



MISSISSIPPI  
DEPARTMENT OF  
EDUCATION

Ensuring a bright future for every child

Office of Accountability  
Paula A. Vanderford, Ph.D., Chief

Office of Accreditation  
Jo Ann Malone, Ed.D., Executive Director

July 13, 2018

Mr. Roger Liddell, Superintendent  
Noxubee County School District  
15867 Highway 14 West  
Macon, MS 39341

**VIA HAND DELIVERY**

Mr. Albert Williams, Chair  
Noxubee County School Board  
15867 Highway 14 West  
Macon, MS 39341

Dear Mr. Liddell and Mr. Williams:

Enclosed is the *On-Site Investigative Audit Report* the Mississippi Department of Education (MDE) conducted in the Noxubee County School District (NCSD) June 25 through July 3, 2018. The investigative audit included an evaluation of accreditation standards and accountability requirements of the State Board of Education. All findings described in the enclosed report are based on the analysis of data collected during the on-site evaluation, including (a) interviews conducted with NCSD staff, (b) observations and completed evaluation forms, (c) analysis of official documentation on file in the NCSD, and (d) analysis of official reports submitted to the MDE.

Based on the audit findings, the NCSD is in violation of 26 out of 32 Process Standards that include the following: 1, 1.1, 1.2, 1.3, 2, 2.2, 2.3, 2.4, 3, 3.2, 3.3, 3.4, 4, 4.2, 4.4, 4.5, 4.6, 4.7, 5, 5.1, 6, 6.1, 6.2, 6.3, 7, 8, 9, 10, 10.1, 11, 12, 12.1, 12.2, 13, 13.1, 13.2, 13.3, 13.4, 13.5, 14, 14.1, 14.2, 14.5, 15, 17, 17.1, 17.2, 17.3, 17.4, 17.5, 17.5.1, 17.6, 17.8, 18, 18.1, 18.2, 19, 19.1, 19.2, 20, 20.1, 20.2, 21, 21.1, 21.2, 22, 26, 29, 29.1, 29.2, 29.4, 30, and 31. In addition to the violations noted above, the NCSD is noncompliant with Accreditation Policy 2.1. Based on a detailed analysis of the 2017-2018 Personnel/Accreditation Data Report submitted to the MDE and official documentation on file in the NCSD, the District failed to report complete and accurate data to the MDE.

The MDE found the NCSD in compliance with Process Standards 2.1, 2.5, 3.1, 4.1, 4.3, 5.2, 16, 17.7, 24, 24.1, 24.2, 25, 28, 28.1, 28.2, 28.3, 28.4, 28.5, 32, 32.1, and 32.2.

The MDE did not evaluate Process Standards 14.1.4, 14.3, 14.4, 23, 27, 27.1, 27.2, 27.3, and 29.3.

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359 North West Street  
P.O. Box 771  
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Mr. Liddell and Mr. Williams

July 13, 2018

Page Two (2)

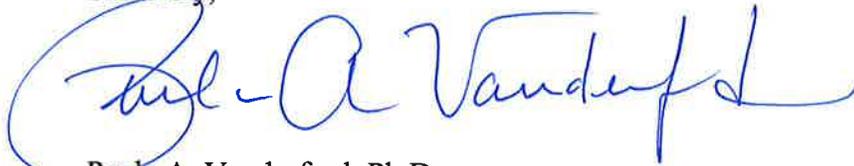
The MDE Office of Accreditation will present evidence to the Commission on School Accreditation, which will determine whether an extreme emergency exists in the NCSD that jeopardizes the safety, security, or educational interests of the children enrolled in the schools in the District. In accordance with Miss. Code Ann. § 37-17-6(12)(b), the Commission will determine if such an emergency situation is related to serious violation(s) of federal and state law and accreditation standards, serious concerns regarding financial resources, and a continued pattern of poor academic performance. The Commission meeting will begin at 1:00 p.m. on Wednesday, July 18, 2018, in the Fourth Floor Board Room of the Central High School Building in Jackson, Mississippi.

District representatives, which shall include, but are not limited to, the Superintendent and the Board Chair, will be allowed to address the Commission prior to the Commission's determination. While the District may be represented by counsel, only district employees and/or board members may address the Commission during the 40 minutes allowed for the District to present evidence pertinent to this matter. This time may not be delegated to anyone else. Following the presentations from the Office of Accreditation and the District, the attorney for the District (if applicable) and the attorney for the MDE will be allowed 10 minutes each to provide closing statements.

If the Commission makes any recommendation(s) at this meeting, the recommendation(s) will be presented to the State Board of Education at the regularly scheduled meeting on July 19, 2018, at 10:00 a.m. in the Fourth Floor Board Room of the Central High School Building, in Jackson, Mississippi. The State Board of Education will follow the same format as the Commission in allowing the District and the MDE to address the Board prior to the Board's determination.

Your cooperation and the assistance of all school district employees are greatly appreciated. If you have any questions related to the enclosed report or accreditation requirements, please contact me at (601) 359-3764.

Sincerely,



Paula A. Vanderford, Ph.D.  
Chief Accountability Officer

Enclosure

c: Carey M. Wright, Ed.D.  
Special Assistant Attorney General



**On-Site Investigative Audit Report**

**Noxubee County School District (5200)**

**June 25, 2018 – July 3, 2018**

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## TABLE OF CONTENTS

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# NOXUBEE COUNTY SCHOOL DISTRICT ON-SITE INVESTIGATIVE AUDIT REPORT

**History of Performance**

**Compliance Summary**

**Accreditation Policy 2.1: Data Reporting**

**Accreditation Standards**

**Standard 1: Governance**

**Standard 2: Licensed Staff**

**Standard 3: Personnel Appraisal**

**Standard 4: Financial Accountability**

**Standard 5: Budget and Expenditures**

**Standard 6: Enrollment Requirements**

**Standard 7: Transfer Policies**

**Standard 8: Student Records**

**Standard 9: Strategic Planning Process**

**Standard 10: Compulsory School Attendance**

**Standard 11: Dropout Prevention Plan and Program of Services**

**Standard 12: Community Involvement: P-16 Councils**

**Standard 13: Calendar Days and Instructional Requirements**

**Standard 14: Graduation Requirements**

**Standard 15: Professional Development Plan/Program**

**Standard 16: Statewide Assessment System**

**Standard 17.1: Early Childhood Programs (Kindergarten)**

**Standard 17.2: Pre-Kindergarten Programs**

**Standard 17.3: Career-Technical Education Program**

**Standard 17.4: Special Education Program**

**Standard 17.5: Child Nutrition/School Wellness**

**Standard 17.6: *Elementary and Secondary Education Act***

**Standard 17.7: Driver Education**

**Standard 17.8: Gifted Education Program**

**Standard 18: Library/Media Center and Services**

**Standard 19: Textbook Requirements**

**Standard 20: Instructional Management System**

**Standard 21: Promotion, Retention, and Uniform Grading Policy**

**Standard 22: Alternative Education Program**

**Standard 23: GED Option**

**Standard 24: Unencumbered Planning Time**

**Standard 25: Limit on Course Preparations**

**Standard 26: Basic Secondary Curriculum Requirements**

**Standard 27: Implementation of the Basic Elementary Curriculum in Grades K-8**

**Standard 28: Student Teacher Ratios**

**Standard 29: Pupil Transportation Program**

**Standard 30: School District Facilities**

**Standard 31: School Safety Plan and Implementation**

**Standard 32: Youth Detention Center**

**Attachments**

**Attachment A: Letter from the Noxubee County School District Superintendent**

**Attachment B: State Auditor's Report (December 5, 2013)**

**Attachment C: Individual Student Report (CONFIDENTIAL)**

**Attachment D: (PULLED)**

**Attachment E: Bus Fleet Inspection Report**

**Attachment F: School Facility Report**

**Attachment G: School Safety Report**

Mississippi Statewide Accountability System  
History of Performance  
Noxubee County School District (5200)

Accountability Component	Performance Classification					Graduation Rate					Proficiency					Growth All					Growth Low 25%							
	2013	2014	2015	2016	2017	2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016	2017
<b>Year</b>	2013	2014	2015	2016	2017	2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016	2017
<b>District</b>	F	D	D	F	F	65.2	71.3	78.5	72	83.1	ELA	Not Met	43.7	31.9	17.8	17.9	ELA	Not Met	54	62.9	38.1	47.2	ELA	N/R	50.9	72.3	51.5	54.8
											MTH	Not Met	55.9	20	14.5	15.3	MTH			66.1	39.2	43.4	36.2	MTH	N/R	55.9	49.6	57.2
<b>State</b>	N/R	C	C	C	C	75.5	74.5	78.4	80.8	82.3	ELA	N/R	56	38.3	29.9	32.9	ELA	N/R	N/R	58.3	56.9	58.7	ELA	N/R	N/R	65.5	63.7	61.9
											MTH	N/R	61.7	31.7	30.5	33.5	MTH			N/R	46.8	60.6	59.5	MTH	N/R	N/R	54.8	66.4

**Notes:**

- Different assessments were given in 2014-2016. MCT2 in 2014, PARCC in 2015, and MAAP in 2016.
- In assigning grades, both growth and proficiency are considered.
- 2013 used a different accountability model that reported whether or not performance objectives were met.
- ELA and MTH were combined in growth measurements in 2013.

