routes to obtaining teacher certification.
3. Providing professional development activities that improve the knowledge of teachers and principals and, in appropriate cases, paraprofessionals, in:
 - a. Content knowledge. Providing training in one or more of the core academic subjects that the teachers teach; and
 - b. Classroom practices. Providing training to improve teaching practices and student academic achievement through; (a) effective instructional strategies, methods, and skills, and (b) the use of challenging State academic content standards and student academic achievement standards in preparing students for the State assessments.
4. Providing professional development activities that improve the knowledge of teachers and principals and, in appropriate cases, paraprofessionals, regarding effective instructional practices that:
 - a. Involve collaborative groups of teachers and administrators;
 - b. Address the needs of students with different learning styles, particularly students with disabilities, students with special needs (including students who are gifted and talented), and students with limited English proficiency;
 - c. Provide training in improving student behavior in the classroom and identifying early and appropriate interventions to help students with special needs;
 - d. Provide training to enable teachers and principals to involve parents in their children's education, especially parents of limited English proficient and immigrant children; and
 - e. Provide training on how to use data and assessments to improve classroom practice and student learning.
5. Developing and implementing initiatives to promote retention of highly qualified teachers and principals, particularly in schools with a high percentage of low-achieving students, including programs that provide teacher mentoring from exemplary teachers and administrators, induction, and support for new teachers and principals during their first three years; and financial incentives to retain

teachers and principals with a record of helping students to achieve academic success.

6. Carrying out programs and activities that are designed to improve the quality of the teaching force, such as innovative professional development programs that focus on technology literacy, tenure reform, testing teachers in the academic subject in which teachers teach, and merit pay programs.
7. Carrying out professional development programs that are designed to improve the quality of principals and superintendents, including the development and support of academies to help them become outstanding managers and educational leaders.
8. Hiring highly qualified teachers, including teachers who become highly qualified through State and local alternate routes to certification, and special education teachers, in order to reduce class size, particularly in the early grades.
9. Carrying out teacher advancement initiatives that promote professional growth and emphasize multiple career paths (such as paths to becoming a mentor teacher, career teacher, or exemplary teacher) and pay differentiation.

Based upon the Team's review of the general ledger expenditures and supporting documentation, it appeared that Mason County Board of Education utilized Title II funds for board members' travel and professional development which is **not** expressly allowable under the Title II guidance.

Title II Funds paid for 100 percent of an Administrative Retreat at Glade Springs Resort (Check #67594 dated 9/9/09). Potentially unallowable costs for board members included on this statement are listed below.

Name	Amount
Board Member	\$748.00
Board Member	\$943.80
Board Member	\$943.80
Board Member	\$374.00
Board Member	\$899.80

Title II funds were utilized to reimburse board members for travel costs as indicated below.

Payee	Check #	Date	Amount
Board Member	67499	9/01/09	\$126.37
Board Member	68050	9/01/09	\$150.40
Board Member	67354	8/10/09	\$133.49

Title II funds were also utilized to pay the West Virginia School Boards Association (WVSBA) for professional services provided on August 4 and August 5, 2009. The invoice did not detail what kind of professional services were provided. Without a detailed itemization of the type of professional services provided the Team was unable to determine if this cost is allowable under Title II, Part A. The total paid for these services from Title II funds was \$909.50 (Check #67619 dated 9/9/09).

Construction Projects

Mason County Board of Education had two construction projects in progress during the fiscal year ended June 30, 2010. When the Team requested information for these two projects, bits and pieces of files were presented. There seemed to be no systematic filing system in place to maintain the records to ensure compliances with State statutes regarding construction projects.

W.Va. Code §18-5-12. Boards shall require all persons contracting for the building or repair of school property to post bond where the contract exceeds \$100.

Performance Bonds could not be located for the following construction contracts.

Contractor Name	Contract Amount
Southern Bleacher	\$659,440
Dixon Electric	\$240,900
Pro-Grass	\$505,197
Mid-Atlantic Construction	\$719,593

W.Va. Code §11-10-11. The State and all political subdivisions are to withhold final payment on all contracts until the receipt of a certificate from tax commissioner certifying that all taxes owed by the contractor have been paid. If applicable, county and municipal taxes must also be verified as paid.

Final payments on construction contracts were made during the fiscal year ended June 30, 2010 without any certification from the state tax commissioner, the county and/or municipality.

Construction Company	Date of Final Payment	Amount of Final Payment
Southern Bleacher	03/17/2010	\$65,944
Dixon Electric	10/07/2009	\$24,090
Pro-Grass	12/16/2009	\$18,000
Neighborgall Construction	06/18/2010	\$15,000

W.Va. Code §21-5A-2 requires the payment of no less than the prevailing wage to all workers engaged in the construction of public improvements.

The county office staff could not locate prevailing wage documentation for the duration of the construction projects in their entirety for any of the construction projects under review.

W.Va. Code §5G-1-1. Declaration of legislative policy. The Legislature hereby declares it to be the policy of the state, and its political subdivisions, to procure architectural or engineering services or both on the basis of demonstrated competence and qualification for the type of professional services required.

West Virginia Board of Education (WVBE) Policy 8200, *Purchasing Policies and Procedures Manual for Local Educational Agencies*, lists the following requirements for procuring architectural or engineering services.

- 11.1.2 For projects estimated to cost \$250,000 or more, architectural and engineering firms are to be encouraged to submit an expression of interest, which shall include a statement of qualifications and performance data, and may include anticipated concepts and proposed methods or approach to the project. All jobs must be announced by public notice published as a Class II legal advertisement in compliance with **WV §59-1-2**, et seq.
- 11.1.3 A committee of three (3) to five (5) representatives of the LEA shall evaluate these statements and select three firms, which, in the committee's opinion, are best qualified to perform the desired service, provided that, on projects funded wholly or in part by the West Virginia School Building Authority, two (2) of the three (3) firms selected must have had offices within the state for at least one year prior to submitting the expression on interest.
- 11.1.4 The committee shall then rank, in order of preference, no less than three (3) of the firms selected, and shall commence negotiations with the firms in the order of preference the scope of services and price for the work to be performed.

Documentation was not provided to verify that West Virginia Department of Education Policy 8200 or **W.Va. Code §5G-1-1** was followed to select an architectural firm for the construction projects that were started/completed during the fiscal year ended June 30, 2010.

Architectural Firm Contracted	Project	Contract Date
Architectural Vision	Beale Elementary	July, 2008
Thrasher Engineering	Athletic Complex	July 22, 2008

West Virginia Board of Education (WVBE) Policy 8200, *Purchasing Policies and Procedures Manual for Local Educational Agencies, (LEA)* states:

27. Credit Cards

27.1.1 A credit card program can include purchasing cards, vendor issued credit cards, or corporate credit cards for the payment of authorized travel related expenses.

27.1.2 An LEA may establish by board policy a credit card program as an alternative payment method when making purchases of commodities and services, or for the payment of authorized travel expenses. Credit cards, however, cannot be used to purchase land, buildings, vehicles, or equipment whose cost is above the LEA's capital asset control level threshold.

The Team reviewed Mason County Board of Education's policies prior to the adoption of NEOLA and reported that a board approved credit card policy was nonexistent. After the adoption of NEOLA (8/17/2010) a board approved credit card policy was in effect.

27.1.4 For cards issued in the name of designated employees, each designated employee must complete and sign an acknowledgement form provided by the LEA (See Appendix C) in which the employee acknowledges the responsibilities associated with becoming a cardholder.

Mason County Board of Education was not able to produce any signed employee acknowledgement forms although 26 corporate bank cards were currently issued. Four of the cards were issued without a specific employee's name.

27.1.6 Receipts

a. An itemized receipt must be obtained for each transaction charged on a card. The receipt must contain the following specific information and meet certain conditions:

- (1) Receipts must be itemized and include a description of the items purchased, unit price, quantity, and total cost for each item. Use of generic terms such as "miscellaneous" or "various merchandise" is not acceptable.
- (2) Receipts must show no balance due or be marked "paid."
- (3) Receipts must be totaled.
- (4) Receipts must show that the payment was by credit card.
- (5) All receipts should be kept in chronological order by date of purchase.

The Team reported that itemized receipts were not available for the following payments.

Credit Card Payments		
Check	Date	Amount
71157	5/17/10	\$242.01
70777	4/21/10	\$918.68
70909	5/4/10	\$459.10
70543	4/7/10	\$73.14
70709	2/14/10	\$541.10
69656	2/2/10	\$396.90
68458	11/4/09	\$168.89
67725	9/16/09	\$1,216.40
68355	10/30/09	\$408.09
Payment of Late Fee		
Check	Date	Amount
67256	8/06/09	\$35.00
67255	8/6/09	\$35.00

Possible Personal Use Violation.			
Check	Date	Amount	Item Purchased
71921	6/30/10	\$73.14	App for I-Phone
70543	4/7/10	\$73.14	Apple Online Store
70709	1/14/10	\$82.73	Car Charger

27.4.7 An LEA may obtain a corporate credit card for each employee to use in charging authorized travel related expenses. The cards must be issued in the name of the LEA and the individual card holder.

