



## Report of the Vermont State Auditor

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December 23, 2010

# SUPPLEMENTAL REPORT TO MGT OF AMERICA, INC.'S PERFORMANCE AUDIT OF SOUTHWESTERN VERMONT SUPERVISORY UNION

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**Thomas M. Salmon, CPA**  
**Vermont State Auditor**

THOMAS M. SALMON, CPA  
STATE AUDITOR



STATE OF VERMONT  
OFFICE OF THE STATE AUDITOR

December 23, 2010

Ms. Catherine McClure  
Superintendent  
Southwest Vermont Supervisory Union  
246 South Stream Road  
Bennington, Vermont 05201

Dear Catherine,

I am pleased to submit the attached supplemental report to the MGT of America, Inc.'s Performance Audit of the Southwest Vermont Supervisory Union.

This report contains the SVSU response to the recommendations contained in the audit report along with a summary of MGT's comment on the SVSU's response.

We would like to thank you and your staff as well as the MGT audit team for the assistance and cooperation provided during the audit process.

Sincerely,

*Thomas M. Salmon CPA*

Thomas M. Salmon, CPA  
Vermont State Auditor

## SAO'S SUMMARY OF MGT'S EVALUATION OF THE RESPONSE FROM THE SVSU

The auditor's office consulted with MGT on the SVSU's response to their audit report, and their comments have been summarized and are shown below.

The numbers below correspond to the numbers placed on the SVSU's 10/27/10 response (copy attached) to permit an easy review.

1. The MGT audit team sent a detailed scope and methodology to the SVSU in advance of starting the audit and the scope did not change.
2. According to MGT, their experience indicates that it is not uncommon for grant writing positions to be functionally placed in the Business Office and the "grant writing and state reporting aspect of the position" are inherent in the title "Director of Grants Management and State Reporting."
3. The SVSU did not provide any evidence or even mention to the MGT audit team that the Vermont Department of Education had concerns about this position during any of its three opportunities to review and respond to the audit report.
4. The MGT audit team believes these special education responsibilities can be handled at a coordinator level position and overseen by the Director of Special Education we propose in Exhibit 1-11.
5. The MGT audit team still believes that these tasks can be handled at the coordinator level and managed in the new proposed structure.
6. It would be nearly impossible and irrelevant to attempt to detail the history of every staff position mentioned in the audit report. MGT stands by their recommendation that the position should be returned to a coordinator level position.
7. MGT stands by their recommendation for those schools with fewer than 300 students. The recommendation certainly would not apply to schools that are expected to quickly grow from less than to more than 300 students.
8. The MGT audit team believes that the SVSU misunderstands the substance of the recommendation. They recommend that the SVSU develop written measures that can be tracked and reported to assist with ongoing performance improvement. Developing and passing budgets for school districts is not a performance measure, it's a requirement.
9. At no time during the audit or the opportunities the SVSU had to review the audit report did the SVSU mention or provide evidence that it had implemented a new review schedule of policies required by law. As MGT pointed out in the audit, several of the SVSU's policies do not comply with current laws.

10. According to MGT, they did not refer to “the VSBA as providing the yellow book standard” and the SVSU fails to recognize that there is a compliance requirement with those policies, required by law. The VSBA website and our report summarize a variety of policies required by law and recommended as best practices.
11. MGT stands by their statement that “the policies should be updated and improved because they do not address several critical components” and are pleased that the SVSU agrees.
12. While the SVSU may have lists of classes teachers may take, it was unable to provide evidence of classes actually taken or that the teachers maintained an adequate level of continuing proficiency.
13. MGT found no evidence during their onsite review that the SVSU had a teacher dedicated to development and oversight of transition activities or regarding a “work start” program. Moreover, MGT found that the Transition Portfolio system was inconsistent from school to school and that the transition services were inadequate.
14. Although MGT requested all personnel department manuals and procedures, the SVSU did not provide them with a copy of any hiring manuals. The SVSU did not mention the existence of such a manual during its opportunities to review the draft report.
15. As MGT noted in the finding for Recommendation 6-2, several of the SVSU schools and districts lack prekindergarten programs.
16. At no time during the audit or the opportunities the SVSU had to review the audit report did the SVSU mention that it had conducted a food service survey or provide the results to the audit team. The food service company president told MGT that schools annually generate a satisfaction survey, but neither the president nor the SVSU could provide any documentation of surveys administered.
17. At no time during the audit or the opportunities the SVSU had to review the audit report did the SVSU mention or provide evidence that it had changed its transportation services.
18. At no time during the audit or the opportunities the SVSU had to review the audit report did the SVSU mention or provide evidence that it had reduced the number of board meetings.
19. MGT believes that analyzing the most recent data is the most relevant. The data were represented by the SVSU as the latest data available and from the 2009-10 school year. The SVSU did not take issue with these data during the opportunities the SVSU had to review the audit report.

20. Although MGT found that the LEAs signed the IEP cover sheets, staff reported that the LEAs do not consistently participate in the entire IEP meetings.
21. MGT clearly stated in the report that “During onsite school visits and staff interviews, the audit team found that special education resource paraprofessionals are most often assigned to the general education classroom by the school principal and supervised by the general education classroom teacher. It was frequently reported by numerous sources that there is little communication or collaboration among the special education teacher, the general education teacher, and the special education paraprofessional. This communication is critical to ensure that the goals and objective of the student’s IEP are fully implemented and progress toward mastery is documented.”
22. Although this model may have been discussed, MGT found no evidence of its implementation during our onsite visits.
23. MGT acknowledged the SVSU’s efforts on page 48 of the report. The point here is that although the SVSU has some acceleration initiatives, it lacks a policy to govern them.
24. MGT clearly stated on page 59 of the report, “The SVSU and school administrators have an array of SVSU- and school-based processes that are intended to improve teachers’ instructional skills and administrators’ instructional leadership; improve student achievement; focus attention on the needs and knowledge of individual students; and improve the use of that information to enhance instruction, professional development, and SVSU and district procedures.” However, the systems are outdated and do not align with mandates.
25. Identified school in Year 2 Improvement is a corrective action due to failure to meet AYP.
26. Schools are implied in our recommendation to assist school districts.
27. The SVSU did not provide the MGT audit team with a copy of any hiring manual, so we cannot comment on the steps within such a manual. The SVSU did not mention or provide this manual during the audit or opportunities the SVSU had to review the audit report. The MGT audit team stands by its finding and recommendation that the SVSU has insufficient and inadequate guidance and needs to create policies and procedures that are aligned with best practices and state and federal requirements.
28. As stated in the report, MGT would like to see the SVSU formalize the process and manage the Medicaid fund balances to a reasonable level.
29. The SVSU does not have formal policies or performance metrics in place for all functional areas. Specifically, the documents lack the following policies as required or recommended by VSBA: fiscal management and general financial accountability, budgeting, financial reports and statements, and risk management. In addition, the documents lack a procurement and return of goods policy and

procedures for noninformation technology surplus goods. Without formal policies for all functional areas, the organization is at risk of a disruption in business in the event of key staff losses.

30. The SVSU did not provide the MGT audit team with any evidence that “purchasing cooperatives in the state of Vermont have not proven to be highly effective over the years.” Nevertheless, because purchasing cooperatives have been successful in other states, we believe the SVSU should consider them again.
31. The substance of the recommendation is to allow the line and business managers to cut checks up to a certain dollar threshold and then to have the boards approve these checks later at the next scheduled meeting. Thus, many vendors and payees would be paid more quickly. Implementing this recommendation would not result in additional workload for the central office, it would just push back the timing of the board approval of these checks.
32. Simply put, if two SUs each needed a half-time person to deal with a peak workload – such as payroll – they could consider sharing a full-time person.
33. MGT believes that declining this recommendation without explanation or further study is short-sighted. Continued operation of the elementary school with an enrollment of less than 50 students in Woodford School District is inefficient and costly, especially when adequate space and facilities, as well as expanded education programs are available nearby.
34. MGT disagrees. Their research shows that implementing their recommendation would bring the SVSU student meal prices to about the statewide average. MGT finds it interesting that the SVSU accepted our recommendation to increase the adult meal prices “without more research and thought.”
35. The SVSU did not provide MGT with any evident regarding the value of this program before or after it implemented the program. In any event, this finding and recommendation was removed from the final draft MGT sent to the SVSU, and prior to the SVSU sending us its response to the audit.