**Definitions:**

Growth All - Weighted percentage of all students meeting growth

Growth Low 25% - Weighted percentage of students in the Lowest 25% subgroup meeting growth

ELA - English/Language Arts assessments

MTH - Mathematics assessments

N/R - Not Reported

Mississippi Statewide Accountability System  
History of Performance  
Noxubee County School District (5200)

Elementary Schools

Accountability Component	Performance Classification					Proficiency					Growth All					Growth Low 25							
	Year	2013	2014	2015*	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016
Earl Nash Elementary School	C	C	C(w), D(w/o)	D	F	ELA	Met	62.2	32.6	21.7	18.5	ELA	Met	68.5	53.9	50.8	40.5	ELA	N/R	63.6	75.5	71.4	55.4
						MTH	Met	72.2	29.1	15.4	21.2	MTH		67.9	48.5	33.9	21.6	MTH	N/R	67.5	32.7	70.0	16.8
B F Liddell Elementary School	F	F	D	F	F	ELA	Met	30.1	25.4	14.6	20.9	ELA	Not Met	38.5	46.6	30.5	42.7	ELA	N/R	49.4	60.0	40.0	37.0
						MTH	Met	35.6	23.1	15.8	10.5	MTH		45.9	32.6	45.2	30.1	MTH	N/R	45.6	35.3	59.0	58.1
Virgil Jones, Jr. (Wilson) Elementary School	D	D	C	F	F	ELA	Not Met	38.6	31.5	13.9	16.4	ELA	Not Met	48.6	72.5	33.3	44.3	ELA	N/R	51.9	84.3	55.6	39.4
						MTH	Not Met	47.6	20.1	16.7	16.4	MTH		61.4	41.7	48.4	31.8	MTH	N/R	38.6	62.1	54.7	41.8

**Notes:**

- \*If the school benefited from a waiver when assigning the grade, it is noted as the grade (w) with or (w/o) without waiver. The waiver only applied in 2014 and 2015.
- Different assessments were given in 2014-2016. MCT2 in 2014, PARCC in 2015, and MAAP in 2016.
- In assigning grades, both growth and proficiency are considered.
- 2013 used a different accountability model that reported whether or not performance objectives were met.
- ELA and MTH were combined in growth measurements in 2013.

**Definitions:**

- Growth All - Weighted percentage of all students meeting growth
- Growth Low 25% - Weighted percentage of students in the Lowest 25% subgroup meeting growth
- ELA - English/Language Arts assessments
- MTH - Mathematics assessments
- N/R - Not Reported

Mississippi Statewide Accountability System  
History of Performance  
Noxubee County School District (5200)

Middle Schools

Accountability Component	Performance Classification					Proficiency						Growth All					Growth Low 25%						
	Year	2013	2014	2015*	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016
B F Liddell Middle School	F	C	C(w), D(w/o)	F	F	ELA	Not Met	46.2	36.3	15.5	13.9	ELA	Not Met	60.6	67.0	32.1	46.7	ELA	N/R	54.3	70.9	41.7	56.6
						MTH	Not Met	65.9	11.3	13.9	12.9	MTH		81.7	34.7	45.4	36.5	MTH	N/R	68	58.8	62.3	48.4

**Notes:**

\*If the school benefited from a waiver when assigning the grade, it is noted as the grade (w) with or (w/o) without waiver. The waiver only applied in 2014 and 2015.

- Different assessments were given in 2014-2016. MCT2 in 2014, PARCC in 2015, and MAAP in 2016.
- In assigning grades, both growth and proficiency are considered.
- 2013 used a different accountability model that reported whether or not performance objectives were met.
- ELA and MTH were combined in growth measurements in 2013.

**Definitions:**

Growth All - Weighted percentage of all students meeting growth

Growth Low 25% - Weighted percentage of students in the Lowest 25% subgroup meeting growth

ELA - English/Language Arts assessments

MTH - Mathematics assessments

N/R - Not Reported

Mississippi Statewide Accountability System  
History of Performance  
Noxubee County School District (5200)

High Schools

Accountability Component	Performance Classification					Graduation Rate					Proficiency					Growth All					Growth Low 25%							
	Year	2013	2014	2015	2016	2017	2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		2013	2014	2015	2016
Noxubee County High School	F	D	D	F	C	65.2	71.3	79.2	73.9	83.1	ELA	Not Met	36.7	31.3	26.1	24.5	ELA	Not Met	53.9	74.5	49.1	65.1	ELA	N/R	37.2	63	65.3	80.8
											MTH	Not Met	55.2	19.4	20.9	16.3	MTH			66.2	47.8	35.2	67.3	MTH	N/R	40	50	40

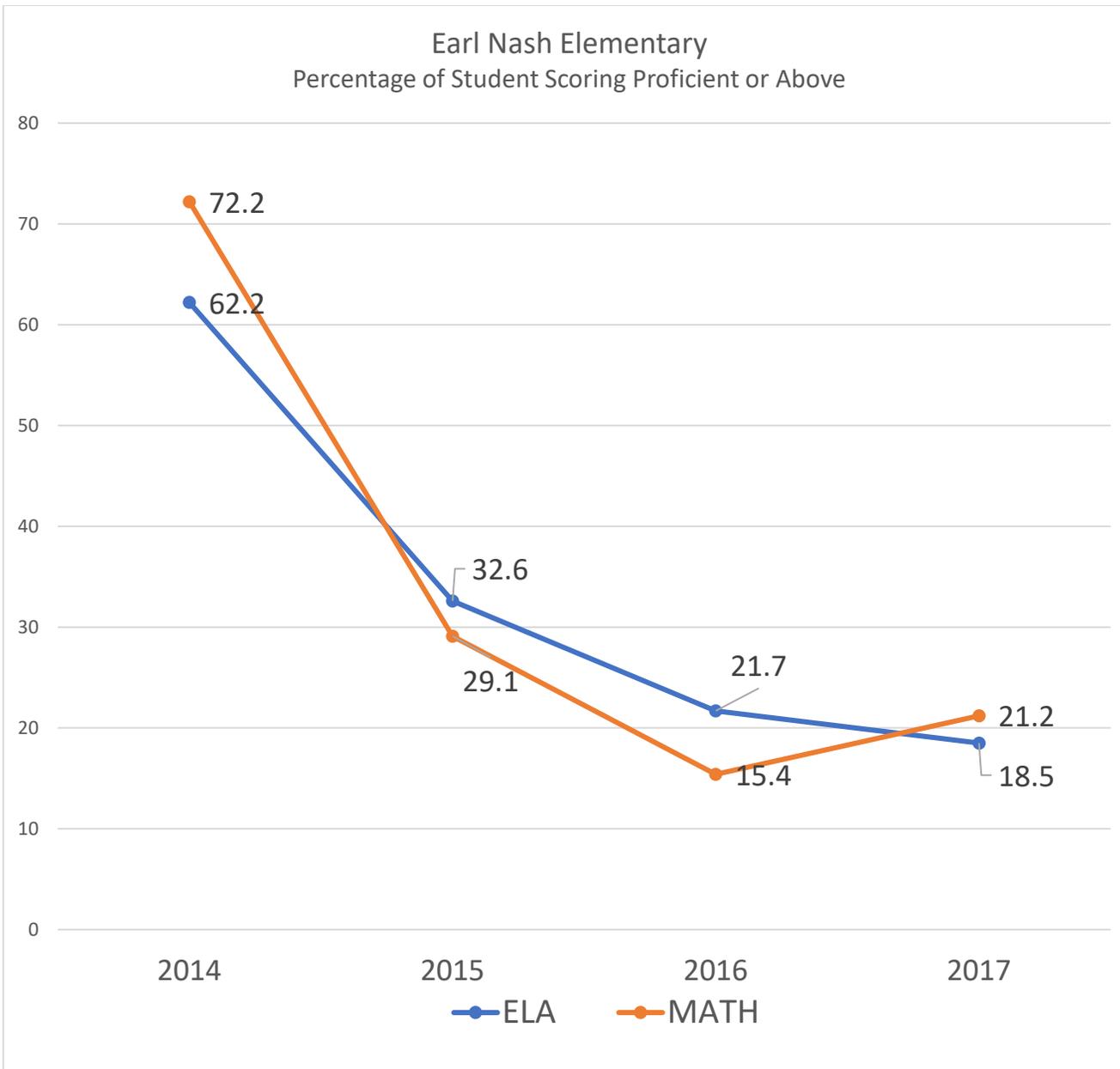
**Notes:**

- Different assessments were given in 2014-2016. MCT2 in 2014, PARCC in 2015, and MAAP in 2016.
- In assigning grades, both growth and proficiency are considered.
- 2013 used a different accountability model that reported whether or not performance objectives were met.
- ELA and MTH were combined in growth measurements in 2013.