Mason County Board of Education had issued 26 corporate bank cards, four of the bank cards were issued without a specific employee's name.

27.4.8b. Each card must be issued in the name of an individual card holder. Only the employee whose name appears on the front of the card is an authorized user of the card. Cards cannot be issued generically in the name of the LEA or school.

Three corporate bank cards were currently issued in the name of Mason County Board of Education. One card was currently issued in the name of Wahama Jr/Sr High School.

While reviewing credit card payments the Team noted the following other items.

- West Virginia State sales tax had been charged and paid and several lodging, supplies, and equipment purchases had been made via credit card.

Sales Tax Paid			
Check #	Date	Amount	Vendor
68458	11/04/09	\$24.30	Ogelbay Resort (Total paid \$357.19)

- Gasoline was being purchased via credit card. The Team assumed that the gas was being utilized in a Mason County Board of Education vehicle; however, no notation was made regarding this fact.
- In addition, Mason County Board of Education is eligible to receive a refund of the West Virginia fuel excise taxes paid. Although the fuel excise tax returns were completed and filed, they did not include approximately 269 gallons of fuel purchased via a credit card. All returns to claim excise tax refund on purchases through June 30 must be submitted by August 31st of each year.
- Under the corporate credit card system being utilized by the Mason County Board of Education, points are individually earned by each cardholder. Guidelines were not established as to how, when, and for what purpose these points can be redeemed.

Overtime and Payroll

Prior to August 2010 there was no evidence of an Overtime Policy or Fair Labor Standards Act Policy for the Mason County Board of Education. Accordingly, overtime work had been performed by employees and paid without any oversight, planning, and supervision to scrutinize or verify that the overtime was actually needed and required. Based upon the documentation provided, it cannot be ascertained that all the overtimes were necessary. There appeared to be no approval process in place prior to the overtime occurring to maintain cost containment and to verify the legitimacy of overtime.

Finance/Payroll Policies

Overtime Policy 6700 (as of 8/17/10) appeared to be in conflict with the policy. The Overtime Policy references AG 6700 (Administrative Guidelines 6700) which were nonexistent as of October 27, 2010. In addition the policy referred to an "approval form" which could not be located by the staff.

Service Personnel Work Hours (as of 8/17/10) as posted on the Mason County Board of Education website were not reflective of actual county practices. The board approved policy indicated that all service personnel work an eight (8) hour day. However, practice

has been that cooks, aides, and school secretaries are scheduled for seven (7) hours a day while other service personnel (maintenance, mechanics, custodians, bus drivers, and administrative secretaries) are scheduled for eight (8) hours a day.

When these issues were discussed with appropriate personnel in charge of policies it was determined that Mason County Board of Education adopted the NEOLA policy document in its entirety on August 17, 2010 without any administrative guidelines, forms etc. These were to be formulated, prepared, and published at a later date. However, the NEOLA invoice, paid by check #71030, states "This is the six (6) month billing due upon signing the Complete Policy & Administrative Guideline Development contract."

The Team reviewing finance and fiscal procedures report that evaluations of the following service personnel were not found for the fiscal year ended 2010.

Employee	Type	Date of Last Evaluation
Service Personnel	Service	4/24/08
Service Personnel	Service	4/24/08
Service Personnel	Service	2/11/08 (not signed by anyone)

Job Descriptions.

Name	Description
Service Personnel	Not Provided as requested
Service Personnel	No indication of effective date, review, update
Service Personnel	Did not reflect her assigned duties, no indication of effective date, review, update

COMPENSATORY TIME

As discussed in preceding paragraphs, the Fair Labor Standards Act (FLSA) requires that covered, nonexempt employees be paid not less than one and one-half times their regular rate of pay for hours worked in excess of 40 hours during a workweek. The FLSA, however, provides an exemption for a public agency that is a state, a political subdivision of a state (including a county board of education), or an interstate governmental agency.

The exemption authorizes such public agencies to provide compensatory time off (within certain limitations discussed in the following paragraphs) in lieu of monetary overtime compensation that would otherwise be required. Compensatory time received by an employee in lieu of cash must be at the rate of not less than one and one-half hours of compensatory time for each hour of overtime work, just as the monetary rate for overtime is calculated at the rate of not less than one and one-half times the regular rate of pay.

The Act requires that an **agreement** or understanding between the employer and employee exist **prior to the performance of work**. **West Virginia Code §21-5C-3(f) (2)** further **requires that the agreement be in writing** and be recorded in the

employer's record of hours worked. The statute goes on to state that the written agreement may be modified at the request of either the employer or the employee, but under no circumstances can the changes in the agreement deny an employee compensatory time previously acquired.

Based upon the Team's review of timesheets it appears that compensatory time was being provided/utilized without the express written agreement prior to the performance of work.

W.Va. Code §6-2-12. Where certain bonds filed and recorded.

Every official bond given before, or approved by, the council or other similar body of any municipality, and every official bond given before, or approved by, any board of education of any magisterial district or independent district, shall be filed and preserved in the office of the recorder or clerk of such municipality, or in the office of the clerk or secretary of such board of education, as the case may be, and be recorded in the records of such council or other similar body of the municipality, or of such board of education, respectively, and a certified copy of every such bond shall, by such recorder, clerk or secretary, be forthwith made and filed in the office of the clerk of the county court of the county of such municipality or board of education, and said last-mentioned clerk shall record such copy in the book to be kept by him as aforesaid.

The treasurer was bonded; however, as of October 27, 2010 the bond had not been recorded with the County Clerk. There was no evidence that the county's superintendent and the board president were appropriately bonded and recorded with the county clerk. The superintendent indicated that the board president, superintendent, and treasurer are all bonded but the recording has not been completed as the insurance company has not returned the paperwork to date.

Facilities

The Education Performance Audit Team reviewed the Mason County Comprehensive Educational Plan (CEFP), interviewed the Director of School Facilities, the county superintendent, and visited schools. A narrative of the Team's observations follows.

Ashton Elementary School

This facility is located on 9.9 acres and meets the current West Virginia Board of Education acreage requirements. The main portion of this building was built in 1991. A four classroom addition was added in 2001. The Heating Ventilation and Air Conditioning (HVAC) system is original to this building. The classrooms are served by self contained wall units. The units allowed local access to the fan control. These units had not been properly maintained. Many of the units were in unacceptable condition. Several of the units had airflow restrictions (dirty coils) that reduced airflow by 90 percent. Additionally, four rooftop units serve the office area, cafeteria, media center, and gymnasium. These units were also original to the building and beyond the expected life of the equipment. The rooftop units also had airflow restriction issues due to lack of maintenance. These issues were also noted in a recent Indoor Air Quality investigation by the West Virginia Department of Education, Office of School Facilities.

This facility also had some water infiltration issues that included water infiltrating the roof deck as well as infiltrating through the exterior walls resulting in efflorescence. The rear sidewalk on the building appeared to be settling and pulling away from the building. There were also some minor exterior wall cracks. Some of the playground equipment did not have adequate safety material installed. Pea gravel was on-site that appeared to be intended for the playground. The gravel was dumped through a chain link fence and partially obstructed a sidewalk. Two exterior classroom doors were propped open during the Team's walk-through. Exterior doors are not to be propped open and this should be addressed in the access safety plan. Several classrooms had carpet which appeared to be at the end of its life expectancy and should be replaced. Several electrical panels located in the hallway were accessible. These panels must remain locked. A few electrical panels were obstructed by storage items. The exterior of the facility had some heavy staining and needed to be cleaned. This facility did not appear to be receiving adequate maintenance/upkeep on both the interior and exterior.

The current Comprehensive Educational Facility Plan (CEFP) indicated this building has 78 percent program utilization rate; the desired program utilization rate is 85 percent.

Beale Elementary School

This facility is located on five acres and meets the current West Virginia Board of Education acreage requirements. The oldest part of the facility was constructed in 1984 with a classroom addition in 1992. This facility was renovated again in 2010 through a West Virginia School Building Authority Needs Project Grant. The project included a new Heating Ventilation and Air Conditioning (HVAC) system, asbestos abatement, new

flooring, finishes, Americans with Disabilities Act (ADA) improvements, technology, and site improvements.

The HVAC system is new and meets the current ventilation standards. The interior air handler units did not have the thermal expansion valves insulated which resulted in condensation dripping on the floor. These valves needed to be insulated to prevent condensation. Two large condensing units were located at the back of the facility near the playground. These condensing units should be in a lockable fence enclosure. Some covers were missing on the junction boxes/street elbows that serve these condensing units. A back-up generator on-site was not in a secured enclosure. Classroom 136 did not have a return air connection which resulted in poor temperature and humidity control. This has a negative impact on the learning environment and needed to be resolved. Tree roots on one area of the sidewalk compromised the walking surface. The newly painted walls in this facility were beginning to peel. It did not appear that the wall surface had been properly prepared for painting. A few stained ceiling tiles existed throughout the facility. Electrical panels in the hallway were not properly secured; one panel was missing a safety blank. This issue was addressed during the walk-through. Some of the playground equipment did not have adequate safety material installed.