In May of 2009 and specifically in February 2010, the Vermont State Auditor invited the SVSU to participate in a study of supervisory union efficiencies and inefficiencies in order to inform then current and continuing conversations regarding public school governance in the State of Vermont. In a letter dated March 4, 2010 our acceptance of the invitation was confirmed noting the statutory authority of the auditor's office to conduct such studies.

At that time and throughout early discussions with principals of MGT of America, Inc. we were encouraged by the opportunity to confirm what professionals and legislators throughout the State of Vermont had expressed regarding the development of Southwest Vermont Supervisory Union services to its member districts. We understood this to be an opportunity to confirm the success of the supervisory union in providing more centralized services by agreement of the member school districts than Vermont Statutes required. In subsequent meetings and during the on site visit in April of 2010 we anticipated a study which would research the potential for improved instructional and management services by further expansion of centralized services.

When initial confidential documents were released to us on July 21, 2010 and reviewed with us on July 29, 2010, we came to the realization that the study being conducted by MGT far exceeded the scope of what we had anticipated. This scope, typically referenced as a performance audit, involves application of “Accepted Government Accounting Practices” or “Yellow Book” methodology to practitioner driven, Teaching and Learning, Policy Development, and Leadership. We recognized the potential of this methodology; it has proven in the end to provide us with an opportunity to examine the effectiveness of SVSU selected operations within a snapshot of time. However, this necessitated, following the July meeting, a lengthy process to organize and provide to MGT substantial additional documentation to support completion of a fair and accurate “audit” in accordance with “Yellow Book” standards.

Vermont State Auditor, Tom Salmon has promoted management audits as another tool which municipalities and other entities, such as school districts, can use to improve services. Indeed, what we have as a result is a document which provides an objective lens by which MGT has observed the complexity of delivering centralized services and leadership in a supervisory union of multiple member districts. “Despite attempts of the SU to achieve a unified vision and direction, the team found that the majority of our audit findings derived in whole or in part from the divided structure and governance of the SVSU and its member districts”. (pg. 6)

Tom Salmon has shared his appreciation “for the courage of the SVSU to seek to improve services and functions on behalf of Vermont students and to participate in such a complex process given that no Vermont School District or Supervisory Union has experienced an audit of this type”. Certainly being the first to experience such an audit has had its challenges, but every challenge in life, including this one, provides the opportunity to enhance self reflection and develop the promise of a well informed future.

The **recommendation within this report for consolidation** as a supervisory district is **timely** as each of the member school districts and supervisory union itself must consider the governor's

and legislators' recent **Challenge for Change** with educational goals complementing a request for reductions in fiscal year 2011 school district budgets and **Act 153** calling for voluntary merger and expanded supervisory union services. The release of this audit is also timely because it follows an encouraging discussion among elementary board members about shared programming, shared personnel, shared students, and shared operations and equipment held on Thursday, October 14, 2010. Also, this report is released prior to the November 18, 2010 SVSU Board of Directors' meeting where the voluntary merger section of Act 153 will be discussed.

**As Superintendent of Schools, I support the recommendation for consolidation.** Please reference the full response of the SVSU to this management audit for a description of the benefits of consolidation, and why I believe this audit begins to answer in more detail not only the financial benefit of consolidation, but more importantly the educational benefits of consolidation for all our students. I have stated elsewhere why I believe in consolidation as the means to ensure the sustainability of our schools; ensure local control while improving services and educational opportunities for all of our students. Within the text of our full response to this performance audit, you will note disagreement with the audit recommendation to close one of our smallest schools. Many before me have shown how a consolidated system would contribute to the sustainability of small rural schools by eliminating the boundaries for school attendance creating the potential for redefining attendance areas or, indeed, offering equitable systems for elementary school choice.

As you read this audit and consider our response to the recommendations of MGT of America, Inc, I trust you will commend the efforts of all the Central Office Directors, the Business Administrator, all other central office employees, and your school Principals and Assistant Principals for their support, effort, and focus on my goals of improved communications and improved student achievement, thus building a collaborative foundation for our future. This foundation serves us well as we weigh the benefits of a consolidated future for all our students.

I look forward to your consideration of our SVSU responses to the specific recommendations of MGT of America, Inc. and look forward to the discussion as you consider your own responses.

I would like to thank the following individuals: Tom Salmon, Vermont State Auditor and his Deputy, Joe Juhasz for this opportunity; Tyler Covey, CPA, CMA, CFM, Dr. JoAnn Cox, and Dr. Patti Davis of MGT of America, Inc. for their patience and professional expertise, and Dr Schiller, an MGT subcontractor, for his professional expertise; All of the SVSU Directors, the Business Administrator, and SVSU support staff for their support and care in providing documentation for the study; All of the Board /Prudential Committee members, Principals, Associate/Assistant Principals, Teachers, and Support Staff who contributed to the study

Respectfully submitted on behalf of the employees of the Southwest Vermont Supervisory Union,

Catherine M McClure  
Superintendent of Schools  
October 26, 2010

Southwest Vermont Supervisory Union (SVSU) response to the recommendations of the MGT of America, Inc. Performance Audit of the SSVU at the invitation and request of the Vermont State Auditor.

Audit Results (MGT, Inc Performance Audit SSVU 2010 pages 2 – 5)

As mentioned in the summary of our response, the “yellow book” methodology used for this performance audit and the complexity of a multiple, member district supervisory union governance structure resulted in a lengthy audit process. It is important to note the timing of the original audit visit in early April of 2010 to the completion of the document and our response in October 2010. Between the original visit and the completion of the report, the Vermont School Boards Association moved beyond their 2009 governance discussion proposal (pg 3) to join with others in the development of what has been approved by the Vermont legislature in 2010 as Act 153 commonly referred to as the bill for voluntary merger.

Recommendation: Seek authorization to convert to and become a supervisory district (pg 2)

The recommendation within this report for consolidation as a supervisory district is **timely** as each of the member school districts and supervisory union itself must consider the governor’s and legislators’ recent **Challenge for Change** with educational goals complementing a request for reductions in fiscal year 2011 school district budgets and **Act 153** calling for voluntary merger and expanded supervisory union services. The release of this audit is also timely because it follows an encouraging discussion among elementary board members about shared programming, shared personnel, shared students, and shared operations and equipment held on Thursday, October 14, 2010. Also, this report is released prior to the November 18, 2010 SSVU Board of Directors’ meeting where the voluntary merger section of Act 153 will be discussed. The range of consolidation options for the member districts of the supervisory union is wide, from the supervisory district recommended by MGT to the most recent option of a regional educational district. It is our belief

- consolidation will meet the urgent goal of the most rural of the member districts to sustain their schools by eliminating or redefining district boundaries for student attendance, as these schools are and represent the “heart” of their communities.
- within a consolidated governance system Bennington School District students would benefit from eliminating the boundaries for school attendance creating the potential for redefining attendance areas or, indeed, offering equitable systems for elementary school choice and the exploration of magnet schools.
- consolidation will allow the Superintendent of Schools to provide concentrated attention to instructional leadership in collaboration with central office administrators, supporting the instructional leadership roles of building Principals and Associate/Assistant Principals.
- consolidation will provide the means for unified, strategic planning to strengthen and increase educational opportunities for all of our students replacing the long range plan approach necessary within a multiple member district governance structure
- consolidation will allow a unified focus and prioritization of instructional and operational initiatives with greater concentration of resources and support

- consolidation will provide a means by which member districts will withstand the waxing and waning of opinions with regard to centralization agreements for sharing common resources
- Further, a consolidated district will reduce redundant operations; for example, as referenced by MGT in finance
- consolidation will reduce the number of individual boards, while retaining direct community representation. reducing the repetition of actions such as policy approval

Recommendation: Central Office staffing reductions and changes in position responsibilities (pg. 3&4)

There are many staffing recommendations throughout the audit. I will respond to each with background information, but as for the recommendations of staffing in central office I will take the recommendations under advisement to inform a more detailed study within the forthcoming conversations about consolidation.