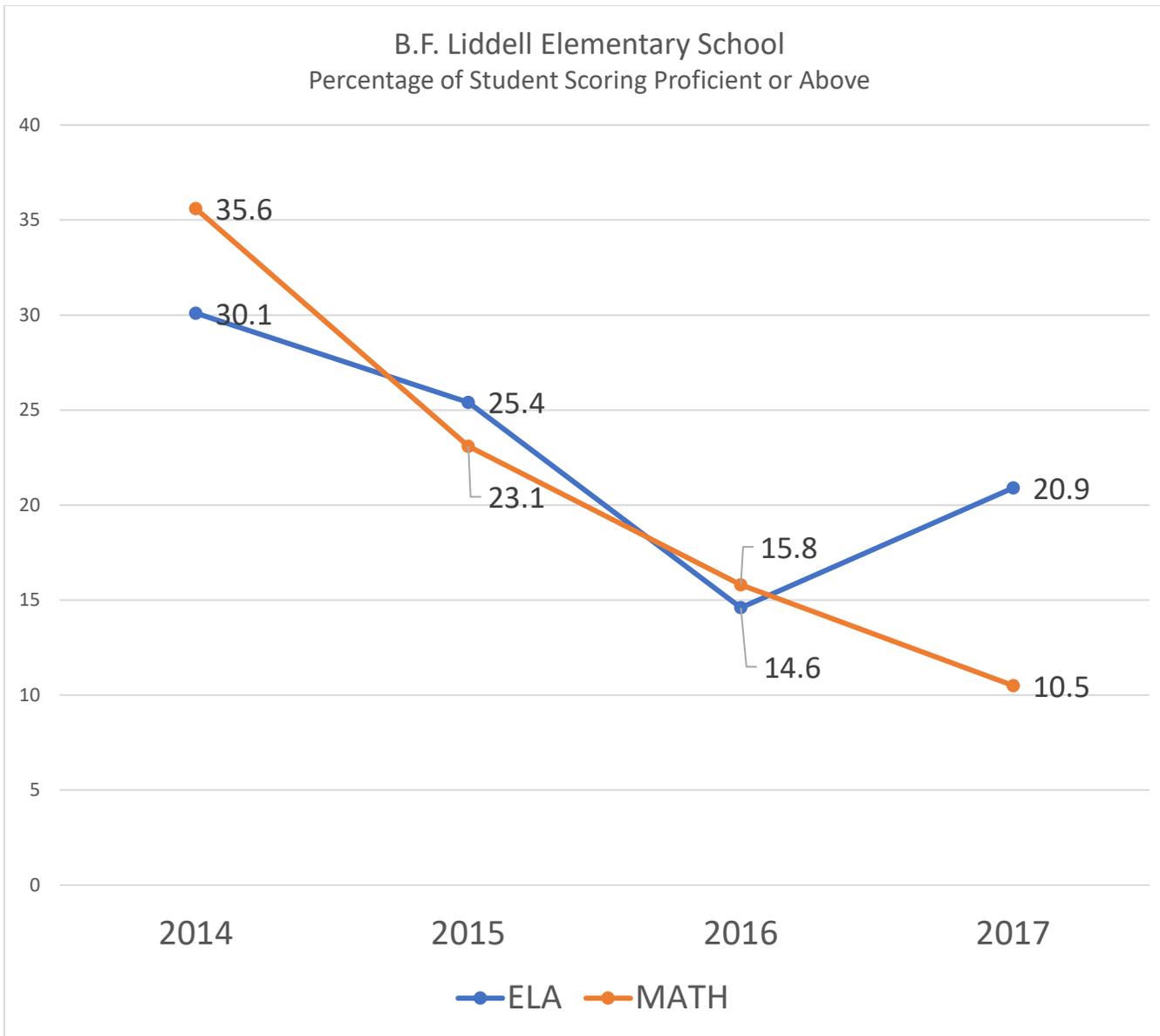
**Definitions:**

Growth All - Weighted percentage of all students meeting growth  
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 ELA - English/Language Arts assessments  
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 N/R - Not Reported

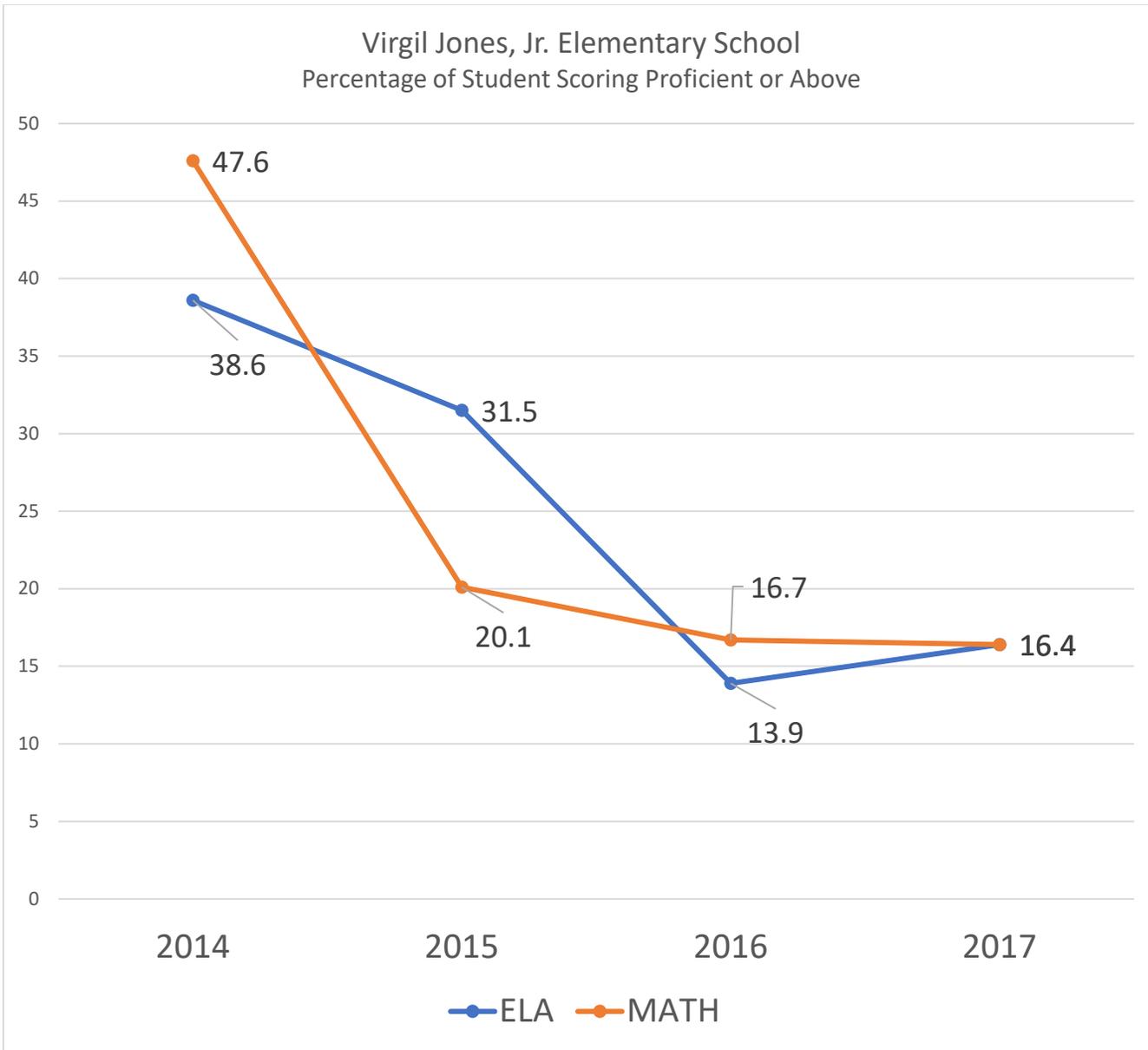
Earl Nash Elementary  
Percentage of Student Scoring Proficient or Above