The current Comprehensive Educational Facility Plan (CEFP) indicated this building has 73 percent program utilization rate; the desired program utilization rate is 85 percent.

Hannan High School

This facility is located on 15 acres and meets the current West Virginia Board of Education acreage requirements. The oldest part of the facility was constructed in 1954 with additions and renovations in 1970, 1983, and 1985. This facility was renovated again in 2006 utilizing a West Virginia School Building Authority Need Project Grant. That project included a new Heating Ventilation and Air Conditioning (HVAC) system, asbestos abatement, new flooring finishes, ADA improvements, technology, and site improvements.

The Team observed some minor deficiencies noted during the walk-through. A downspout on the vocational agriculture building was disconnected. Several electrical panels in that area were obstructed and one mercury thermostat was in use. The rest room located nearest the vocational agriculture area did not have an operational exhaust fan. The electric room near the library did not have air conditioning/ventilation. The Heating Ventilation and Air Conditioning (HVAC) system equipment in this facility was part of the 2006 renovation. Ten plus years of life remain on the equipment. The filters were clean and had been recently replaced. These units needed a preventive maintenance visit. After the initial preventive maintenance visit, these units should be placed on a semi-annual routine maintenance schedule. The interior of this facility appeared clean and well maintained.

The current Comprehensive Educational Facility Plan (CEFP) indicated this building has 70 percent program utilization rate; the desired program utilization rate is 85 percent.

Leon Elementary School

This facility is located on 5 acres but does not meet the current West Virginia Board of Education acreage requirements. The oldest part of the facility was constructed in 1951 with additions and renovations in the 1980s and the 1990s.

Staff and visitor parking was insufficient with existing parking in a gravel lot. The library did not have computer work stations. There was no dedicated art room. A health services unit was not available. The multipurpose room serves as the gymnasium and cafeteria.

This school needed a Heating Ventilation and Air Conditioning (HVAC) system renovation. The facility lacked forced ventilation in the facility except the library and the two room addition that houses the pre-school. These areas have individual room thermostats with access to the fan controls. Fans in all spaces were in the auto position. The fans must be in the on position during occupied times to provide ventilation. A mercury based thermostat was in the gymnasium; all mercury containing devices are to be removed from the facility as they are considered hazardous. The facility lighting was a combination of T-12 fluorescents in hallways and classrooms, incandescent lights outside, and nickel metal halide lights in the multipurpose room. The lighting needed to be upgraded. The Team observed stained ceiling tiles throughout the facility. Tiles must be replaced within 48 hours of water infiltration to prevent mold growth. Prompt replacement of damaged ceiling tiles also allows for identification of new or worsening leaks.

The current Comprehensive Educational Facility Plan (CEFP) indicated this building has 81 percent program utilization rate; the desired program utilization rate is 85 percent.

New Haven Elementary School

The current Comprehensive Facility Plan (CEFP) for this facility did not include the acreage. The oldest part of this facility was constructed in 1952. Subsequent additions and renovations were completed in 1960, 1964, 1988, 1972, 2000, and 2006.

This school site does not meet the required acreage for an elementary school and is not large enough for future expansion. Staff and visitor parking was insufficient with existing parking in a gravel lot. The Art Room lacked a ceramic kiln and black out areas. Breaker covers were needed to protect the missing breakers in the electrical panels in the storage room near Room 136 and in the hallway beside Room 102. Outside lights were on, in several areas, at 11:00 a.m. Roof leaks had caused stained ceiling tiles in several areas of the facility. Long-term water infiltration in Room 102 resulted in efflorescence on the exterior wall. Many classrooms were empty, but classroom lights were on.

The current Comprehensive Educational Facility Plan (CEFP) indicated this building has 76 percent program utilization rate; the desired program utilization rate is 85 percent.

Point Pleasant Primary School

The school is located on two acres in a residential area and does not meet the current West Virginia Board of Education acreage requirements. The oldest part of the facility was constructed in 1956 with additions and renovations in 1984 and 2003.

There is no room for future expansion of the school. Parking for staff is limited and visitors are required to find street parking. There was no dedicated art or music space in the facility. The multipurpose room served as both the cafeteria and gymnasium, sometimes at the same time. This negatively affected the curriculum delivery. Rooftop units were used for classrooms without outside walls and unit ventilators were used for all other classrooms. The unit ventilators did not meet current ventilation requirements. The classrooms served by rooftop units had individual thermostats that allowed the occupants access to fan controls. The fans were in the auto position; they are required to be in the on position during occupied hours. An HVAC renovation is needed that will replace the unit ventilators and upgrade all controls to a building automation system. Stained ceiling tiles existed throughout the facility. Tiles must be replaced within 48 hours of water infiltration to prevent mold growth. Prompt replacement of damaged ceiling tiles also allows for identification of new or worsening leaks.

The current Comprehensive Educational Facility Plan (CEFP) indicated this building has 78 percent program utilization rate; the desired program utilization rate is 85 percent.

Point Pleasant Intermediate School

The current Comprehensive Educational Facility Plan (CEFP) did not include the site acreage for this facility. During the on-site review, it appeared that the site acreage was adequate. This facility was constructed in 2002.

Several areas in the facility had stained ceiling tiles due to roof leaks. Strobes and temperature sensors in the Multipurpose Room were not protected and one strobe was badly damaged. The Media Center door did not close and latch automatically and presented a security issue. Carbon dioxide levels in this facility were very low indicating over ventilation of the school facility. Humidity levels ranged from 65 percent rH to 75 percent rH. If the facility was in an economizer mode, this would explain the low carbon dioxide level; however, the building automation system resulted in unacceptable humidity levels in the spaces that can lead to mold growth. Verification of the operation of the building control system is needed.

The current Comprehensive Educational Facility Plan (CEFP) indicated this building has 86 percent program utilization rate; the desired program utilization rate is 85 percent.

Point Pleasant Junior/Senior High School

This facility is located on 23 acres and meets the current West Virginia Board of Education acreage requirements. This facility was renovated in 2006 utilizing a West Virginia School Building Authority Needs Project Grant. That project included a new Heating Ventilation and Air Conditioning (HVAC) system, asbestos abatement, new flooring, finishes, Americans with Disabilities Act (ADA) improvements, technology, and site improvements. Through this project, the Career Center, High School, and Middle School were consolidated into a single structure.

The HVAC system at this facility was not being properly maintained. Coils on the rooftop units were severely restricted. These units needed a preventive maintenance visit. Continued lack of maintenance on these units will have a drastic effect on equipment performance and shorten the expected life cycle of the equipment. The gas line located on the roof was rusty and needed to be painted. The exterior building doors needed weather stripping. An old chiller and dish located out back of the school that had been taken out of service needed to be removed from the site. Rest room stalls in the junior high school were missing doors. Stained tiles were prevalent throughout the facility. Several door signs (room numbers, etc.) were either partially or completely missing. The courtyard area needed to be landscaped. There had been past issues in which students broke floor tile in the commons area with the chairs. Electrical panels in the hallways that were student accessible were unsecured. The alternative learning center at this facility was located in portable units a good distance behind the school. The loading dock area for the auditorium was being utilized as a classroom. Lockers in the junior high school boys' locker room had been vandalized and damaged.

The current Comprehensive Educational Facility Plan (CEFP) indicated this building has 88 percent program utilization rate. The desired program utilization rate is 85 percent.

Wahama High School

This facility is located on 12 acres and does not meet the current West Virginia Board of Education acreage requirements. The oldest part of this facility was constructed in 1957 with subsequent renovations/additions in 1965, 1995, and 2007.

The health services area was not adequate in size at 142 ft². Roof leaks resulted in stained ceiling tiles in several areas of the facility. The Team found that active roof leaks existed in the hallway by Room 318 and in the gymnasium lobby. The building automation sensors needed to be protected with impact resistant covers in the auxiliary gymnasium. Classroom 215 reported that various electrical receptacles in the space had been inoperative for an extended period of time. Window treatments needed to be installed in classrooms exposed to solar heat gain.

The Heating Ventilation and Air Conditioning (HVAC) system for the original structure of this facility provided heating only or cooling only for the entire original structure. This system did not meet the requirements of Policy 6200 since the temperature in all classrooms cannot be independently controlled. Temperatures during this visit ranged

from 75 to 79 degrees in the spaces. The HVAC system also did not provide adequate outside air ventilation for the classrooms since the supply fan operated only on a call for heating or cooling. Carbon dioxide levels in the spaces ranged from 1200 ppm in spaces that had operable windows to 3300 ppm in classrooms that did not have operable windows.

The current Comprehensive Educational Facility Plan (CEFP) indicated this building has 65 percent program utilization rate; the desired program utilization rate is 85 percent.