MGT staffing recommendations follow MGT advice to first consider consolidation and then the separate recommendations offered within the audit.

- Eliminate the current Assistant Superintendent position.

This position is currently vacant to eliminate a layer of administrative structure to ensure closer connection of the superintendent to the schools. It has also been left vacant to weigh whether or not the position can be eliminated within the current governance structure in light of the economic times.

- Eliminate the current Director of Grants Management and State Reporting and
- Convert the Directors of After School and Summer Programming, Student Support Services, and Early Education to coordinators.

The current SVSU administrative structure was established to clarify the role of Directors as content specialists working not only in central office but in the field to ensure collaborative decision making with the building Principals.

Director of Grants Management and State Reporting: The State reporting aspect of this position is not reflected within the MGT audit nor is the grant writing aspect of the position. There is a recommendation further in the audit to add a position within the finance department to cover grant management responsibilities. Consequently, the savings would not be as reported in this section. Placing such a position in finance gives no merit to the educational background needed to write instructional strategies within the allocated and competitive grants.

Director of Afterschool and Summer Programming: This position was elevated from a Coordinator position to Director because of concerns within the Vermont State Department of Education that the position lacked authority and lacked representation on the SVSU Administrative Team.

Director of Student Support Services: The MGT audit gives no reference to the Special Education responsibilities this position retains from the former positions of Senior Director of Special Education and Director of Special Education, a result of the position of Assistant Superintendent for Special Services being eliminated. The remainder of the position assigned to Student Support Services was created to ensure a central office liaison for nurses, psychologists, behavior interventionists, social workers/clinicians, special education evaluators, and guidance counselors. The responsibility for developing a targeted response to chronic absenteeism and tardiness, and children in trauma or those experiencing trauma was not mentioned in the MGT audit. These difficulties directly relate to student achievement and high school graduation rates.

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Director of Early Childhood Education: The MGT report gives no recognition to the former designation of this position as Coordinator. The position was elevated to Director to facilitate an expanded scope of responsibilities from simply the “Principal” of the SVSU Early Education Program to meet our special education responsibilities at age 3 to the transitional responsibilities of pre-school through Kindergarten and the responsibilities for the development of community partners under Vermont Act 62 for each of the five, independent, elementary, member districts.

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- Eliminate the Assistant Principal positions for elementary schools with fewer than 300 students.

The only elementary schools that currently have Assistant Principals are Molly Stark and Bennington Elementary. Molly Stark student enrollment is greater than 300 and Bennington Elementary School student enrollment is 297 students as of October 2010. Who among us would recommend the elimination of an assistant principal for the Bennington Elementary School which is one of the schools with rising student populations and the highest poverty rate in the SVSU.

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#### Key Findings:

Other key findings that the MGT team identified as largely related to the fragmented governance structure within the SVSU, including the following:

1. The SVSU Business Office does not have formal performance measures/metrics to help ensure good customer service and accountability.

#### Accepted with clarification

While it is true the Business office does not have formal written performance measures, we support performance measures as a means of validating the effective performance of any department. The finance department has been working under and the boards have been aware of the current unwritten measures. In numerous years preceding and including FY ‘05, the audits of the districts contained numerous exceptions. It was agreed going forward a strong clear message was for the business office to eliminate all

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exceptions from the audits. The other main measurable was and continues to be to develop and pass all the district's annual budgets. This recommendation would be much simpler in its development under a consolidated district as described in MGT recommendations. We are in support of working with all the stakeholders to develop other measurable performance goals by convening a committee of stakeholders to develop such performance measures.

2. Most of the SVSU Board policies are out of date, with an average of almost seven years since the policies were reported as being updated.

Accepted with clarifications

Policy development is one of the primary responsibilities of school boards as policy guides the operation and management of the entity and ultimately its liability. There is individual board/prudential committee representation on the SVSU wide policy committee which meets the second Wednesday of each month at 5:00 P.M.

Recognition is given to outdated policies and a review schedule of policies required by federal and state law has been implemented. Prior to this year a policy review date was not referenced on the policy itself if no changes were made. Consequently, many policies which have been reviewed do not appear to have been reviewed. Review dates will be recorded on all policies.

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MGT references the Vermont School Boards Association as providing the "yellow book" standard for the development of policy. The Vermont School Boards Association provides a service of model policies, guidelines which individual districts and consolidated districts within the state can reference as a guide when developing their own policies. There is no compliance requirement. The Vermont School Boards Association is not a regulatory agency. However, good guidance is provided, including notations and updates of federal and state requirements related to policy.

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This finding is directly related to the current governance structure. It is not required that all the districts have the same policies; however, the boards have worked hard to unify policies across the SU under a policy for unification of policy, Policy # 1000. As a result, the process for policy approval is cumbersome at best. Although we have an SVSU wide policy committee, each policy must circulate between each of the seven boards in a working draft, then a warned policy, and then a policy ready for adoption. As most Boards meet once a month it can take a minimum of three months for a policy to move through the approval process, but more frequently a longer time to have policies adopted.

3. The SVSU does not have written curriculum and instruction procedures and its curriculum policies should be updated and improved because these do not address several critical components recommended by educational experts.

Accepted with clarification

Curriculum and instructional procedures exist in both Policy # 6000 and within the 1996/2002 extended Long Range Plan. It is agreed these need updating to ensure the inclusion of critical components.

4. The SVSU does not uniformly communicate a vision of curriculum and instruction across the school districts and to all personnel through written goals, objectives, procedures, timelines, and benchmarks for achievement by individual units.

Accepted with clarification

Written grade level objectives with alignment to current Vermont State Standards do exist. An updated long range plan or in a consolidated structure a strategic plan would ensure a uniformly communicated vision of curriculum and instruction and describe the process through which written goals, objectives, procedures, timelines, and benchmarks for achievement by individual units would be developed and communicated. During 2008-2009 and 2009-2010 curriculum committees were re-established and continued.

5. The SVSU has many effective instructional programs and interventions in the schools. However, the SVSU has not designed a mechanism to systematically examine and promulgate best practices to principals and staff throughout the supervisory union.

Accepted with clarification

Supervisory Union PLCs (Professional Learning Communities [Dufour model]) include a learning component during which best practices are shared. These PLCs have met during supervisory union in-service days for the past four years. Current development of a strengthened SSU Administrative Team could provide the means by which best practices are examined and promulgated.

6. The SVSU does not provide adequate staff development to general education teachers regarding differentiated instruction, accommodations, and research-based instructional strategies

Accepted with clarification

The SVSU offers many professional development opportunities as evidenced by course lists for each year. The intent is to develop an SU wide professional development committee to ensure multi-year professional development initiatives based on student data. This committee would complement the work of the current in-service committee.

7. The SVSU does not have a strategic plan for its special education services, which is important because it did not meet special education state performance targets for

graduation rates, dropout rates, assessment proficiency, least restrictive educational environments, or transition services.

Accepted with clarification

We would expect a special education strategic plan to be developed within a revision to the 1996/2002 extended long range plan or within a consolidated structure within the development of a strategic plan

Five years ago the Director of Special Education and a group of 10 special education teachers developed the following VISION & MISSION for the SVSU special education department:

*It is our shared vision that children will be empowered and prepared to be compassionate, creative and productive lifelong learners. Working together, we will provide our students with opportunities to improve and enhance their lives through personal growth and the realization that they are valuable and contributing members of our society.*

This Vision is posted on the opening page of the SVSU Special Ed website [www.svsu.org](http://www.svsu.org). The Director of Special Education, Director of Special Services and Director of Early Childhood Programs developed THREE GOALS to improve special education services. In the past, the three Directors have made formal presentations to the SVSU School Board regarding our goals and strategies to improve Special Education in the SVSU. Each goal has measureable objectives and strategies associated with it. These goals were established in 2008 and are measured annually.