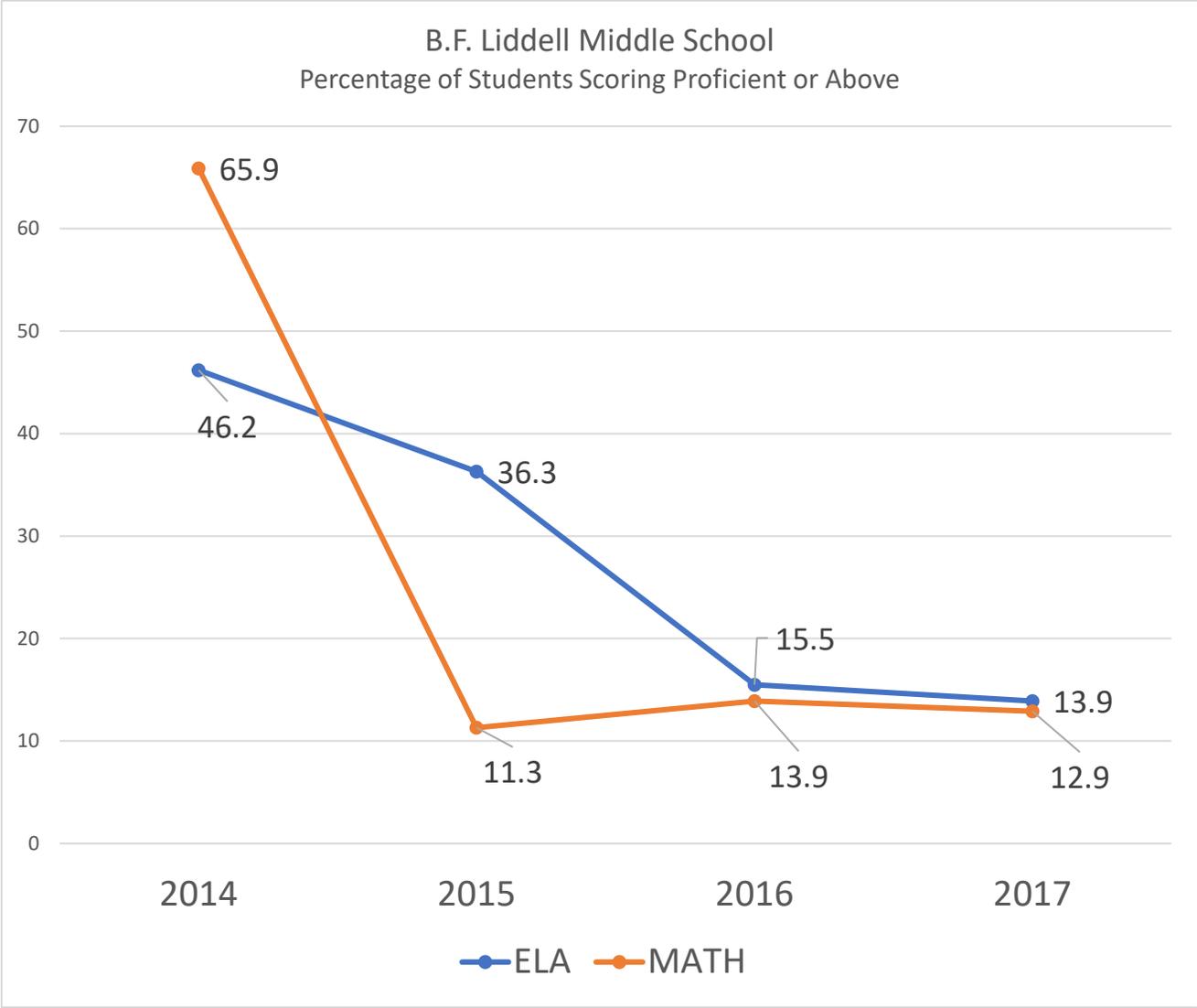


B.F. Liddell Elementary School  
Percentage of Student Scoring Proficient or Above

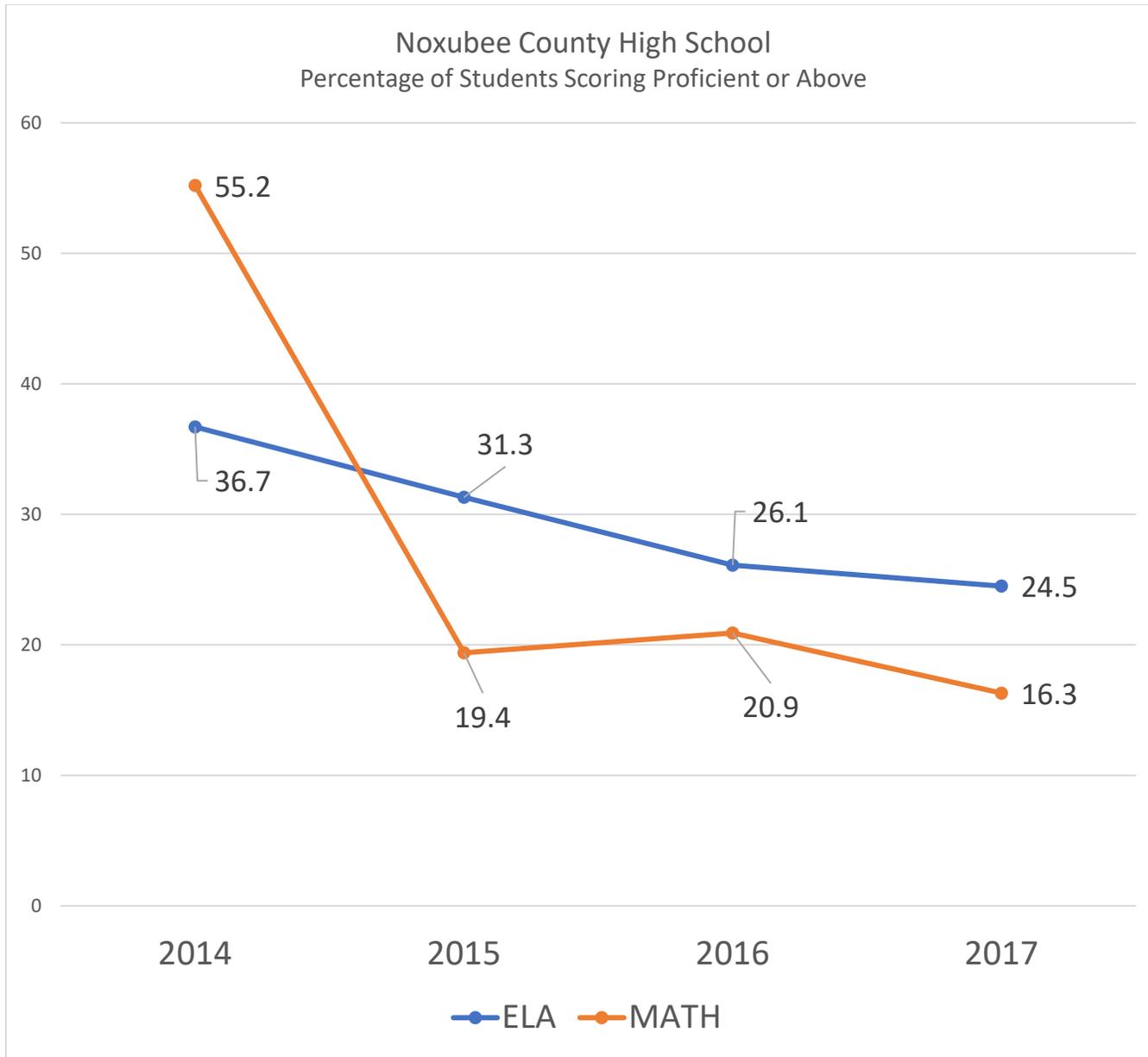


Virgil Jones, Jr. Elementary School  
Percentage of Student Scoring Proficient or Above