County Board Office

The county board office was littered with stained tiles and the Team observed evidence of water infiltration in numerous areas. The water infiltration issues must be addressed and stained tiles must be replaced as they are encountered. The building appeared to be suffering from a lack of maintenance. This location had been retrofitted with some residential type heating/cooling systems.

Countywide Recommendations

1. Mason County was currently using a paper work order system. The system is antiquated, inefficient, and cumbersome for all the stakeholders. The Team recommended that Mason County implement a computerized maintenance, and preventive maintenance, and work order system.
2. The facilities in Mason County were not receiving adequate preventive maintenance. Many of the Heating Ventilation and Air Conditioning (HVAC) systems were in a deficient condition. Mason County must establish a county-wide documented preventive maintenance plan. The maintenance staff consisted of 10 workers and two working supervisors. Some of these staff members currently have duties beyond building maintenance. The Mason County Maintenance Director will need to evaluate the staff capabilities to determine if preventive maintenance can be accomplished internally. It may be necessary to explore contracting out some or all of the preventive maintenance activities.
3. There is an immediate need to address the mechanical systems at several facilities. Due to financial constraints the Team recommended that Mason County explore performance contracting opportunities that include replacing HVAC equipment, automation systems, and lighting.
4. The current director of maintenance has numerous professional assignments. The director's responsibilities included: Director and principal of the Mason County Career Center, maintenance director, policy development, service personnel director, etc. Due to the critical nature of the facility needs in Mason County, the Team recommended that Mason County explore establishing a position in which the primary focus is facility maintenance/operation.
5. The maintenance staff currently does not have the capabilities to access the building automation controls remotely from off site locations. This resulted in numerous inefficiencies in maintaining and troubleshooting equipment. Remote access is critical to the operation of these systems. The Mason County Maintenance Director needs to work with the instructional technology department to facilitate this type of remote access.
6. The Team recommended that mercury containing thermostats be removed from all facilities.

7.6. PERSONNEL.

7.6.1. Hiring. County boards follow hiring practices set forth in W.Va. Code. (W.Va. Code §§18A-4-7a, 18A-4-8, and 18-2E-3a)

The Team reported the following irregularities in hiring practices set forth in W.Va. Code. It is noted that these findings pre-dated the current county superintendent. At the time of the Education Performance Audit, the current superintendent had been employed two months.

1. Mason County Schools has several positions funded through a Save the Children grant. The immediate past superintendent signed a Partner Agreement to receive the \$107,428 grant, but it was never approved by the Mason County Board of Education. Multiple citings in the grant referred to persons hired as the “Grantee’s Employees”. The job descriptions were produced by Save the Children and unaltered by Mason County Schools. Mason County posted the positions, processed the applications, selected the successful applicants, and employed them at their board meetings. However, the employees in positions funded by the Save the Children grant are not considered professional or service personnel and do not appear on either seniority list.
2. A Mason County Schools Board Member was employed as a Junior High Volleyball Coach at Point Pleasant Junior Senior High School for the 2010-2011 season. The board member did abstain from hiring himself. Central office personnel reported that this individual is working as a volunteer, but there was no evidence available to support that assertion and no written agreement on hand that prevents him from collecting payment in the future.
3. Mason County Schools employed an individual into a long-term substitute position for theatre at Hannan Junior/Senior High School. This individual was not certified in any area, lacking even a substitute permit, which at the date of this audit was still listed by the West Virginia Department of Education (WVDE) as “substitute permit pending.” This individual does not possess certification, authorization, or permit which would allow the Mason County Board of Education to employ her as a professional employee. However, board employees noted she is being paid as a professional substitute and occasionally substitutes in other areas as well. Not only were hiring practices ignored, but someone had to authorize an arbitrary level of pay.
4. During the 2009-2010 school year, the Mason County Board of Education posted a Federal Programs Coordinator position. The posting required a masters degree in administration. Four applicants applied for the position, but only two applicants possessed a masters degree in administration. One of these two applicants withdrew her application for the position. However, the Mason County Board hired an individual who did not meet the qualifications of the posting (did not have a masters degree in administration). The applicant who met the qualifications of the posting grieved the decision, and through mediation another coordinator’s job was

created, posted, and awarded to the grievant. The Federal Programs Program Coordinator first hired is the new coordinator's immediate supervisor, but at the same pay grade. This seems inappropriate in hiring practices and for a county operating in a deficit.

Further raising the appearance of impropriety, an applicant was fully qualified and certified for the position of Federal Programs Coordinator but withdrew her application. Later that year this individual was hired as a principal, although she was not the most qualified candidate for the position. Therefore, it appeared there was a quid pro quo to the individual for pulling her grievance and there appeared to have been quid pro quo to the individual for withdrawing her application for this position.

5. Mason County Schools did not appear to use summer seniority for summer positions. They may have hired the correct person, but were unable to prove it with a summer seniority list for either professional or service personnel. When asked to produce a list of professional personnel summer seniority, a document was distributed which contained the applicants for several positions, many of whom were substitute permit personnel.
6. During the 2010-2011 school year, the Mason County Board of Education posted for a special education teacher at Point Pleasant Junior/Senior High School certified in LD/MI/BD plus autism. None of the applicants was fully certified for the position. An applicant held a social studies certification and had completed six hours in special education. Another applicant held no teaching certification, had only a long term substitute permit and had taken twelve hours in special education. The Mason County Board of Education had the options of hiring no one and reposting or hiring a certified teacher and seeking a permit or alternate route. However, they chose to hire the individual who has no certification in any teaching area.
7. Other inappropriate hiring practices seemed to appear after the Team reviewed numerous positions and the documentation behind each.
 - a. When asked if a person with a substitute permit would ever be hired into a position, the answer was "yes, if no certified person applies."
 - b. When asked if applicants from Mason County are given an automatic preference even if qualified applicants are available from outside the county, the answer was "yes, if an adequate pool of applicants are available from within the county."
8. During the summer of 2010, a vacancy was posted for the position of Principal of Point Pleasant Intermediate School. Multiple applicants met the criteria, interviews were held and the interview team selected an applicant outside of Mason County Schools with previous experience as an administrator. This applicant scored 40 percent higher on the seven point hiring criteria, including a significant superiority over the other applicants in the interview section, and was recommended for the position. However, the Mason County Board of Education clearly refused to act on

the recommendation. Subsequent to their refusal, the county superintendent submitted the name of his daughter, who was approved by the Mason County Board of Education. This action reinforced the appearance that the administration and Board of Education hires the person they want, regardless of qualifications, experience, certification and recommendations of their own interview teams and superintendent.

9. On July 27, 2010, the Mason County Board of Education hired a former board member as the Athletic Director at Wahama High School. The fact that he was a former board member did not disqualify him from being hired. However, according to Mason County personnel records, this individual did not hold certification, a degree, or even a permit. The only item in his personnel file was an expired West Virginia Secondary Schools Athletic Association (WVSSAC) coaching permit. Regardless, this individual who did not hold authorization for the position was hired as athletic director and, according to the financial department, is paid as a professional educator with a B.A. degree and no years experience. Not only were hiring guidelines ignored, but someone had to authorize an arbitrary level of pay.

The Team observed the following discrepancies in postings.

1. The position of Athletic Director was posted in error as a service personnel vacancy on Wednesday, July 7, 2010. Mason County Schools issued a revised posting of professional vacancies on Thursday, July 8, 2010 listing the Athletic Director position as a professional vacancy, but did not extend the posting an extra day to make it a minimal five day posting as a professional vacancy.
2. The position of Athletic Assistant was reported to be an unpaid position, but postings for Athletic Assistant did not indicate it was for no pay. In addition, a job description for Athletic Assistant was not attached to the postings.
3. The following job postings did not have job descriptions attached: 502-024-S/Athletic Assistant, 503-226-S/Athletic Assistant, 502-016-S/Assistant Volleyball Coach, 501-161-S/Athletic Assistant, 014-169-C/Bus 911, 001-108/School Site Manager, 213-515-C/Cook,
4. Job 503-740-P is listed on the professional vacancies for July 30-August 6 as LMDSSM. The job description also lists the position as LMDSSM. Prospective applicants might have difficulty determining that it was a position as a multi-categorical special education teacher responsible for social studies and math. The job description requires special education certification but does not mention social studies or math.
5. Service personnel postings were listed as requiring a high school diploma with no reference to accepting alternate certifications such as Graduate Equivalency Diploma (GED).

Summary-Hiring Practices

The Team concluded that personnel files were cumbersome to locate and review efficiently because of the personnel office organizational system. Vacancy postings and accompanying job descriptions were filed by the Mason County Board of Education approval hiring date. All professional personnel, service personnel, and extra-curricular postings were filed together according to the date of the board meeting they were approved.

The Team randomly selected and reviewed 55 job postings. The discrepancies listed in this report are only those which were revealed in this limited number of postings that the Team was able to review due to time consumed to locate information. When asked to produce an individual posting or applications for an individual posting, the office staff first had to determine the board meeting date the person was employed. The Mason County staff was cooperative, but information was filed in such a manner as to make reviewing the documentation extremely difficult.