1. Adequate Yearly Progress (AYP/NCLB) for students with disabilities will improve in the areas of reading and math, and the high school drop-out rate for students with disabilities will decrease.
2. The number of students with disabilities eligible for special education will decrease.
3. The number of students with disabilities placed in restrictive settings will decrease.

The MGT recommendation for an “annual special education strategic plan” is comprehensive and expands upon the work we have begun. The referenced components are more specific and would help to establish a process to connect professional development, to the vision, mission and annual goals. A strategic plan for SVSU special education could also integrate the State Performance Plan data and the focused monitoring activities into an annual process for review. The MGT recommended process would also include annual review of progress toward our goals. The recommendation would also expand our collaboration with related service providers and general education professionals.

8. The SVSU lacks a consistently effective inclusive education model for students with disabilities. Students with disabilities lag behind their typical peers in academic performance as measured by state assessments

Accepted with clarification

The SVSU Special Education Department has worked diligently over the years to establish a continuum of services for children with disabilities as required by Federal and State laws. Co-Teaching has emerged as a potential best practice for delivering special education services in the least restrictive environment, as well as enabling the child to access the general curriculum. However, the Vermont Department of Education did not recognize co-teaching as an allowable special education service until July 1, 2010. Now, the VT DOE has set forth specific requirements for IEP teams to consider co-teaching as a potential service: VT DOE Special Ed Regulations 2360.3.1(1) (i) (A). The SVSU is currently working toward compliance with these requirements which include continuous professional development in the co-teaching models. A written plan for approval for co-teaching must be submitted to the VT DOE for approval before the service can be implemented for a student. The SVSU will submit a plan within the next month. The Vermont Council of Special Ed Administrators and the VT DOE have arranged for two major conferences on co-teaching this year. The SVSU is purchasing materials and videos on the subject of co-teaching that will be available for administration, teachers, paraprofessionals and parents.

9. Options for SVSU students with disabilities in planning and implementing transition services to post-secondary opportunities are limited.

Accepted with clarification

Post-secondary outcomes for students with disabilities have been seriously affected by a number of things such as the poor economic climate, cuts to adult service agencies, increased family stressors, and social/peer pressure to participate in unhealthy behaviors. High School special education staff participated in a University of Kansas distance learning program on best practices for transition of students with disabilities. This included a self-determination/self-advocacy curriculum for students with disabilities. The SVSU has been improving the array of transition services at the HS for students with disabilities such as:

- Addition of Special Ed teacher (IDEA Funded) specifically dedicated to development and oversight of transition activities within the high school and community.
- Transition Portfolio system for students with severe disabilities

- “Work Start” community work experience program for students with emotional/behavioral disabilities
- Implementation of transition activities, curriculum, and assessments such as self-advocacy, interest inventories, community work site visits, in special classes for students.

During this school year (FY 11) the SVSU will participate in compliance monitoring targeted toward the content of transition plans in individual student’s IEPs. We have already participated in a required VT DOE training on the essential content for the transition plans. During this year there will be a significant improvement in the content and quality of our transition plans for students.

The Drop Out and Graduation data from the State Performance Plan has been reviewed and discussed with the special education staff and high school administration.

10. Hiring practices (screening, interviewing, and reference checking) are inconsistent from site-to-site, and there is no formal training regarding interview and reference check protocols

Accepted

MGT has not referenced the existence of a hiring manual. However, the adherence to the hiring manual by the member district administrators is inconsistent. The current Superintendent of Schools has been working with the principals individually to ensure consistent and best practices in hiring. There is agreement that the current manual needs updating. This is an item on the recognized “to do list” for revising and building the infrastructure of the supervisory union oversight of agreed shared services by the member districts.

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11. The SVSU’s facilities use and management, including custodial services and maintenance, are not efficient or cost-effective. Because each of the school districts separately employs custodial and maintenance staff, there is a lack of overall supervision, lack of efficiency in ordering and purchasing equipment and materials, and a lack of planning.

Accepted

12. SVSU is in need of a long-range comprehensive facility master plan to guide decision-making about facilities that support the educational programs. A supervisory union-wide facilities plan currently does not exist. As a consequence, some facilities are under-capacity (such as MAUMS), which increases overall costs, and some educational services are not provided (for example, prekindergarten).

Accepted with clarification

While this is an accurate finding as it relates to a comprehensive facilities management plan, recognition must be given to the sharing of facilities management. Frequently, facilities staffs share expertise and manpower across the independent districts in maintenance and construction matters. This requires, however, careful notation of billing documentation. The observation of educational services not provided for as referenced in this section (eg. Pre-Kindergarten) is not accurate. The Bennington School District houses the SVSU wide program to meet the needs of special education students at age 3. Vermont Act 62 requires a first partner exploration with area child care/pre-school providers for pre-school education. The Shaftsbury School District was the first SVSU District to successfully secure grant funding to develop what has become an exemplary program followed by North Bennington as referenced elsewhere in the MGT audit. Pownal is in the planning stages for implementation and we anticipate the Bennington School District will follow. However, the expanded scope this will add to the Director of Early Childhood Education will require additional support.

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13. The SVSU lacks a formal method of surveying students regarding satisfaction levels of service, food quality, and choice.

Accepted

Actually, at least one school district of the six independent, member districts, has surveyed their students (Pownal school district). The re-establishment of the SVSU Food Service Advisory Committee this year will assure that such a process is conducted throughout the SVSU.

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14. There are no minimum expectations for technology expertise by new teacher hires, and there are no requirements for staff development in technology. This lack of technology related expectations could create inequities with regard to students' experience in the classroom.

Accepted with clarification

This finding relates to the current governance structure. The supervisory union cannot set requirements in areas where there have been no agreements for a unified approach by the member districts. However, that does not preclude the individual Principals from setting a technology expectation when interviewing potential hires.

15. The SVSU does not centrally coordinate transportation services for all of its member districts.

Accepted as described in Recommendations 9.1 and 9.3 (pgs.119&120)

16. Transportation for students with disabilities is provided by a paraprofessional coordinator and between 8 to 10 drivers who use their personal vehicles to transport 90 to 100 students. This system is difficult to manage and carries high liability and insurance risks.

Implemented

This potential liability was identified prior to MGT's Performance Audit and has been corrected. Students with disabilities who require transportation as a related service are now served through the SVSU transportation contract.

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## 1.0 Administration

The SVSU and the member school districts constitute seven boards, all of which meet separately to discuss various operational issues, budgets, and policies. Having so many boards can lead to fractured decision making and inconsistent guidance for school district and SVSU staff. (pg.13)

### RECOMMENDATION 1-1:

**The SVSU Board and member district boards should assess their operations and determine methods to streamline and centralize decision making for consistency, beginning with a board assessment using tools such as the VT School Boards Association survey.**

Referred to Board/Prudential Committee Chairs for Consideration

The SVSU Board is required under Act 153 to discuss voluntary merger by early December. Such a discussion has the potential for serious consideration of consolidation and its related centralized decision making with representation from each of the communities which currently comprise the SVSU. A board assessment tool such as the one offered by the Vermont School Boards Association is always valuable in evaluating board effectiveness.

**RECOMMENDATION 1-2:**

**Consider reducing the number of Board meetings.**

Referred to Board/Prudential Committee Chairs for further consideration

Two school district boards, that previously held their meetings twice a month, have reduced their meetings to once a month (the Bennington School District and the Mount Anthony School District). While these actions have assisted tremendously, there are still more than ten board or prudential committee meetings and sub-committee meetings per month. The Vermont School Boards Association has promoted a policy governance model which assists in focusing boards on their primary responsibility of setting policy. There has been some limited discussion at the SVSU Board regarding an executive committee operational model.