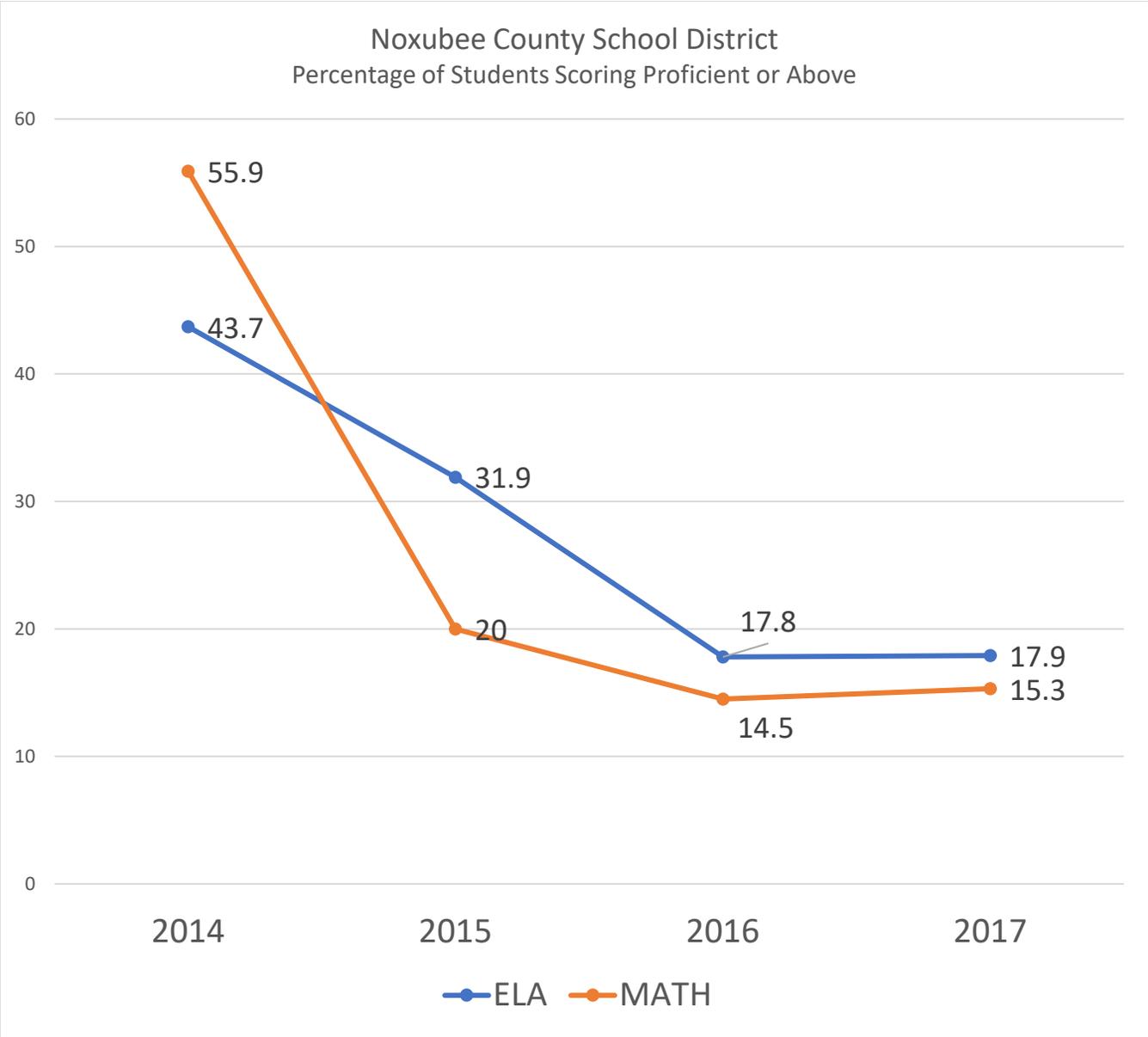




Noxubee County High School  
Percentage of Students Scoring Proficient or Above



Noxubee County School District  
Percentage of Students Scoring Proficient or Above



**SUMMARY OF COMPLIANCE WITH  
ACCOUNTABILITY REQUIREMENTS AND ACCREDITATION STANDARDS  
NOXUBEE COUNTY SCHOOL DISTRICT**

**JUNE 25, 2018 – JULY 3, 2018**

POLICY/ STANDARD	AREA EVALUATED	SUMMARY OF FINDINGS
Policy 2.1	Data Reporting	<ul style="list-style-type: none"> <li>Based on a review of the 2017-2018 MSIS Personnel/Accreditation Data Report and supporting documentation on file in the District, the Superintendent failed to ensure that all data reported to the Mississippi Department of Education (MDE) is true and accurate.</li> <li>District staff members have been asked by the superintendent and district leadership to falsify documentation.</li> </ul>
Standards 1 and 1.1	Governance: Superintendent Administrative Duties	<ul style="list-style-type: none"> <li>The Superintendent failed to provide effective educational leadership in key areas including management of district personnel, effective implementation of policies, and the development of Board and community relations.</li> </ul>
Standards 1 and 1.2	Governance: School Board Policies	<ul style="list-style-type: none"> <li>Board policies do not serve as the basis of operation for the District.</li> </ul>
Standards 1 and 1.3	Governance: Local School Board	<ul style="list-style-type: none"> <li>The Board failed to effectively perform its duties in its role of oversight of management for the District as prescribed by law.</li> <li>The Board failed to operate the District in accordance with current Board policies.</li> <li>The Board failed to ensure that it provided proper governance and leadership in the District.</li> </ul>
Standard 2.0	Licensed Staff	<ul style="list-style-type: none"> <li>For the 2017-2018 school year, 30.12 (or 28.91%) of the 104.17 Full Time Equivalencies positions were held by individuals who did not hold a valid Mississippi Teacher's License or lacked proper endorsements for the subject they taught.</li> </ul>
Standard 2.1	Full-time Principals	<ul style="list-style-type: none"> <li><b>The District is compliant with Process Standard 2.1.</b></li> </ul>
Standard 2.2	More Than 5% Professional Staff Working Out-of-Field	<ul style="list-style-type: none"> <li>Thirty (30.12) Full Time Equivalent (FTEs) of the 104.17 teachers employed in the Noxubee County District during School Year 2017-2018 worked outside of the area(s) of endorsement.</li> </ul>
Standard 2.3	Licensed Librarians	<ul style="list-style-type: none"> <li>Librarians serve in multiple capacities, which prevent librarians from fulfilling their role as either a half-time or full-time librarian.</li> </ul>
Standard 2.4	Student Support Services	<ul style="list-style-type: none"> <li>The District failed to meet minimum requirements for providing support services to students.</li> </ul>
Standard 2.5	School Business Officer	<ul style="list-style-type: none"> <li><b>The District is compliant with Process Standard 2.5.</b></li> </ul>
Standards 3, 3.1, 3.2, 3.3, and 3.4	Personnel Appraisal System	<ul style="list-style-type: none"> <li><b>The District is compliant with Process Standard 3.1.</b></li> <li>The District is noncompliant is Process Standards 3, 3.2, 3.3 and 3.4.</li> </ul>

POLICY/ STANDARD	AREA EVALUATED	SUMMARY OF FINDINGS
		<ul style="list-style-type: none"> <li>• The Superintendent utilizes his own evaluation system to evaluate the principals rather than the Mississippi Administrator Professional Growth System.</li> <li>• The <i>Mississippi School Librarian Growth Rubric</i> is not used to evaluate school librarians.</li> <li>• The <i>Mississippi Counselor Growth Rubric</i> is not used to evaluate counselors.</li> </ul>
Standard 4	Annual Financial Audit	<ul style="list-style-type: none"> <li>• Based on the most recent report from the Office of the State Auditor, the District failed to obtain an annual financial audit, as conducted under the guidelines of the Office of the State Auditor, no later than nine (9) months after the end of the District’s fiscal year.</li> </ul>
Standard 4.1	Fixed Asset System of Accountability	<ul style="list-style-type: none"> <li>• <b>Based on the most recent report from the Office of the State Auditor, the District is compliant with Process Standard 4.1.</b></li> </ul>
Standard 4.2	Zero Fund Balance	<ul style="list-style-type: none"> <li>• Based on the most recent report from the Office of the State Auditor, the District failed to indicate no less than a zero fund balance for all funds of the District.</li> </ul>
Standard 4.3	Procurement Cards	<ul style="list-style-type: none"> <li>• <b>Based on the most recent report from the Office of the State Auditor, the District is compliant with Process Standard 4.3: Procurement Cards.</b></li> </ul>
Standard 4.4	Unqualified Opinion	<ul style="list-style-type: none"> <li>• Based on the most recent report from the Office of the State Auditor, the District failed to indicate an unqualified opinion on the financial statements of the District.</li> </ul>
Standard 4.5	Financial Reports	<ul style="list-style-type: none"> <li>• Based on the most recent report from the Office of the State Auditor, the District failed to verify the Board has received, reviewed, and discussed as reflected in official minutes of the regularly scheduled monthly meeting, the financial reports required by state law and/or the State Board of Education.</li> </ul>
Standard 4.6	Reporting Financial Data	<ul style="list-style-type: none"> <li>• Based on the most recent report from the Office of the State Auditor, the District failed to verify the accuracy and timely compilation and reporting of all financial data, including the year-end data provided through the Financial Exchange Transfer System (FETS), required for submission to the MDE by the fifteenth (15<sup>th</sup>) day of October, each year, in accordance with state law and/or the State Board of Education.</li> </ul>
Standard 4.7	7% Fund Balance	<ul style="list-style-type: none"> <li>• Based on the most recent report from the Office of the State Auditor, the District failed to verify a 7% fund balance of the District maintenance fund.</li> </ul>
Standards 5 and 5.1	Annual Budget	<ul style="list-style-type: none"> <li>• Based on the most recent report from the Office of the State Auditor, the Board failed to submit the annual budget to the levying authority and the prescribed budgetary information to the MDE by the fifteenth (15<sup>th</sup>) day of August, each year, in accordance with state law and/or the SBE.</li> </ul>
Standards 5 and 5.2	Public School Health Insurance Plan	<ul style="list-style-type: none"> <li>• <b>Based on the most recent report from the Office of the State Auditor, the District is compliant with Process Standard 5.2: Public School Health Insurance Plan.</b></li> </ul>
Standards 6 and 6.1	Residency Verification	<ul style="list-style-type: none"> <li>• Four (4) of the five (5) schools audited failed to provide the required residency documentation.</li> </ul>