Despite indicating that cooks, custodians, and aides were hired for summer positions, the personnel office could not produce a summer seniority list for cooks, custodians, or aides. When asked how it was determined who was awarded a particular professional or service personnel summer position, the explanation was to see who applied, then to count the number of previous summer contracts in the folder of each applicant. It appears a summer seniority list for professional and service personnel would be beneficial to applicants and personnel processing the applications.

The Mason County School District employs 13 professional employees on permit and has 19 persons employed as long-term substitute teachers. Of the 32 employees either working on permit or as a long-term substitute teacher, 18 of those are in special education. Six special education positions at Point Pleasant Junior/Senior High School are filled by individuals either on permit or as a long-term substitute teacher.

Generally, Mason County Schools appears to be following most basic hiring guidelines - posting positions at all locations, providing seniority lists at all locations and using the seven criteria for determining professional hires. However, the Team found individual cases in which some of the guidelines were ignored so particular individuals could be hired whether or not that individual was the most qualified or even certified at all.

There appears to be an excessive reliance on uncertified substitute teachers (long or short-term substitute permits approved through RESA). Mason County Schools has a substitute bank of 162 substitute teachers, 61 of whom are on either a long or short-term substitute permit. Mason County Schools uses an automated call out system for substitute teachers, which does not show a preference for certified substitute teachers over those with a permit.

Commendation

The Team reviewing personnel commended the secretarial staff at the Mason County Board of Education Central Office. Without their insight and guidance, the Team would not have been able to maneuver through the current filing system.

7.6.2. Licensure. Professional educators and other professional employees required to be licensed under West Virginia Board of Education policy are licensed for their assignments including employees engaged in extracurricular activities. (W.Va. Code §18A-3-2; Policy 5202)

The Team reported the following violations of (W.Va. Code §18A-3-2 and West Virginia Board of Education (WVBE) Policy 5202). The first chart explains the certification issues the Team observed through a detailed review of the certified list, WVEIS Master Course Schedule, and the West Virginia Department of Education (WVDE) Certification Database.

Chart 21
Mason County- October 25-28, 2010 (Final Report)

County-School	Educator Name	Courses/Content Teaching	Certification/Status	Findings	Recommendations
049-216	Educator	2610 Preschool	Renewal Pending of Teaching Certificate	Teaching certificate does not cover preschool	No application submitted to renew Preschool Out-of-field or First-Class/Full-Time Permit.
049-201	KITT- Interventionist	N/A	N/A	Identified as interventionist, but not coded 8060	Teacher currently in position is not identified and certification and HQT cannot be determined.
049-501	Educator	7661V Test Strategies	OK	Test Strategies is not usually a virtual course	V code may be incorrect
	Educator	7605-J 7606-I 7606-U	Multi-Cat application pending	Application is not complete and cannot be processed, needs to renew First-Class/Full-Time Permit for the current school year (semester).	Correct application not currently on file.

	TBA Theatre	Unknown	N/A	Cannot determine if a substitute is currently in the position	Please identify teacher of record or remove from master schedule
	TBA Math	Unknown	N/A	Cannot determine if a substitute is currently in the position.	Please identify teacher of record or remove from master schedule.
049-206	Educator	8017-T Col-Tch Multi-Cat	Multi-Subjects K-8	Not certified for Multi-Cat. If not a sub, but hired, needs Form 1.	Form 1 currently pending for Early Education, area for which the teacher is NOT assigned. Correct coding or rescind recommendation.
	Educator	2625-T Self Contained Multi-Cat	Pre-K Education B-PK	Not certified for Multi-Cat. If not a sub, but hired, needs Form 1.	No waiver or application pending
049-210	Educator	8017-T Col-Tch Multi-Cat	Math thru Alg. I 5-9 Elem K-6	Not certified for Multi-Cat. If not a sub, but hired, needs Form 1.	No waiver or application pending.
	Educator	8043 Speech Therapist	Long-Term Substitute English and Social Studies	Not certified	No application or waiver pending.
	Special Ed. Vacancy	26300T	N/A	Cannot determine if a substitute is currently in the position.	Please identify teacher of record or remove from master schedule.
049-502	Educator	8044 Speech Assistant	Long-Term Substitute English and Social Studies	Not certified.	No application or waiver pending.
	Educator	401230 410930	College Agreement	College agreement only verifies eligibility to teach 4012.	Not eligible to teach 4109, please remove Course 4012 should reflect a X in the 6 th position.
	Educator	Z coded Alternative Courses	Long-Term Substitute Permit	Not eligible to teach alternative, but has a waiver pending.	Uncertain of waiver status and whether it will be granted.

	Educator	Z coded Alternative Courses	Long-Term Substitute Permit	Not eligible to teach alternative, but has a waiver pending.	Uncertain of waiver status and whether it will be granted.
	Educator	Z coded Alternative Courses	Long-Term Substitute Permit	Not eligible to teach alternative, and has no waiver pending.	No waiver on file.
	Educator	Z coded Alternative Courses	Elem 1-6 MR SLD	Must hold alternative education authorization to teach Z coded courses.	No application on file.
	Educator	4831- Asst. Rdg. Grades 9 and 7 8060 Interventionist	OK	Interventionist is not usually a teacher of record.	Please verify if this is a half-time position.
	Educator	Z coded Alternative Courses	Driver's Ed. Health PE	Must hold alternative education authorization to teach Z coded courses.	No application on file.
	Educator	7606-J	Long-term Substitute Math, Elementary	Long-term sub, sped not covered, check for waiver. If hired for position needs Form 1.	No waiver and no pending application.
	Educator	All courses coded Z for Alternative	First-Class/Full- Time Permit Multi- Cat 5-Adult Alternative Education Authorization Elementary K-6	Why on permit if not scheduled as a special education teacher.	Correct code or rescind recommendation to hold permit.
	Educator	4009-B 4009-R 4012-R 8017-R	Early Child. Early Education Reading	Not certified, if a sub need a waiver, or if hired, need a Form 1.	No waiver or application pending.

	Educator	All courses coded Z for Alternative	NONE Alt. Ed. Auth Pending & First- Class/Full-Time Permit pending	Why on permit if not scheduled as a special education teacher.	Correct code or rescind recommendation to hold permit. No waiver on file for Form 38.
049-218	Educator	4809 Title I Reading	Elem K-6 SLD	Not certified	Would need to apply on Form 1, but no application pending.
049-217	EES	Unknown	Unknown	Cannot determine if there is a certification issue.	Cannot make recommendation until teacher a courses are identified.
049-503	NO Name	305130 Alg. III 601110 PHYSICI 9 701010 World 7677 Coll. 101	Unknown	Cannot determine if there is a certification issue.	Cannot make recommendation until teacher a courses are identified.
	Educator	4109 7321	College Verified	College agreement does not permit teaching of 4109 (Eng).	Please correct code or apply on Form 1, no application pending Course 7321 should be coded with a X.
	Educator	0721 6013	College verified	College agreement does not permit teaching 6013.	Code 0721 with a X in the 6 th position. Not certified or eligible to teach 6013.
	Educator	Courses noted Alt. Ed (Z), but not coded as such	NONE Applications pending for a First- Class/Full-Time Permit and Alt. Ed. Authorization	Not eligible for alt. ed. and no waiver requested. Why application for permit if not assigned to any additional courses?	No waiver for Alt. Ed. If not employed/assigned to additional courses, rescind rec. for Permit.
	Educator	4011 6021 6201 7011	Alt. Ed. Authorization	Ok if courses reflected Z code in 6 th position.	Correct coding to verify Alt. Ed.

	Educator	3041 7031	First-Class/Full-Time Permit Multi-Cat 5-Adult Alternative Education Authorization Elementary K-6	Why on permit if not scheduled as a special education teacher Courses at this school noted as Alt. Ed., but not coded with a Z.	Correct code or rescind recommendation to hold permit.
	Educator	6909 Health	Librarian Elem 1-8	Not certified for Health.	Correct course code or apply on Form 1 or Waiver.
	Educator	8017-	Long-Term Substitute Business, Math and Elem.	Not covered for Spec. Ed. Courses, request a waiver.	8017 should reflect a 6 th position exceptionality or correct code. No waiver on file to cover for Spec. Ed.
	Educator	1411 4009 5661 6007-R 6011-R 6909 7007-R 7010 7031-R 7653-R8017-B	Long-Term Substitute Eng., Biology, Chemistry, Gen. Sci. and Elem.	Not covered for Spec. Ed. Courses, request a waiver.	No waiver on file to cover for Spec. Ed. Some classes special ed. Others not, please check coding.
	Educator	4013	Verified by college	College Agreement.	Course code must reflect a X in the 6 th position.
Additional employees not on Master Schedules	Educator	Employed as a Speech Assistant	Not certified, Paid by Staffing Firm	Should apply for Speech Assistant.	No application pending.
	Educator	Employed as a Speech Assistant	Not certified, Paid by Staffing Firm	Should apply for Speech Assistant.	No application pending.
	Educator	Employed as a Speech Assistant	Not certified, Paid by Staffing Firm	Should apply for Speech Assistant.	No application pending.