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**RECOMMENDATION 1-3:**

**SVSU and its school district Boards should consider reducing or eliminating the stipends for Board members and redirect the money to programs and direct services for the school districts.**

Referred to the Board and Prudential Committee Chairs for discussion with their respective boards/prudential committee

**RECOMMENDATION 1-4:**

**The SVSU Board should routinely take action to update and approve Board policies at the annual meeting for the election of officers.**

Accepted with clarification

The current supervisory union structure of multiple member districts means there are seven annual organizational meetings for the purpose of electing officers. In a consolidated system the agenda of the single annual organizational meeting could efficiently include those policies which should be reviewed annually. In the meantime using the seven organizational meetings to include the policies which should be reviewed annually will be considered.

**RECOMMENDATION 1-5:**

**The SVSU should continue its efforts to budget an appropriate amount for legal work in Fiscal Year 2010-11 in anticipation of all legal services needed.**

Accepted

**RECOMMENDATION 1-6:**

**The SVSU and member school districts need to consider moving to a more consolidated structure that reduces the number of administrative positions.**

Taken under advisement

All staffing recommendations will be taken under advisement to inform a separate detailed study.

**RECOMMENDATION 1-7:**

**The SVSU should develop a five-year strategic plan that is aligned with its strategic goals and budget and ensure that Board policies and all other plans are aligned with the strategic plan and goals.**

Accepted with clarification

A strategic plan as described above is accepted as a recommendation which is more effectively developed in a single district governance structure. Should the supervisory union structure of multiple member districts continue the current long range plan should be revised. The latter has been recommended by the current Superintendent

**RECOMMENDATION 1-8:**

**The SVSU should present the potential savings and benefits of converting to a supervisory district (from its current supervisory union status) to its electorate and member school districts.**

Accepted with clarification

The SVSU Board is currently required to hold a discussion regarding voluntary merger under Act 153. The intent of the recommendation here and elsewhere in the MGT Performance Audit is for a consolidation of districts. Even more important than the financial benefit is the educational benefit of consolidation for all of our students. We support consolidation as a means to ensure sustainability of our schools and local control while improving services and educational opportunities for our students.

Please note that all staffing recommendations given in the findings for this section will be taken under advisement for a detailed study.

**RECOMMENDATION 1-9:**

**The VT Department of Education should continue to advocate for the recommendations contained in the 2006 Commissioner report to consolidate school districts and the Vermont Legislature should convert supervisory unions to supervisory district models statewide.**

Referred to the Commissioner and Legislators with clarification

This recommendation for consolidation predates Act 153, voluntary merger.

## **2.0 Special Services and Programs**

**RECOMMENDATION 2-1:**

**The SVSU should develop an annual special education strategic plan including mission, vision, goals, objectives, activities, evaluation, and a scope and sequence timeline of training and education support activities for its schools.**

Accepted with clarification

Such strategic planning should occur within the recommended strategic planning for the entire supervisory union most effectively conducted within a consolidated governance structure. In the absence of consolidation as special education services are currently centralized the recommendation for strategic planning should be followed.

Five years ago the Director of Special Education and a group of 10 special education teachers developed the following VISION & MISSION for the SVSU special education department:

**It is our shared vision that children will be empowered and prepared to be compassionate, creative and productive lifelong learners. Working together, we will provide our students with opportunities to improve and enhance their lives through personal growth and the realization that they are valuable and contributing members of our society.**

This Vision is posted on the opening page of the SVSU Special Ed website [www.svsu.org](http://www.svsu.org) . The Director of Special Education, Director of Special Services and Director of Early Childhood Programs developed THREE GOALS to improve special education services. In the past, the three Directors have made formal presentations to the SVSU School Board

regarding our goals and strategies to improve Special Education in the SVSU. Each goal has measureable objectives and strategies associated with it. These goals were established in 2008 and are measured annually.

- 1 Adequate Yearly Progress (AYP/NCLB) for students with disabilities will improve in the areas of reading and math, and the high school drop out rate for students with disabilities will decrease.
- 2 The number of students with disabilities eligible for special education will decrease.
3. The number of students with disabilities placed in restrictive settings will decrea3s

The MGT recommendation for an “annual special education strategic plan” is comprehensive and expands upon the work we have begun. The components are more specific and would help to establish a process to connect many of the activities, such as professional development, to the vision, mission and annual goals. A strategic plan for SVSU special education could also integrate the State Performance Plan data and the focused monitoring activities into an annual process for review. The MGT recommended process would also include annual review of progress toward our goals. The recommendation would also expand our collaboration with related service providers and general education professionals.

#### **RECOMMENDATION 2-2:**

**The SVSU should continue to develop the Response to Intervention tiered intervention model and strengthen education support teams in the schools. The Department of Curriculum and Instruction should assume the lead in working with school based teams with support from consulting teachers in the Department of Special Education.**

Accepted with clarification

It is unclear other than the evaluation results in Exhibit 2-4, which are contested below, how the writer found clear evidence of the ESTs as lacking in each of the buildings.

The findings for Recommendation 2.2 are based on inaccurate facts. First, the year that is being measured is the 08/09 school year, not the 09/10 school year. Further, the sample which is using a small N can be clearly distorted from one year to the next. For example, in the 07/08 school year, Bennington Elementary School had a total of 24 initial evaluations with 66% ending with a disability category; in the same year, Monument School conducted 12 initial evaluations ending with 91 percent eligible. In the future, it would be best to review the eligibility facts for each school over five years at a minimum in order to avoid statistics that do not represent the common practice of a school.

Finally, in the summer of 2008, the director of student support services offered time with each principal to review their EST process and offer documents that would enhance data

driven decision making. As of September 2008, some principals were willing to take time to meet, and others were not available due to other pressures. As an SVSU director does not have direct authority over the buildings, ideas have been offered without any mandated actions.

In the fall of 2008, the SVSU administrators made a presentation outlining the SVSU Pyramid of Instruction and Intervention. The expectation was that building principals would present the information to their teachers and develop a pyramid of instruction and intervention based on the available resources and personnel in each building. These pyramids/plans of interventions need to be reviewed with the principals on an ongoing basis.

#### **RECOMMENDATION 2-3:**

**The SVSU should continue staff development for school administrators regarding special education regulations and compliance with federal law.**

Accepted

The administration concurs with the finding for professional development for all administrators who hold the role of LEA in their buildings. Trainings should be held yearly in special education law and rules as per the State DOE. Further, it is imperative that staff use methodology and curriculum materials that are research based. The current training for all the K-6 teachers for reading is based in scientifically researched programs; evidence for anything other than programs that are scientifically researched were not mentioned in the report.

#### **RECOMMENDATION 2-4:**

**The SVSU should establish a co-teaching model of inclusive education for students with disabilities who do not require a more restrictive setting.**

Accepted with clarification

The SVSU Special Education Department has worked diligently over the years to establish a continuum of services for children with disabilities as required by Federal and State laws. Co-Teaching has emerged as a potential best practice for delivering special education services in the least restrictive environment, as well as enabling the child to access the general curriculum. However, the Vermont Department of Education did not recognize co-teaching as an allowable special education service until July 1, 2010. Now, the VT DOE has set forth specific requirements for IEP teams to consider co-teaching as a potential service: VT DOE Special Ed Regulations 2360.3.1(1) (i) (A). The SVSU is

currently working toward compliance with these requirements which include continuous professional development in the co-teaching models. A written plan for approval for co-teaching must be submitted to the VT DOE for approval before the service can be implemented for a student. The SVSU will submit a plan within the next month. The Vermont Council of Special Ed Administrators and the VT DOE have arranged for two major conferences on co-teaching this year. The SVSU is purchasing materials and videos on the subject of co-teaching that will be available for administration, teachers, paraprofessionals and parents.

#### **RECOMMENDATION 2-5:**

**The SVSU should ensure that the local education agency representative participates in the Individual Educational Program meetings at the school level.**

Accepted with clarification

A LEA or his/her designee attends every IEP meeting as evidenced by each IEP cover page showing the roles of each IEP team member. It is unclear how the auditor determined a lack of LEA membership at the IEP Meetings. To that effect, an IEP could not be held without the LEA in attendance. Further clarification is needed at this point to respond.