POLICY/ STANDARD	AREA EVALUATED	SUMMARY OF FINDINGS
Standards 6 and 6.2	Immunization Requirements	<ul style="list-style-type: none"> <li>• Three (3) of the five (5) schools audited failed to provide the required immunization documentation.</li> </ul>
Standards 6 and 6.3	Age of Entry Requirements	<ul style="list-style-type: none"> <li>• The District's Board policies and student handbooks are not current.</li> </ul>
Standard 7	Transfer Policies and Procedures	<ul style="list-style-type: none"> <li>• The District's Board policies and student handbooks are not current.</li> </ul>
Standard 8	Student Records	<ul style="list-style-type: none"> <li>• Three (3) elementary schools, one (1) middle school, and one (1) high school failed to maintain records in accordance with the <i>Mississippi Cumulative Folders and Permanent Records Manual of Directions</i>.</li> </ul>
Standard 9	Implementation of a Continuous Strategic Planning Process	<ul style="list-style-type: none"> <li>• The District failed to provide a current Board approved Strategic Plan.</li> </ul>
Standard 10	Compulsory School Attendance	<ul style="list-style-type: none"> <li>• Noxubee County High School failed to comply with procedures for monitoring and reporting student absences as specified in the Mississippi Compulsory School Attendance Law.</li> </ul>
Standard 10.1	Accuracy, Validity, and Timely Reporting of Student Data	<ul style="list-style-type: none"> <li>• Based on the most recent report from the Office of the State Auditor, the District failed to verify the accuracy, validity, and timely reporting of all student data submitted to the MDE, including, but not limited to, the electronic transmission of student enrollment, attendance, transportation, absenteeism, graduation, dropouts, and any other student data and administrative functions as deemed necessary.</li> </ul>
Standard 11	Dropout Prevention Plan and Program of Services	<ul style="list-style-type: none"> <li>• The District failed to post a District-wide Dropout Prevention Plan on the District's website.</li> <li>• The District failed to produce Board minutes indicating that a District-wide Dropout Prevention Plan has been approved.</li> </ul>

POLICY/ STANDARD	AREA EVALUATED	SUMMARY OF FINDINGS
Standards 12, 12.1, and 12.2	Community Involvement, Parental Communication, and Business Partnerships	<ul style="list-style-type: none"> <li>The District was unable to provide documented evidence to substantiate an active P-16 Community Engagement Council.</li> </ul>
Standard 13	180 Teaching Days	<ul style="list-style-type: none"> <li>Based on conflicting information provided by the District, auditors were unable to verify that the calendar approved by the Board for the 2017-2018 school year provided 180 school days for all students.</li> </ul>
Standard 13.1	Instructional Time	<ul style="list-style-type: none"> <li>Based on conflicting information provided by the District, auditors were unable to verify that the school schedules contained the minimum required 330 minutes per day of instruction.</li> </ul>
Standard 13.2	Instructional Time for Carnegie Unit Credit	<ul style="list-style-type: none"> <li>The District failed to publish current Board policies and student handbooks containing information related to earning Carnegie unit credits.</li> </ul>
Standard 13.3	60% Days	<ul style="list-style-type: none"> <li>Based on conflicting information provided by the District, the auditors were unable to verify that no more than two (2) of the 180 days were 60% days.</li> </ul>
Standard 13.4	Required Attendance for Seniors and Preparation for Graduation Ceremonies	<ul style="list-style-type: none"> <li>The District held graduation ceremonies for Noxubee County High School prior to the last day of school.</li> </ul>
Standard 13.5	Summer School and Extended Year Programs	<ul style="list-style-type: none"> <li>The summer school/extended school year information report to the MDE in MSIS does not meet the minimum instructional time to earn the Carnegie unit credit(s).</li> <li>The District has failed to publish current Board policies and student handbooks containing information related to summer school/extended year programs.</li> </ul>
Standard 14	Graduation Requirements	<ul style="list-style-type: none"> <li>The District failed to ensure all students at Noxubee County High School met the graduation requirements established by the District's Board and the State Board of Education.</li> </ul>
Standard 14.1	Minimum Carnegie Unit Requirements	<ul style="list-style-type: none"> <li>Two (2) graduates at Noxubee County High School failed to meet the minimum number of Carnegie units required for graduation.</li> </ul>
Standard 14.1.4	Individualized Career and Academic Plan (iCAP)	<ul style="list-style-type: none"> <li>The MDE was unable to verify compliance after two (2) unsuccessful attempts to meet with the counselor.</li> </ul>
Standard 14.2	High School Exit Exams	<ul style="list-style-type: none"> <li>The District allowed 22 students from Noxubee County High School to graduate despite having failed to achieve a passing score, or meet one of the alternative criteria, on each of the required end-of-course assessments.</li> </ul>
Standard 14.3	Special Diploma or Certificate	<ul style="list-style-type: none"> <li>The Office of Special Education could not audit Process Standards 14.3 due to time restrictions.</li> </ul>
Standard 14.4	Mississippi Occupational Diploma	<ul style="list-style-type: none"> <li>The Office of Special Education could not audit Process Standards 14.4 due to time restrictions.</li> </ul>

POLICY/ STANDARD	AREA EVALUATED	SUMMARY OF FINDINGS
Standard 14.5	Participation in Graduation Ceremonies	<ul style="list-style-type: none"> <li>• Of the 118 graduating seniors listed on the commencement program for School Year 2017-2018, 24 students failed to meet graduation requirements. The District allowed these 24 students to participate in graduation exercises despite expressed prohibition of such participation.</li> </ul>
Standard 15	Professional Development Plan/Program	<ul style="list-style-type: none"> <li>• Three (3) elementary schools, one (1) middle school, and one (1) high school failed to implement a professional program aligned with the <i>Learning Forward Standards for Professional Learning</i>.</li> </ul>
Standard 16	Statewide Assessment System	<ul style="list-style-type: none"> <li>• <b>The District is compliant with Process Standard 16.</b></li> </ul>
Standards 17 and 17.1	Early Childhood Programs (Kindergarten)	<ul style="list-style-type: none"> <li>• The District failed to comply with the <i>Mississippi Kindergarten Guidelines</i> in both elementary schools monitored.</li> </ul>
Standards 17 and 17.2	Pre-Kindergarten Programs	<ul style="list-style-type: none"> <li>• The District failed to comply with the <i>Mississippi Early Learning Guidelines</i> in the elementary school containing pre-kindergarten classrooms.</li> </ul>
Standards 17 and 17.3	Career-Technical Education Program	<ul style="list-style-type: none"> <li>• The District failed to maintain an accurate inventory of equipment.</li> </ul>
Standards 17 and 17.4	Special Education Program	<ul style="list-style-type: none"> <li>• The District failed to ensure compliance with the <i>Individuals with Disabilities Education Act (IDEA)</i>.</li> </ul>
Standards 17 and 17.5	Child Nutrition	<ul style="list-style-type: none"> <li>• All four (4) school cafeterias failed to comply with state and/or federal requirements for Child Nutrition.</li> <li>• The District failed to produce documentation of food production records.</li> <li>• The District improperly borrowed USDA Child Nutrition funds.</li> </ul>
Standards 17 and 17.5.1	School Wellness Policy	<ul style="list-style-type: none"> <li>• The District failed to produce complete and current School Wellness Policies for all six (6) schools.</li> </ul>
Standards 17 and 17.6	<i>Elementary and Secondary Education Act</i>	<ul style="list-style-type: none"> <li>• The District failed to ensure compliance with the <i>Elementary and Secondary Education Act (ESEA)</i> as amended by <i>Every Student Succeeds Act of 2015 (ESSA)</i>.</li> </ul>
Standards 17 and 17.7	Driver Education	<ul style="list-style-type: none"> <li>• <b>The District is compliant with Process Standard 17.7.</b></li> </ul>
Standards 17 and 17.8	Gifted Education Program	<ul style="list-style-type: none"> <li>• The District failed to meet minimum requirements outlined in the <i>Regulations for Gifted Education Programs in Mississippi</i> and the <i>Gifted Education Program Standards</i>.</li> </ul>