Additional Concerns

1. Individuals employed as part of the Save the Children Grant on extracurricular contracts should be employed on contract (specifically the ones who are almost full-time). Schools and positions are provided below.

Point Pleasant Primary School

- Early Childhood Coordinator- Vacant as of audit, must verify minimum of passing WV State Aid Test
- Literacy Coordinator- Vacant as of Audit, must verify minimum of professional teaching credential in elementary education.
- NuPA- Requires West Virginia elementary teaching certification. The position is currently held by the counselor who does not meet requirements for employment or highly qualified teacher (HQT).

Beale Elementary

- Early Childhood Coordinator as of Audit, must verify minimum of passing West Virginia State Aid Test.
- Literacy Coordinator - Vacant as of Audit, must verify minimum professional teaching credential in elementary education.
- Literacy Assistant as of Audit, must verify minimum of passing West Virginia State Aid Test.
- NuPA- Requires WV Elementary Teaching certification. Currently held by an individual, certified in health, physical education and social studies and does not meet requirements for employment or highly qualified teacher (HQT).

Ashton Elementary

- Early Childhood Coordinator- Vacant as of November 1, 2010, must verify minimum of passing WV State Aid Test
 - Literacy Coordinator- as of November 1, 2010, must verify Professional Teaching Credential in Elem. (the West Virginia Department of Education, Office of Profession Education could not locate a certification for this person).
 - Literacy Assistant- as of Audit, must verify minimum of passing WV State Aid Test.
 - NuPA- Requires WV Elementary Teaching certification. Currently held by an individual, certified in counseling and does not meet requirements for employment or highly qualified teacher (HQT).
2. Many positions were filled with long-term substitutes. Many substitutes did not have pending waiver requests. This was a problem last year in Mason County.
 3. Several applicants hold First-Class/Full-Time Permits, but are not scheduled/assigned to classes within the content/endorsement area. If not

employed in position, must request recall. This also creates issues with tuition reimbursement.

4. Many alternative education teachers who have been employed only hold substitute and First-Class/Full-Time Permits, which require a waiver. Mason County may not be able to continue to get these waivers in the future.
5. The Coaching Database was not up to date.

Mason County Central Office Concerns

1. Several director managers (Position code 106) were identified as teaching alternative education. The position code needed to be examined to determine if it should be 107.
2. Food Service Supervisor, did not hold a Director of Food Service Authorization.
3. Chief School Business Officer, holds permanent authorization for School Nutrition, and has a pending application for Chief School Business Officer, a waiver request is pending; however the **waiver may be denied**.

Recommendations

The Team recommended that the director of personnel work with the West Virginia Department of Education, Office of Professional Preparation, to correct personnel findings of concern. Specific findings of concern remain and the WVDE, Office of Professional Preparation, staff has developed a list specific to each county school.

7.6.3. Evaluation. The county board adopts and implements an evaluation policy for professional and service personnel that is in accordance with W.Va. Code, West Virginia Board of Education policy, and county policy. (W.Va. Code §18A-2-12; Policy 5310; Policy 5314)

The Team reviewed the teacher seniority list to determine teachers with 0-3 years or 4-5 years experience for required observations/evaluations. A substantial sampling (25 percent) of personnel files for those teachers with 0-5 years experience was reviewed to determine that personnel had received the appropriate evaluations in a timely manner.

The Team also reviewed personnel evaluations for administrators, support personnel, service personnel, coaches, etc., to determine that the evaluation process was conducted according to W.Va. Code §18A-2-12, West Virginia Board of Education Policy 5310, and county policy.

Note: All evaluations reviewed were for the 2009-2010 year as the evaluations for the 2010-2011 year were not yet available. The Mason County Board of Education policy in effect during the 2009-2010 school year was used to evaluate service personnel evaluations which had been revised for the current 2010-2011 school year.

A random review of professional evaluations disclosed the following.

1. Four teachers (Wahama High School; Wahama High School; Point Pleasant Junior/Senior High School; and Point Pleasant Intermediate School) who were within their first three years of employment had only one evaluation. Mason County Board of Education Policy 810 and West Virginia Board of Education (WVBE) Policy 5310 require that teachers with less than four years of teaching experience be evaluated two times a year.
2. One teacher (Point Pleasant Primary School) received the first evaluation observation on 4/22/2010. This did not meet the requirements of WVBE Policy 5310 that the first evaluation observation occur on or before November 1.
3. One teacher's (Leon Elementary School) evaluation dated 4/20/2010 was not signed by the evaluator as required by WVBE Policy 5310.

A random review of administrators' evaluations disclosed the following.

The record keeping on administrator evaluations made it difficult to verify the mid-year reviews and end of year conferences and evaluation statements. A review of some administrators' portfolios showed the goals had been established and good portfolio records had been kept to verify the completion of the goals. However, the record keeping at the county office needed to be improved.

A random review of support personnel evaluations disclosed the following.

1. Three professional support personnel, an athletic trainer and two speech therapists (athletic trainer at Point Pleasant Junior/Senior High School, speech therapists), were evaluated using the teacher evaluation forms and process rather than the Professional Growth and Development Plan forms and process for evaluating professional support personnel. This does not conform to the requirements of Policy 5310.
2. One speech therapist was last evaluated in the 2005-2006 school year. This did not meet the requirement of Policy 5310 that professional support personnel with more than five years of experience be evaluated at least every three years.
3. One speech therapist was last evaluated in the 2003-2004 school year. This did not meet the requirement of Policy 5310 that professional support personnel with more than five years of experience be evaluated at least every three years.

4. One speech therapist who was a first year employee in the 2009-2010 year was not evaluated. Policy 5310 requires first year employees be evaluated at least two times.

A random review of coaches' evaluations disclosed the following.

The Team reviewed evaluations for coaches of various sports in all three high schools. All evaluations reviewed complied with Mason County Board of Education Policy 810 and WVBE Policy 5310.

A random review of service personnel evaluations disclosed the following.

1. One accountant (central office), one cook (Point Pleasant Junior/Senior High School), one custodian (Point Pleasant Junior/Senior High School), and one secretary (Point Pleasant Intermediate School) who were all probationary employees received only one evaluation during the 2009-2010 year. This did not meet the requirement of Mason County Board of Education Policy 810 that all probationary service personnel "receive a formal written evaluation at least twice yearly".
2. One first year secretary (Mason County Central Office) was not evaluated during the 2009-2010 year. This did not meet the requirement of Mason County Board of Education Policy 810 that all probationary service personnel "receive a formal written evaluation at least twice yearly".
3. The Team reviewed several maintenance employees' evaluation files. The file of one maintenance employee employed in 2007-2008 had no evaluations. Two maintenance department employees were last evaluated in the 2004-2005 school year. The current maintenance director reported to the Team that she has looked for maintenance employees' evaluations and has been unable to find them. Discussion with the maintenance employees led her to believe evaluations for them had not been completed during the 2009-2010 year.
4. One mechanic, a probationary service employee, had only one evaluation in 2009-2010. Mason County Board of Education Policy 810 requires all probationary employees to be evaluated at least twice yearly.

The county school directory for the 2010-2011 school year was not up-to-date with the current assignments of personnel. The Team recommended that the county school directory be reviewed and updated to show current, accurate information on personnel.

7.7. SAFE, DRUG FREE, VIOLENCE FREE, AND DISCIPLINED SCHOOLS.

7.7.2. Policy implementation. The county and schools implement: a policy governing disciplinary procedures; a policy for grading consistent with student confidentiality; policies governing student due process rights and nondiscrimination; the Student Code of Conduct policy; the Racial, Sexual, Religious/Ethnic Harassment, and Violence policy; an approved policy on tobacco use; an approved policy on substance abuse; and an approved policy on AIDS Education. (W.Va. Code §18A-5-1 and §18-8-8; Policy 2421; Policy 2422.4; Policy 2422.5; Policy 4373; Policy 2515)

W.Va. Code §18A-1-12a (17) states, “All official and enforceable personnel policies of a county board must be written and made available to its employees.”

1. Mason County Schools began a complete revision of its policy manual in the summer 2009 when NEOLA was contracted to develop a new policy manual. In a September Mason County Board of Education meeting, the previous policy manual was rescinded and the NEOLA policy manual was adopted. The procedures leading to the adoption of the new policy manual included an individual policy submitted by NEOLA, reviewed by a county committee for suggestions, and then returned to NEOLA. After a yearlong review of the policies submitted for review, the current policy manual was developed. It appears that a generic policy was developed for any reference to a State Board policy and/or West Virginia Code. As a result, the county policy committee chairperson indicated that the manual contained approximately 300 **new** policies. This is a massive policy manual and appears to overwhelm the users. Although a “search button” does help navigate the policy manual, the way the information is organized results in the policy manual being cumbersome to access all the policies pertaining to an issue. Additionally, many of the policies were incomplete as to providing all the information that needs to be considered when implementing a policy.
2. An example is the Student Code of Conduct. Mason County Board of Education Policy 5500 repeats a portion of West Virginia Board of Education (WVBE) Policy 4373; but, to view the various levels of violations and consequences found in WVBE Policy 4373, one must also access Policy 5600, *Student Discipline*. Having all this information in one policy would give a review of all the information needed without having to complete multiple searches.
3. A second example is the evaluation policies. Mason County Board of Education Policy 3220, *Staff Evaluation*, refers to evaluating professional personnel but the policy does not include the criteria for who should be evaluated and the timelines that must be met. This could be confusing for a new administrator. Unless the administrator consulted WVBE Policy 5310, important timelines could be missed and evaluations negated.