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#### **RECOMMENDATION 2-6:**

**The SVSU should continue its efforts to improve successful post-secondary transition of students with disabilities.**

Accepted with clarification

Post-secondary outcomes for students with disabilities have been seriously affected by a number of things such as the poor economic climate, cuts to adult service agencies, increased family stressors, and social/peer pressure to participate in unhealthy behaviors. High School special education staff participated in a University of Kansas distance learning program on best practices for transition of students with disabilities. This included a self-determination/self-advocacy curriculum for students with disabilities. The SVSU has been improving the array of transition services at the HS for students with disabilities such as:

- Addition of Special Ed teacher (IDEA Funded) specifically dedicated to development and oversight of transition activities within the school and community.
- Transition Portfolio system for students with severe disabilities

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- “Work Start” community work experience program for students with emotional/behavioral disabilities
- Implementation of transition activities such as self-advocacy, interest inventories, community work site visits, in special classes for students.

During this school year (FY 11) the SVSU will participate in a compliance monitoring specifically targeted toward the content of transition plans in individual student's IEPs. We have already participated in a required VT DOE training on the essential content for the transition plans. During this year there will be a significant improvement in the content and quality of our transition plans for students.

The Drop Out and Graduation data from the State Performance Plan has been reviewed and discussed with the special education staff and high school administration. The development of an annual special education strategic plan will include more specific actions to address these data.

#### **RECOMMENDATION 2-8:**

**The SVSU should upgrade all computers and software for special education teachers for full utilization of an electronic system for development and monitoring IEPS and special education compliance.**

Accepted with clarification

The technology budget of the SVSU has been unable to support purchase and upgrade of computers for the special education department. Some school districts have provided this service for special education teachers in their building/s, others have not.

With the ARRA dollars we received in FY 10, the special ed. department hired a technology consultant/technician to assess the existing equipment and software available to every special ed. professional in our system. Based on this assessment we found the condition of the technology used by special ed. staff and students in most buildings to be very poor. The consultant developed a technology improvement plan which included over \$100,000.00 in equipment, software, and licenses for special education teachers and students. At this time all special ed. teachers have access to high quality technology and software. The FY 11special education technology plan is focused on professional development for use and integration of technology into daily practice. We are concerned that, with the end of ARRA funding, the technology needs for special education will once again be under-funded, and there will not be the man-power to support and maintain the recently purchased and upgraded equipment. If possible, we may use IDEA funding for a part time technician for future assistance to special education staff.

Infinite Campus was purchased by the SVSU as a student data management system. At the time of the initial purchase we were shown a Special Education module developed by IC for the state of Kentucky that included IEP and evaluation compliance software. Infinite Campus informed us that they were planning to develop this software for Vermont schools, but as of this date the special education compliance software has not been developed or released. All special ed. staff have the necessary technology to utilize this software when it is made available. We have been told that the cost for this software will be included in the contract we have for our student data management system. We anticipate some start up costs for training and initial input of special ed. data into IEP's and evaluations.

#### **RECOMMENDATION 2-9:**

**The SVSU should continue to develop alternatives to the overreliance on paraprofessionals and expand proactive models for special education service delivery.**

Accepted with clarification

The report does not offer any evidence to validate the claim of special education paraprofessionals assigned to regular education classrooms. The special education department has given a directive to all special education teachers and building principals that paraprofessionals are to be assigned and supervised by the special education teachers.

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To make a change in the number and misuse of special education paraprofessional staffing patterns, there will need to be a strategic plan for change. The report does not mention the most important player in making these changes - the LEA at the IEP meeting. The LEA is the person to authenticate the need for a paraprofessional by reviewing data that supports a more restrictive program for a student. The LEA will need training in how to determine the least restrictive settings, in use of the paraprofessional decision making tool, and in how to lead the tough discussions at IEP meetings. Teacher leaders have been identified in each building. These leaders meet once a month for training in a variety of special education issues and are expected to consult with and train the special education staff in their buildings. These leaders will be assigned to be the LEA representative at difficult IEP meetings in each building. The teacher leader model began in the 09-10 school year and was discussed with the MGT auditor; however there is no recognition of this model in the report.

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## Gifted and Talented

### RECOMMENDATION 2-10

**The SVSU should consider developing an academic acceleration model Board policy and program plan.**

Accepted

The SVSU does provide information about opportunities available through CTY Talented and Gifted Youth (Johns Hopkins) based on student NECAP and/or MAP results. An accelerated math program is offered at the middle school, and the elementary schools in Bennington are in the process of purchasing Renzulli software for instructional opportunities related directly to individual student profiles.

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## Extended Learning Programs

### RECOMMENDATION 2-11

**The SVSU should link after-school activities to specific skills deficits as identified by performance progress monitoring in the classroom.**

Accepted

## 3.0 Education Service Delivery

### RECOMMENDATION 3-1

**Continue the efforts of the SVSU curriculum committees to review, revise, and align the SVSU core content curriculum guides with state and national content standards by 2012.**

Accepted

The validation and reinforcement for this process is welcomed.

### **RECOMMENDATION 3-2**

**The SVSU should continue to provide professional development and technical assistance to school administrators and teachers regarding the use of data for progress monitoring and instructional planning and delivery.**

Accepted

The validation and reinforcement is welcomed.

### **RECOMMENDATION 3-3**

**The SVSU should continue to develop curriculum guides, pacing of instruction, and procedures for monitoring student progress that are aligned with the National Core Standards and the Vermont Department of Education's Grade Expectations.**

Accepted

### **RECOMMENDATION 3-4**

**The SVSU should proceed with the SVSU curriculum committee selection of instructional materials consistent with the recommendations and time lines provided by the Vermont Department of Education's Grade Expectations.**

Accepted with clarification

Vermont Department of Education document: “educ\_curr\_cc\_state\_standards\_info” page 10, slide 19 advises the “Alignment of existing curriculum to the Common Core should wait until the Smarter Balanced Assessment Consortium (SBAC) provides an assessment framework and achievement descriptors.”

The SVSU has instructional materials that are aligned to the Vermont Framework of Standards and Learning Opportunities and Grade Expectations. Materials selection is in the “pilot” part of our curriculum design cycle. The Vermont Department of Education has recommended that we follow the recommendations and timelines outlined in

Vermont Department of Education document: “educ\_curr\_cc\_state\_standards\_info” for future materials selections.

### **RECOMMENDATION 3-5**

**The SVSU should develop written procedures to clearly define the role of the school administrator as the instructional leader of the school.**

Accepted

### **RECOMMENDATION 3-6**

**The SVSU should revise the teacher and school administrator evaluation system to align with the state and federal requirements of school improvement and adequate yearly progress of students.**

Accepted with clarification

It is the responsibility of the SVSU Curriculum, Instruction and Assessment “Department” to find, organize and provide staff development for administrators and teachers that is needs-based (according to Vermont Department of Education document “2000” page 6) There is no mention of these opportunities for teachers (that are based on review of student achievement results, best practice strategies, and highly effective schools research) as a section in the report. This is a large part how the SVSU ensures high quality instructional practice, research based strategy discussion of implementation, professional growth and optimum instruction for student success.

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## **School Improvement**

**Note:** There is an error in the MGT report page 63. Bennington Elementary and Pownal School are not in corrective action. They are “identified school” “year 2 school improvement.”

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### **RECOMMENDATION 3-7**

**The SVSU should continue to support local school districts in the development of comprehensive action plans based on the VT Department of Education’s school action plan template and guiding documents and consider creating one school plan that incorporates the elements of the VT action plan and the Title 1 School-wide plan.**

## **RECOMMENDATION 3-8**

**The SVSU should continue to provide advisement and technical assistance to school districts regarding the alignment of professional development and financial resources to the goals and objectives of school action plans.**

Recommendations 3-7 and 3-8 are accepted with clarification

The administration agrees with recommendations 3-7 and 3-8. However, the Vermont Department of Education document “2000” requires each **school** to develop action plans. While the SVSU Curriculum, Instruction and Assessment “Department” continues to offer assistance, provide best practice research, and answer questions, schools are not required to use the SVSU services for action planning. The SVSU is already responsible for determining needs and providing professional development and aligning financial resources to goals of the schools.