POLICY/ STANDARD	AREA EVALUATED	SUMMARY OF FINDINGS
Standards 18, 18.1, and 18.2	Library/Media Center and Services	<ul style="list-style-type: none"> <li>• All four (4) school libraries had findings of noncompliance.</li> <li>• The overall collection of each library did not represent a well-balanced, broad range of current learning media, including up-to-date instructional technology, periodicals, teacher resources, and equipment.</li> <li>• Incomplete records do not reflect the school library collection's value.</li> </ul>
Standards 19, 19.1, and 19.2	Textbook Requirements	<ul style="list-style-type: none"> <li>• The District failed to provide all students access to current textbooks.</li> <li>• The District failed to provide accurate textbook inventories.</li> </ul>
Standards 20, 20.1, and 20.2	Instructional Management System	<ul style="list-style-type: none"> <li>• The District failed to implement an Instructional Management System that contained the minimum competencies and objectives required in the current curriculum frameworks approved by the State Board of Education.</li> <li>• The District failed to implement a tiered instructional model that includes academic interventions, behavioral interventions, and the requirements of the <i>Literacy Based Promotion Act</i>.</li> </ul>
Standards 21, 21.1, and 21.2	Promotion, Retention, and Uniform Grading Policy	<ul style="list-style-type: none"> <li>• Inconsistencies exist in Board policies and District publications regarding the promotion, retention and progression of students.</li> </ul>
Standard 22	Alternative Education Program	<ul style="list-style-type: none"> <li>• The alternative education program failed to meet minimum requirements outlined in the <i>Guidelines for Alternative/GED School Programs</i>.</li> </ul>
Standard 23	GED Option	<ul style="list-style-type: none"> <li>• <b>Not applicable. The District does not operate a GED Option program.</b></li> </ul>
Standards 24, 24.1, and 24.2	Unencumbered Planning Time	<ul style="list-style-type: none"> <li>• <b>The District is compliant with Process Standard 24.</b></li> </ul>
Standard 25	Limit on Course Preparations	<ul style="list-style-type: none"> <li>• <b>The District is compliant with Process Standard 25.</b></li> </ul>
Standard 26	Basic Secondary Curriculum Requirements	<ul style="list-style-type: none"> <li>• The high school failed to offer at least one (1) advanced placement (AP) course in each of the four (4) core areas.</li> </ul>
Standards 27, 27.1, 27.2, and 27.3	Implementation of the Basic Elementary Curriculum in Grades K-8	<ul style="list-style-type: none"> <li>• The MDE was unable to gain access to the required documentation due to the schools not being in session and staff members not being available. Therefore, the MDE could not determine compliance of Process Standard 27.</li> </ul>

POLICY/ STANDARD	AREA EVALUATED	SUMMARY OF FINDINGS
Standards 28, 28.1, 28.2, 28.3, 28.4, and 28.5	Student Teacher Ratios	<ul style="list-style-type: none"> <li>• The District is compliant with Process Standard 28.</li> </ul>
Standards 29 and 29.1	Transportation Program and Quarterly Inspection of Buses	<ul style="list-style-type: none"> <li>• The District failed to perform quarterly inspections of buses.</li> </ul>
Standard 29.2	Valid Bus Driver's Certificate and Commercial Driver's License	<ul style="list-style-type: none"> <li>• The District failed to provide documentation of the required two (2) hours of in-service training per semester of every bus driver.</li> </ul>
Standard 29.3	Bus Arrival/Departure Schedules	<ul style="list-style-type: none"> <li>• The MDE could not evaluate Process Standard 29.3 because school was not in session.</li> </ul>
Standard 29.4	Emergency Evacuation Drills	<ul style="list-style-type: none"> <li>• The District failed to meet the minimum requirements for emergency evacuation drills.</li> </ul>
Standard 30	School District Facilities	<ul style="list-style-type: none"> <li>• The District failed to provide clean and sanitary facilities in a safe and secure environment in all six (6) schools.</li> <li>• The MDE found a total of 128 deficiencies.</li> </ul>
Standard 31	School Safety Plan and Implementation	<ul style="list-style-type: none"> <li>• All six (6) schools failed to meet minimum school safety requirements.</li> </ul>
Standards 32, 32.1, and 32.2	Youth Detention Center	<ul style="list-style-type: none"> <li>• The District is compliant with Process Standard 32.</li> </ul>

**ACCREDITATION POLICY 2.1:** The Commission on School Accreditation determines the annual accreditation status of all public school districts in the fall of each school year based on verified accreditation data from the previous school year. An annual district accreditation status is assigned based on compliance with Process Standards. Information concerning district compliance with Process Standards is reported to the Commission on an annual basis. The District superintendent and school principals are responsible for ensuring that all data reported to the Mississippi Department of Education are true and accurate as verified by supporting documentation on file in the school district. Reporting false information is a violation of the accreditation requirements set forth by the State Board of Education and may result in the downgrading of the District's accreditation status.

**REGULATIONS:** Miss. Admin. Code 7- 3: 2.1, State Board Policy Chapter 2, Rule 2.1

**SUMMARY of FINDINGS**

- Based on a review of the 2017-2018 MSIS Personnel/Accreditation Data Report and Contracts for Certified Employees, the Superintendent and school principals failed to ensure that all data reported to the Mississippi Department of Education are true and accurate as verified by supporting documentation on file in the school district in accordance with Accreditation Policy 2.1 of the *Mississippi Public School Accountability Standards, 2018*.

The District is **NONCOMPLIANT** with Accreditation Policy 2.1.

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>A comparison of the 2017-2018 Mississippi Student Information System (MSIS)* Personnel/Accreditation Data Report with employee contracts and salary schedules revealed numerous errors, omissions, and inconsistencies among MSIS reports, salary schedules, and contracts. The MDE found the following deficiencies:</p> <ul style="list-style-type: none"> <li>Salaries reported in employee contracts differ with the salaries reported in the MSIS Personnel/Accreditation Data Report for 2017-2018.</li> <li>Salaries reported for employees in the MSIS Personnel/Accreditation Data Report and in</li> </ul>	<p>In order to comply with Accreditation Policy 2.1 of the <i>Mississippi Public School Accountability Standards, 2018</i>, the District shall ensure all administrative staff members and any other staff assigned to report MSIS data are properly trained on the MSIS data reporting requirements, procedures, and timelines to ensure that only the highest quality data is submitted.</p> <ul style="list-style-type: none"> <li>Administrators and other appropriate personnel shall become familiar with the <i>MSIS Personnel Reference Manual</i> that can be downloaded and printed from the Management Information System (MIS) web page at</li> </ul>	<p>December 14, 2018</p>

\* MSIS is the official source of student and personnel data for Mississippi public schools.