4. A third example of an incomplete policy is Mason County Board of Education Policy 5421, *Grading*. The various grading scales were outlined; however, specific advanced high school courses available to students were not listed anywhere in the policy. It would be obvious that the advanced placement and/or International Baccalaureate (IB) courses would carry the appropriate designation and would not need to be listed; however, from looking solely at Policy 5421, a parent would not have any idea whether or not a course their child is taking qualifies as a weighted class. The grading scale for advanced classes reflects that the scale is for courses “listed above” but no courses are listed anywhere in the policy.
5. Another issue with the search button is that not all topics relating to an issue are displayed with the search. An example is the word, “evaluation”. When a search is conducted the evaluation process for administrators is not displayed. One must be specific and search for “administrator evaluation” which adds another layer of search to the process. Organizing the manual in this manner seems to add additional layers of searching and should be corrected for simplicity. Although initial training was provided to staff members, additional training is needed for administrators to be comfortable with knowing what policies are in the manual and how to access all pertinent policies that may apply to an issue. Reliance on the search button will not always provide essential information. The policy manual is available online for anyone to peruse.
6. What seem to be missing was the administrative guidelines for implementing the generic policies. In order to make the NEOLA policies pertinent to Mason County, the county policy committee is developing administrative practices or guidelines to follow when implementing the policies. Otherwise, the new policy manual is nothing more than a compilation of specific West Virginia Codes and State Board of Education policies. Developing these guidelines will be another massive undertaking and will most likely result in one to two years or longer to complete. Until these practices are developed, inconsistency in the implementation of the policies is a concern. The Mason County Board of Education schedules a monthly meeting to review policies with the committees and appears to have made this a priority.

The Team offered the following recommendations regarding county policies.

1. Provide additional training for administrators and all staff members.
2. Add a severability clause to each policy. If an issue arises with one portion of a policy, the entire policy would have to be changed.
3. Post an adoption and revision date on each policy. The cover page of the policy manual indicated an original adoption date, but as policies are revised the revision date should be reflected on the policy.

4. Ask NEOLA to link all policies that pertain to a specific issue. This would allow the administrators to read all applicable policies within a single search.
5. Consider prioritizing policies for which guidelines and/or administrative practices are developed. It would seem policies that administrators are most likely to utilize in the day to day operation of the school would be initial ones developed.

Summary Policies

The Mason County Board of Education has undertaken a much needed policy revision project. However, as the process evolves the county school system is operating in a policy void by attempting to implement the NEOLA policies, as no administrative guidelines exist. The Team recommended that policies the school administrators and/or county personnel encounter daily be the first to have guidelines developed.

7.8. LEADERSHIP.

7.8.1. Leadership. Leadership at the school district, school, and classroom levels is demonstrated by vision, school culture and instruction, management and environment, community, and professionalism. (Policy 5500.03)

W.Va. Code §18A-2-12a (1) provides “The effective and efficient operation of the public schools depends upon the development of harmonious and cooperative relationships between county boards and school personnel.”

The Team interviewed the County Superintendent of the Mason County Board of Education, the Mason County Board of Education President, and all members of the board. The Team found that the county board and the superintendent operated in a harmonious and cooperative relationship. The current superintendent was appointed unanimously in mid August 2010 and had only been serving in that capacity for two months. This report presents numerous problematic issues; however, the Team found the issues to have been prior to the current superintendent’s term. The board of education members recognized some of the issues presented in this report and seemed to be united in resolving the issues and supporting the superintendent in her efforts to correct problems and bring a renewed focus to curriculum and instruction.

Board of Education Minutes

1. The Team found that Mason County Board meeting minutes were missing for the following years: 1998-1999; 1999-2000; 2000-2001; 2001-2002; 2002-2003; 2003-2004; and 2004-2005. The *Records Retention Schedule for the Financial Records of the Public Schools in the State of West Virginia*, January 19, 2003, Section E. Legal Documents: 1. Board Minutes states “Permanent” as the retention period for board of education minutes. The Mason County Board of Education Minutes and Agendas were not available for the years listed.
2. Minutes of the Mason County Board of Education for the 2005-2006, 2006-2007, 2007-2008 school years were posted on the county’s website. The 2008-2009 and 2009-2010 board minutes were located by county staff and were stacked in a pile, in order, along with superintendent’s notes stacked in order. These “loose” paper copies were not collated into an official binder. Additionally, the minutes were not signed by the superintendents serving during those years. Some minutes contained the signature of the Mason County Board of Education President, but many did not contain the board president’s signature.
3. The Team reviewed prior board meeting minutes (2008-2009 and 2008-2010) that contained hand written revisions. These were considered the official minutes and were sloppy and improperly maintained (Minutes No. 34 February 23, 2010 and Minutes No. 52 June 15, 2010).

4. The minutes for July 2010 to the present were in a three ring binder provided to the OEPA Team. Signatures of the county superintendent and board president were not available because the county was using an electronic format "Board Docs" as an official record of board meetings. The Team recommended that the county superintendent maintain an original "paper" document that is placed in a book similar to the minutes before 1998-1999.

W.Va. Code §18-5-25. Duties of superintendents as secretary of board states, "The county superintendent as secretary shall . . . (2) Attend all board meetings and record its official proceedings in a book for that purpose". The function was either not performed for the years in question or the minutes have been destroyed/misplaced/ stolen.

Board Leadership

1. Three Board of Education members traveled to a National Conference, *SREB High Schools That Work*, that was approved in Board Minutes on April 29, 2009 which listed the trip was to be paid by Title II funds. The vote was 2-0-3 with the three board members abstaining. The Team questioned the legality of financing the trip using Title II federal funds as well as the benefit to Mason County for three board members to attend this meeting.
2. Board Minutes No. 11, September 29, 2010 contained letters attached to the minutes from Student Expulsions that should not be public.
3. A Student Expulsion was made public in the Mason County Board of Education Minutes (Minutes No. 29, January 27, 2010).
4. Minutes showed that current board members abstained from personnel and financial items that involved family members or themselves. However, they did not leave the room during the vote as required by legislation passed in 2009.
5. The personnel section of this report details previous questionable hiring practices. The Mason County board of Education will need to build public and employee trust and confidence by adhering to W.Va. Code and West Virginia Board of Education policies on personnel.

Recommendations

1. The minutes and agendas of the Board of Education meetings are public documents. The Team recommended that the county superintendent notify authorities and an investigation be initiated on any missing minutes and agendas of the Mason County Board of Education. Update: the county superintendent indicated that the West Virginia State Police were notified November 2, 2010.

2. The superintendent should keep a hard copy of minutes on file in the central office with signatures by the superintendent and board president that document final approval. Additionally, professionally maintained copies of minutes should also be posted to designated areas (Schools, Bus Garages, Central Office, Web Page, etc.).
3. Final approval of board minutes must be reviewed by the superintendent and the members of the Mason County Board of Education to assure student confidentiality. A review of the board minutes contained a student's name that was expelled from school.

Additional Concern

Central office staff reported that a computer used by a former superintendent's secretary was missing. Additionally staff indicated furniture was missing from a former superintendent's office and the office of the superintendent's secretary. The Team strongly recommends that the county office and records be secured and monitors or devices be installed that record persons entering the county board office.

8.1. INDICATORS OF EFFICIENCY.

8.1.1. Curriculum. The school district and school conduct an annual curriculum audit regarding student curricular requests and overall school curriculum needs, including distance learning in combination with accessible and available resources.

1. When the Team interviewed a county level director, the question was asked, "To what can you attribute the achievement gap in your special education subgroup and general education subgroup?" The response was, there are "weak teachers in special education" and that they were trying to address the situation. However, a Team member reviewed the personnel files and all 22 evaluations of special education personnel conducted during the 2009-2010 school year did not reflect this. All special education teachers had a general overall rating of at least MEETS, with eight (8) of them receiving some EXCEEDS, and three of them getting all or nearly all EXCEEDS. There was not a single item on any of the 22 evaluations marked UNSATISFACTORY. Additionally, comments on the vast majority were minimal, with little if any suggestions for improvement. Many of the comments were restatements of the indicator. Additionally, the high number of special educators on permit or full time substitute permits could negatively affect the quality of instruction being delivered to students in this subgroup. Collaborative teaching is currently in place (except Behavior Disorder classrooms). While teachers have had professional development on co-teaching strategies, the high turnover rate is an issue for maintaining that all special educators receive the appropriate training.