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## **RECOMMENDATION 3-9**

**The SVSU should continue to support participating school districts in establishing the organizational structures and supportive leadership necessary to build and sustain Professional Learning Communities in the schools.**

Accepted

The SVSU established SVSU wide Professional Learning Communities of Practice in 2006. During the 2010-2011 year, based on best practice research and discussion with schools regarding time and collaboration needs, PLCs will be expected in all schools. This process began in 2008 with a presentation to principals about the value of school based PLCs. The SVSU has continued to be mindful and direct about PLC organization and supports for success. (FYI: The Vermont Department of Education required schools identified as “in need of improvement” to create “Teacher Learning Communities” with specific expectations that mimic part of the philosophy of PLCs but do not follow the research and best practice.)

### **RECOMMENDATION 3-10**

**The SVSU should continue to collect best practices and resources to disseminate to all schools in the SVSU through utilization of the existing professional learning community websites.**

Accepted with clarification

Best practices research and resources continue to be shared and discussed as required in the “new learning” part of each SVSU PLC agenda. As schools develop building based PLCs, the information follows. School teams have visited other schools to see PLCs in action. The research and best practice articles used for learning in each PLC from 2006 to now are available. Copyright prohibits the SVSU from posting them on individual PLC sites.

## **4.0 Human Resources**

### **RECOMMENDATION 4-1**

**The SVSU should update its human resource policies and present them to the Board for approval.**

Accepted

It is the role of the Personnel Department to develop and administer all Human Resource policies and procedures for all employees. The SVSU has a Policy Drafting Committee that was established to revise, compose and update policies on a regular basis. On this committee, there is one representative from each school board along with the Superintendent. The Human Resources personnel will work with the Policy Drafting Committee and legal counsel to review and update existing policies and prepare new policies as appropriate.

#### **RECOMMENDATION 4-2**

**The SVSU should ensure that its job descriptions are updated and include dates to indicate when they were last created or reviewed. The SVSU should also include periodic reviews and updates of all job descriptions to ensure these remain consistent and match current job requirements.**

Accepted

It is agreed that the SVSU must ensure that its job descriptions are updated and include dates to indicate when they were last created or reviewed. Dates of revision are currently being added. This process must be all encompassing utilizing different employees throughout the SVSU for input.

#### **RECOMMENDATION 4-3**

**The SVSU should ensure that it has a consistent process for ensuring that its administrator contracts are reviewed by legal counsel prior to finalization.**

Accepted

The recommendation is acceptable as review on the part of legal counsel will help the SVSU to avoid any non-compliance. Since implementation of this recommendation will have a cost factor associated with it, this financial impact will need to be considered in the budget planning process.

#### **RECOMMENDATION 4-4**

**The SVSU should create policies and procedures aligned with best practices and recommendations of the Vermont School Board Association related to recruitment, selection, and hiring staff.**

Accepted with clarification

In agreeing with this recommendation, it is important to mention that there does exist an SVSU Hiring Process Manual that explains in detail the steps that need to be taken when hiring a new employee. It needs to be updated, but it is a great starting point. It outlines our consistent steps involved throughout the hiring process.

It is true that certain hiring practices are inconsistent from site to site. It is also true that no formal training has been provided relating to interviewing and reference check protocols. As previously noted and acknowledged under Section 4-1 (D1.), the SVSU would be well served by proposing and implementing a Personnel Recruitment, Selection, Appointment, Criminal Record Check policy. More types of professional education need to be provided to those doing the hiring at all sites within the SVSU. This education will make obvious that procedures in hiring must be clear and consistent.

## 5.0 Financial Management and Purchasing

### **RECOMMENDATION 5-1**

**The SVSU should consider moving human resources and grants management and data and state reporting under the Business Office.**

Under advisement

All central office staffing recommendations will be taken under advisement for a separate detailed study. The following is offered to provide background information.

### **RECOMMENDATION 5-2**

**The SVSU and districts should align its budgets with strategic plan(s) once it updates its strategic plan(s).**

Accepted

The administration is in strong support of aligning budgets with strategic plans. Within a consolidated district with one strategic plan to improve the outcomes for students, money can be strategically directed to the programs that provide the greatest outcomes per the district's plan.

### **RECOMMENDATION 5-3**

**The SVSU should implement a formal budgeting process for Medicaid funds.**

Accepted with clarification

A budget is created which allots approximately \$153,000 to be spent on early childhood services each year. Medicaid pays for student support services at the middle and high

school, funds .5 of the salary for Director of Student Services, pays for behavior specialists, counseling services, after school and summer programs, and provides funding for the Positive Behavioral Supports systems in the elementary schools.

In the spring of 2010, the SU implemented a needs assessment to collect data on priority areas needing funding. For the coming year, \$100,000 has been budgeted for professional development for staff around the needs of students who have experienced trauma and to create compassionate schools, and additional money has been allocated to address chronic absenteeism.

#### **RECOMMENDATION 5-4**

**The SVSU should document and implement formal performance measures for the Business Office.**

Accepted with clarification

While it is true the Business office does not have formal written performance measures, we support performance measures as a means of validating the effective performance of any department. The finance department has been working under and the boards have been aware of the current unwritten measures. In numerous years preceding and including FY '05, the audits of the districts contained numerous exceptions. It was agreed going forward a strong clear message was for the business office to eliminate all exceptions from the audits. The other main measurable was and continues to be to develop and pass all the district's annual budgets. This recommendation would be much simpler in its development under a consolidated district as described in MGT recommendations. We are in support of working with all the stakeholders to develop other measurable performance goals by convening a committee of stakeholders to develop such performance measures.

#### **RECOMMENDATION 5-5**

**The SVSU should document and implement formal procurement, surplus property, and accounting policies and internal controls along with detailed budget procedures.**

Accepted with clarification

The districts have detailed internal controls and accounting procedures which are reviewed and tested by our external auditors on a yearly basis. The business department

has a purchasing manual which has proven difficult to implement under the current governance structure. This recommendation would be much simpler in its implementation under a consolidated district as described in Recommendation 1-8.

### **RECOMMENDATION 5-6**

**The SVSU should consolidate all school districts and the supervisory union by converting into a single entity – a supervisory district – with one treasurer and governing board.**

Accepted with clarification

This is the same as Recommendation 1-8 and as stated before, the administration strongly supports this recommendation and will be happy to work with the boards and community to achieve it. The SVSU Board is required to discuss voluntary merger under Act 153.

### **RECOMMENDATION 5-7**

**The SVSU should continue its efforts to implement all BudgetSense modules.**

Accepted

The administration recognizes the value of technology as a tool to provide more effective, efficient service and information at a more affordable cost. The Business office will continue to implement and expand the use of BudgetSense.

### **RECOMMENDATION 5-8**

**The SVSU should enforce payroll deadlines.**

Accepted with clarification

The administration agrees with this recommendation. This recommendation would be much simpler in its implementation under a consolidated district as described in Recommendation 1-8.

### **RECOMMENDATION 5-9**

**The SVSU should strive to improve internal communications and accountability.**

Accepted with clarification

The administration agrees with this recommendation and recognizes this crosses all departments. Since communication is the number one goal of the superintendent, it is an area that is most important to the districts. This recommendation would be much simpler in its implementation under a consolidated district as described in Recommendation 1-8.

## **RECOMMENDATION 5-10**

**The SVSU should consider converting to semi-monthly payroll processing instead of bi-weekly.**

Accepted

This is a negotiated issue with the collective bargaining union that should be addressed during the next round of negotiations with the three unions.

## **RECOMMENDATION 5-11**

**The State of Vermont legislature should consider allowing employers to pay employees monthly.**

Referral to the Vermont Legislature

The administration supports this recommendation to the Vermont legislature.

## **Recommendation 5-12**

**The SVSU should continue its efforts to increase the number of staff paid through automatic deposit.**

Accepted

The administration supports this recommendation. This is a matter for collective bargaining within current collective bargaining agreements.

### **RECOMMENDATION 5-13**

**The SVSU should consider using purchasing co-operatives outside the SVSU, such as with other supervisory unions, school districts, and/or the state, to reduce prices paid for goods and services.**

Accepted with Clarification

The administration agrees with this recommendation. Purchasing cooperatives in the state of Vermont have not proven to be highly effective over the years and in fact when the SVSU recently went out to bid on the copier contract, one of the bidders secured the state purchasing price which was higher than that from our lowest bidder. With the current economic times, more cooperatives have begun to develop, and the administration will take advantage of those contracts which provide financial benefit to the districts.

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### **RECOMMENDATION 5-14**

**The SVSU should allow boards to approve some payments on a consent agenda.**

Accepted with Clarification

In a consolidated district, this recommendation would be possible. In the current structure, issuing check warrants weekly to ensure inclusion on consent agenda would make the work load unmanageable. Warrants would increase from 108 per year to 364 per year.

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### **RECOMMENDATION 5-15**

**The SVSU should implement a procurement card program for the schools and central office executive managers.**

Accepted with clarification

The administration has been researching best practices associated with Procurement Cards (P-Cards). This past August the MAU board approved the implementation of P-

Cards on a limited basis. As we better understand the best practices and controls necessary for proper implementation, the administration expects the program to grow within MAU and out to other districts.

### **RECOMMENDATION 5-16**

**The SVSU should consider sharing staff with other supervisory union business offices to handle peak workloads or using overtime or temporary staff as needed for peak workloads.**

Accepted with regard to overtime and temporary staff

Declined with regard to sharing employees with other SUs.

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The administration currently utilizes temporary workers and overtime when prudent. Sharing other SU employees for peak workloads would be difficult when all SU's are on the same cyclical schedule. Our peak is their peak. This is not advised.

### **RECOMMENDATION 5-17**

**The SVSU should hire an additional Medicaid clerk.**

Accepted

### **RECOMMENDATION 5-18**

**The SVSU should implement a Medicaid claims eligibility and claims tracking and monitoring system and enforce internal compliance with Medicaid program needs.**

Accepted

## 6.0 Facilities Use and Management

### RECOMMENDATION 6-1

**The SVSU should consolidate custodial and maintenance functions throughout the SVSU and develop a staffing plan based on industry standards.**

Accepted with clarification

The administration agrees with this recommendation and would be happy to work with the boards and staff for implementation in FY13. This recommendation would be much simpler in its implementation under a consolidated district as described in Recommendation 1-8.

### RECOMMENDATION 6-2

**The SVSU should develop and implement a comprehensive, long-range facility master plan.**

Accepted with clarification

The administration agrees with this recommendation and would be happy to work with the boards and staff for implementation. This recommendation would be much simpler in its implementation under a consolidated district as described in Recommendation 1-8.

### RECOMMENDATION 6-3

**The SVSU should create prekindergarten programs in Pownal, Bennington, and Woodford schools and school districts.**

Accepted with clarification.

It is important to note that ACT 62 (Rule 2603) requires school districts to conduct a community discussion and needs assessment prior to establishing or expanding prekindergarten education. In the spirit of ACT 62, partnerships with community child care providers who meet quality standards (Rule 2604) and have capacity to enroll and serve additional children must be considered as an option in which to provide public prekindergarten services.

## **RECOMMENDATION 6-4**

**The SVSU should rezone all sixth grade students to Mount Anthony Union Middle School.**

Accepted with clarification

The administration believes that all sixth grade students should be at the middle school to take advantage of the facility and to allow for enhancement of the curriculum for all SVSU students. The administration also recognizes that there is a financial impact for districts whose students attend the middle school. Under a consolidated governance structure, the fiscal impact would be mitigated by balancing student enrollment all of the elementary K-5 schools.

## **RECOMMENDATION 6-5**

**The SVSU should provide a choice option for all kindergarten through fifth grade students from Woodford Elementary School, close Woodford as an operating elementary school , and explore the feasibility of converting Woodford to an alternate use facility such as a prekindergarten center, library, or community center.**

**Closure of the Woodford School is declined as a recommendation**

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Consolidation would meet the urgent goal of the most rural of the member districts to sustain their schools by eliminating or redefining district boundaries for student attendance, as these schools are and represent the “heart” of their communities.

## 7.0 Food Services Management

### RECOMMENDATION 7-1

**The SVSU should continue outsourcing food services.**

Accepted

### RECOMMENDATION 7-2

**The SVSU should administer satisfaction surveys regularly so school food advisory councils have ongoing feedback regarding food service.**

Accepted with clarification

The administration agrees with this recommendation. The district's current food service management contract expires June 30, 2011. The district's Food Service Advisory Committee (FSAC) is currently working on the drafting and implementation of a Request for Proposal for a new contract to run from July 1, 2011 to June 30, 2016. Once the new contract is awarded, the FSAC will begin to develop a comprehensive satisfaction survey to evaluate the delivery of service.

### RECOMMENDATION 7-3

**The SVUS should seek to increase student breakfast participation.**

Accepted with clarification

The Food Service Advisory Committee has been meeting regularly on the first and third Thursday of each month since August, 2010. There have been discussions about increasing all participations and in particular breakfast. These discussions will continue with recommendations and results being reported to the board in the future.

#### **RECOMMENDATION 7-4**

**The SVSU should increase the cost of its elementary student lunches by \$0.25 per meal and secondary lunches by \$0.20 per meal.**

Will be taken under advisement

The administration recognizes the justification for the potential increases; however based on the current economic environment and the socioeconomic situation of our population, the administration believes more research and thought should go into this recommendation.

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#### **RECOMMENDATION 7-5**

**The SVSU should increase the cost of its adult lunches by \$0.25 per meal.**

Accepted

### **8.0 Technology Management**

#### **Recommendation 8-1**

**The SVSU should hire a new Director of Technology as soon as possible.**

Accepted with clarification

A committee has been formed to recruit and interview for a Director of Technology. The committee has recommended a revised job description which would separate the instructional applications and technological management functions.

## **RECOMMENDATION 8-2**

**The SVSU should establish technology competency standards as part of teacher requirements and provide technology training for teachers.**

Accepted with clarification

This finding relates to the current governance structure. The supervisory union cannot set requirements in areas where there have been no agreements for a unified approach by the member districts. However, that does not preclude the individual Principals from setting a technology expectation when interviewing potential hires.

Training in technology is offered to teachers on a regular basis. Continued training should and will be provided.

## **RECOMMENDATION 8-3**

**The SVSU should develop a timeline for updating the SVSU website.**

Accepted with implementation

An implementation schedule is being set

## **RECOMMENDATION 8-4**

**The SVSU should formally evaluate the net-books initiative and determine the educational value of this technology.**

Accepted with clarification

Program evaluation is accepted as a necessary component of any programmatic initiative. The value of this program was well established before implementation and has already proven so.

## 9.0 Transportation

### RECOMMENDATION 9-1

**The Pownal School District should utilize and seek inclusion within the master transportation contract.**

Accepted with referral to the Pownal School District Board of Directors

### RECOMMENDATION 9-2

**Pownal School District should sell unused school buses once it implements recommendations to join in the SVSUs master transportation services contract.**

Accepted with referral to the Pownal School District Board of Directors

### RECOMMENDATION 9-3

**Include the Shaftsbury School District in the SVSU master transportation services contract.**

Accepted with referral to the Shaftsbury School District Board of Directors

### RECOMMENDATION 9-4

**The SVSU should procure an outside contractor to provide transportation services for students with disabilities and/or in special situations – to reduce its liability and insurance risks.**

Implementation plans set previously and completed summer 2010

This potential liability was identified prior to MGT's Performance Audit. This recommendation was implemented on July 1, 2010.