The Team feels that an immediate plan of action needs to address the quality of instruction being delivered to all students, specifically the students in the special education subgroup.

2. The Team found through interviews with central office personnel that the Response to Intervention (RtI) process was not being implemented successfully in all schools countywide. Initially, teachers were pulling students out of class for Tier 1 instruction. As of the 2010-2011 school year, they were only pulling out as needed for Tier 2 and always for Tier 3 interventions. Secondary schools were using READ 180 for interventions in Tiers 2 and 3 while the Title I teachers provided interventions in elementary schools. The Team feels there is still a need for professional development to ensure teachers fully understand the RtI process.

8.1.3. Facilities. Schools are operated efficiently, economically, and without waste or duplication, and the number and location of schools efficiently serves the student population. (W. Va. Code §18-9D-15 and §18-9D-16 (d))

The number of Mason County schools has declined from 15 schools in 1998-1999 to 11 schools in 2010-2011. The county has undertaken an ambitious construction program that has resulted in several new facilities and upgrades to others. Some issues are presented under the regulatory agency section of this report that need maintenance attention.

8.1.4. Administrative practices. The school district assesses the assignment of administrative personnel to determine the degree managerial/administrative services provided schools establish and support high quality curriculum and instructional services.

1. Multiple professional personnel, four located at the central office and one director located at the Career Technical Center were assigned to curriculum. The central office personnel were relatively new to these curriculum positions. The Team observed a unified effort to improve curriculum and instruction in Mason County Schools. In just this short period of time, plans for implementation have been developed and introduced. It is the Team's recommendation that the plans continue to be followed.
2. The Team discovered through a review of evaluations of personnel that a high school principal was identified as not using Acuity during the 2009-2010 year. The central office curriculum staff needed to monitor the school for this practice specified in the evaluation.
3. Some personnel had been assigned positions who did not hold credentials or have experience in these positions. Therefore, it is difficult for the central office to operate efficiently and effectively in providing services to schools. The Director of Technology/Curriculum lacks credentials and experience in curriculum. The Special Education Director has credentials as a psychologist. Three coordinators of federal programs are in place. The Director of Maintenance is also the Director of the Mason County Career Center and serves in multiple other capacities. An assistant superintendent is assigned to personnel. The office of Education Performance Audits recommended that the county superintendent analyze the central office staffing and **a.** Assure staff are licensed for their assignments; **b.** assure federal program staff are paid from appropriate accounts and; **c.** reorganize and restructure the central office staff for effectiveness and efficiency.

8.1.6. Regional Education Service Agency. The school district effectively utilizes Regional Education Service Agency programs and services or other regional services that may be initiated between and among county boards.

1. While the central office maintained a listing of services provided by RESA 2, the central office staff members interviewed indicated they do not take full advantage of these services for numerous reasons. First, county office staff said the proximity of the RESA 2 to Mason County was an issue. Secondly, county staff indicated the perception that the central office does not want teachers to be out of the classroom. Additionally, staff reported that substitute teachers were “not available” as frequently as needed. The Team determined that 162 substitutes were employed in Mason County. Out of these, 61 were not fully certified teachers and are short or long term substitutes. There was no system used to identify which teachers are certified when called to substitute for classroom teachers. However, an electronic system is available to the county that enables professional substitutes for a given endorsement to be tied directly to a substitute call system. Interviews with central office staff indicated the system did not function in this capacity at this time.
2. While RESA 2 has been utilized for professional development sessions, the amount of time allocated for the content of each session concerned the Team. Of note, only nine teachers attended the professional development session conducted August 18, 2010 (8:00-10:45 a.m.) on “Deconstruction of CSOs”; five teachers attended from 1-4 p.m. The Team feels there was not sufficient time for the participants to reach the depth of understanding necessary to grasp the concepts involved with the deconstruction process.

CAPACITY BUILDING

18.1. Capacity building is a process for targeting resources strategically to improve the teaching and learning process. School and county electronic strategic improvement plan development is intended, in part, to provide mechanisms to target resources strategically to the teaching and learning process to improve student, school, and school system performance.

The Team interviewed central office curriculum staff and reported it was evident that the new superintendent had a plan in place to build capacity in Mason County Schools. Recent turnover has resulted in a new central office staff in the area of curriculum. This relatively new staff has demonstrated a strong desire to improve the quality of education through curriculum design and instructional practices. Previous practices have been reviewed and were being revised to reflect West Virginia Board of Education Policy 2510 and Policy 2520. The creation of a course handbook has provided a tangible tool for students, teachers, counselors, and administrators. Additionally, the move to a standards-based report card in Kindergarten has been well received by faculty and parents. Mason County plans to utilize standards-based report cards for additional programmatic levels in a phased process.

Of note, West Virginia Board of Education Policy 2512, *Instructional Supports for Third and Eighth Grade Students to Achieve Critical Skills*, Critical Skills funds were used to implement a summer academy for students targeted for reading and math intervention. The use of SuccessMaker (Pearson Education) resulted in substantial student growth in reading and mathematics skills. The system provides reports for teachers and central office staff to monitor student progress on a daily basis. Reports provided to the Education Performance Audit Team indicated some students increased by a grade level in as little as six weeks. This was also being used with English as a Second Language (ESL) students with measurable success. As a result of the success during the summer program, SuccessMaker was being implemented in grades K-8 during the current school year (2010-2011). Staff indicated their anticipation of using Critical Skills to purchase additional licenses for students identified in Grades 3 and 8.

While Mason County did not participate in West Virginia Department of Education (WVDE) based professional development regarding the implementation of Professional Learning Communities (PLCs), the RESA2 executive director conducted a day-long session on PLC training to all administrators in Mason County. The county hired Solution Tree Associates for six (6) days of PLC for central office staff and school administrators. Through initial discussions with central office staff, it was not clear that the purpose or focus of the PLC was clear to the administrators. Each school is implementing PLCs in some capacity. Through continued, sustained professional development, these PLCs should deepen educators' commitment to improving student achievement through data analyses and strong, research-based instructional practices. It will be important for the county curriculum staff to follow up on the implementation and effectiveness of the school based PLCs to assess future professional development needs.

Through central office curriculum staff interviews, it was evident the county has not fully utilized the teachers trained during the WVDE Teacher Leadership Institutes (2007-2010). No one in the central office could provide a listing of participants in Teacher Leadership Institutes. The Team recommended that the central office staff contact the WVDE Office of Instruction to obtain the participants names and utilize the Teacher Leaders to further the capacity building effort. Participants were trained in standards-based instructional strategies and Project Based Learning (PBL). However, the Team determined there was no opportunity for these educators to share their knowledge with others in the county.

MASON COUNTY SUMMARY

The Education Performance Audit of the county school district practices in Mason County revealed several deficiencies in leadership, financial management practices, personnel hiring practices, employee evaluation practices, and facility preventive maintenance practices. Missing agendas, minutes of meetings, and other items in the county office point to a breach in security that needs fixed immediately. Resolving the financial deficit as well as correcting several financial management irregularities is a pressing concern that must be overcome. A resolve to follow the law on hiring, assigning within certification areas and evaluating employees is necessary to improve student performance and establish credibility with employees. The huge investment in new and improved school facilities needs protected with preventive maintenance programs that will protect systems and provide more efficiencies and safety for students.

Several promising practices and programs have been implemented and planned to increase student learning. Technology infrastructure and equipment has been a priority and is a commendable area. A commendable effort has been made to modernize and upgrade the facilities in the past several years. Student performance is acceptable in several areas including attendance, participation rates, graduation rates, college going rates, college remediation rates, Advanced Placement scores and most subgroup performance on the WESTEST2. The subgroups of special education and low socio-economic status remain as problem areas that need addressed. Hiring and placement of less than fully certified special education staff contributes to and aggravates the problem.

Leadership turnover at the county office level has destabilized the system and probably has contributed to the many deficiencies in finance and personnel management. The current county superintendent appears to have the support of the school board and may be uniquely qualified from her past experiences in the system to move the system forward. She appears to have the resolve and skills to manage the system effectively and provide a stabilizing force.

The Education Performance Audits of the individual schools did not reveal serious deficiencies that could not be corrected by good county leadership.

Recommendation for Mason County Schools

1. The office of Education Performance Audits respectfully recommends that the West Virginia Board of Education continue the Mason County School District's Full Approval status and be given a December 15, 2011 Date Certain to demonstrate substantial progress in correcting the deficiencies noted in the report.
2. The Office of Education Performance Audits further recommends that the West Virginia Department of Education, System of School Support, be instituted immediately to assist the Mason County School District in working through the process of alleviating the financial deficit and improving student performance.
3. It is further recommended that Mason County and each individual school revise their Five-Year-Strategic Plans and the schools be given until the next accreditation cycle to correct deficiencies noted in the reports.