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>employee contracts could not be matched to the district pay scales.</p> <ul style="list-style-type: none"> <li>• The number of days employed in the contracts of some employees does not match the number of days employed reported in the 2017-2018 MSIS Personnel/Accreditation Data Report.</li> <li>• The District did not provide supplemental contracts for every individual receiving an additional salary for other duties. Therefore, the MDE could not verify whether the District reported all employee supplements in MSIS for these individuals.</li> </ul> <p>The District reported 269 employees on the MSIS Detailed Personnel Report.</p> <ul style="list-style-type: none"> <li>• The District provided copies of 208 contracts for auditors to review.</li> <li>• The District provided contracts for seven (7) employees not reported in MSIS.</li> <li>• The District provided two (2) contracts for one (1) employees reported in MSIS.</li> <li>• Twenty-five (25) employees have salaries on contracts that do not match salaries reported in MSIS.</li> <li>• Two (2) contracts lacked superintendent's (or designee's) signature</li> <li>• Eight (8) employees have number of days employed on contract that does not match number of days employed reported in MSIS.</li> <li>• One (1) employee has two (2) addendums but no contract. The amounts on the two (2) addendums differ.</li> </ul> <p>The District failed to provide approved job descriptions for all positions.</p>	<p><a href="http://www.mde.k12.ms.us/docs/msis/msisrefman.pdf?sfvrsn=2">http://www.mde.k12.ms.us/docs/msis/msisrefman.pdf?sfvrsn=2</a></p> <ul style="list-style-type: none"> <li>• The individual(s) responsible for personnel records and MSIS data shall perform their tasks with diligence and thoroughness to demonstrate the importance of keeping accurate, complete, and up-to-date records.</li> <li>• Documentation supporting compliance with employment policies and procedures shall be current and on file in the District.</li> <li>• Approved job descriptions shall be developed and on file for all positions, including all additional duties assigned to employees. Each employee shall have an approved job description that accurately describes his/her job duties and qualifications.</li> <li>• The District shall review job descriptions, work assignments and duties, as well as contracts and salaries, to ensure that all employees have been accurately reported on the MSIS Personnel/Accreditation Data Report, and that employee contracts substantiate the same data.</li> <li>• All data shall be reported accurately and in compliance with MSIS reporting procedures. All personnel data shall be consistent. Personnel information approved by the school board shall be consistent with information reported in contracts and in the MSIS report. When reporting active personnel to MSIS, the District shall ensure the following:</li> </ul>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Staff members reported to MDE that they have been directed to falsify records by the Superintendent and other district leadership. Staff members reported that the Superintendent manages through the use of fear and intimidation, including yelling at and belittling staff members both in private and in staff meetings. Staff members feared retaliation from the Superintendent if they were not assured a degree of confidentiality in their interviews with MDE auditors.</p>	<ul style="list-style-type: none"> <li>○ All assigned district duties, job titles, and salaries shall be reported to the MDE via the MSIS Personnel/Accreditation Data Report.</li> <li>○ Additional supplements and stipends shall be reported for each district employee in accordance with MSIS guidelines.</li> <li>○ Employees who begin work after the official school-starting day shall be reported with less than 100% district time.</li> <li>○ For the number of days employed, indicate the number of days the employee is under contract.</li> <li>○ Special Program Codes shall be used to indicate that all or part of the employee’s salary is paid from federal or special state funds.</li> <li>○ When an employee works in more than one (1) position, the salary for each position shall be reported separately.</li> <li>○ When an employee’s salary is paid from more than one (1) funding source, the employee’s salary and time shall be prorated.</li> <li>○ Any period block that is after normal school hours shall be indicated with “AS.”</li> <li>○ The work assignments of employees shall be accurately reflected in the MSIS Personnel/Accreditation Data Report and shall correspond with each school’s daily schedule.</li> <li>○ The period numbers shall correspond to number of periods in the school day and shall show the class/course/assignment for each employee, including their planning period. (Exceptions include Pre-Kindergarten and Kindergarten and some special education teachers.) Generally, in a seven-period day, six (6) of the class periods should correspond to six (6) courses and one (1)</li> </ul>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
	<p>period shall indicate planning in the schedules of full-time teachers.</p> <ul style="list-style-type: none"> <li>○ The required amount of instructional time for all teachers shall be reflected in class schedules. Adequate non-instructional time that allows for movement within the school day, including class changes and lunch, shall be built into these schedules. School schedules shall be uniform among all teachers within the same school.</li> </ul> <p>The staff responsible for reporting MSIS data shall attend the <i>Mississippi Education and Technology Innovation Symposium (METIS)</i> held each year.</p> <p>The MDE will assign staff to monitor the MSIS Personnel/Accreditation data reporting process for school year 2018-2019 and verify that all required information is accurately reported following established procedures.</p> <p>This citation of noncompliance will remain on record until the 2018-2019 MSIS Personnel Accreditation Data Report is submitted with all required data supported by documentation on file with the District, and the Office of Accreditation has verified compliance with such data.</p> <p>The District should contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Accreditation Policy 2.1.</p>	

**Standard 1: The local school board and the superintendent of schools shall exercise due diligence in performing the respective duties of each office in accordance with applicable law. The local school board’s responsibilities shall pertain to matters of setting policy and shall not interfere in the day-to-day operations of the school district that include, but are not limited to, such duties as those relating to personnel and management decisions. Failure to comply shall result in the immediate downgrade of the District’s accreditation status to Probation or Withdrawn as indicated in Accreditation Policy 2.5.**

**REGULATIONS:** Miss. Code Ann. §§ 25-41-1 et al., §§ 25-61-1 through 17, § 37-3-4(5), §§ 37-6-7, 9, 11, and 15, § 37-7-306(1-4), §§ 37-9-1 through 75, §§ 37-9-101 through 113, § 37-7-301(p)(w), § 37-6-3(3-4), §§ 37-9-7, 13, and 14, § 37-61-9, § 37-151-5(h), and the *Federal Civil Rights Act of 1964*

**1.1: The school board assigns all executive and administrative duties to the superintendent, who is properly licensed and chosen in the manner prescribed by law.**

**REGULATIONS:** Miss. Code Ann. § 37-6-3(3-4), §§ 37-9-7, 13, and 14, § 37-61-9, and § 37-151-5(h)

**SUMMARY of FINDINGS**

- Based on the on-site investigative audit conducted in the Noxubee County School District June 25, 2018 through July 3, 2018, the Superintendent failed to provide effective educational leadership in key areas including management of district personnel, effective implementation of policies, and the development of Board and community relations.

**The District is NONCOMPLIANT with Process Standards 1 and 1.1.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Miss. Code Ann. § 37-9-14 outlines the management responsibilities of the school district superintendent as required by State law and approved local school board policies, which includes implementing plans, procedures, programs, and systems to achieve clearly defined, desired results. The Superintendent failed to provide effective educational leadership in key areas including management of district personnel, effective implementation of policies, and the development of Board and community relations.</p>	<p>In order to comply with Miss. Code Ann. § 37-9-14, the District shall ensure the Superintendent implements plans, procedures, programs, and systems to achieve clearly defined, desired results. The Superintendent shall employ appropriately licensed individuals to implement the programs.</p> <p>The Superintendent shall:</p> <ul style="list-style-type: none"> <li>• Oversee a program to manage and monitor discipline procedures for equity and effectiveness;</li> </ul>	<p>Immediately and Ongoing</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Examples include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• The Superintendent failed to ensure that all data reported to the MDE are true and accurate as verified by supporting documentation on file in the school district. <i>(See also Accreditation Policy 2.1)</i></li> <li>• The Superintendent failed to implement appropriate standards of governance. <i>(See also Process Standards 1.2 and 1.3)</i></li> <li>• The Superintendent failed to ensure that the District operates according to school board policies and procedures that comply with State and Federal statutes and SBE policies and standards. Based on confidential interviews with staff members, the superintendent interferes with the building administration’s ability to recommend personnel and implement the District’s discipline policies. <i>(See also Process Standards 1.2 and 1.3)</i></li> <li>• The Superintendent failed to comply with financial accountability requirements. <i>(See also Process Standards 4 and 5 and Attachment A: Letter from Superintendent to MDE)</i></li> <li>• The Superintendent failed to ensure that all graduating seniors of School Year 2017-2018 met graduation requirements. <i>(See also Process Standard 14)</i></li> <li>• The Superintendent failed to implement a professional development program aligned with the <i>Learning Forwards Standards for Professional Learning</i>. <i>(See also Process Standard 15)</i></li> <li>• The Superintendent failed to ensure compliance with regulations for Career-Technical Education. <i>(See also Process Standard 17.3)</i></li> </ul>	<ul style="list-style-type: none"> <li>• Implement an Instructional Management Plan (IMP) that clearly defines the academic goals necessary for improving student achievement;</li> <li>• Employ experienced individuals capable of implementing the IMP and Professional Development Program throughout the District;</li> <li>• Promote a relationship among the Board, administrators, teachers, and the community that promotes trust, honest communication, and sincerity; and</li> <li>• Establish a mechanism to promote community and business commitment and involvement with the district and building a relationship of trust.</li> </ul> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standards 1 and 1.1.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• The Superintendent failed to ensure compliance with the <i>Individuals with Disabilities Act</i>. (See also Process Standard 17.4)</li> <li>• The Superintendent failed to ensure compliance with regulations for Child Nutrition. (See also Process Standard 17.5)</li> <li>• The Superintendent failed to ensure compliance with <i>Elementary and Secondary Education Act</i> as amended by the <i>Every Student Succeeds Act of 2015 (ESSA)</i>. (See also Process Standard 17.6)</li> <li>• As the educational leader of the District, the Superintendent failed to implement an instructional management plan that clearly defines the academic goals necessary for improving student achievement. (See also Process Standard 20)</li> <li>• The Superintendent failed to ensure that school facilities are maintained according to standards required for clean, safe, and orderly schools. (See also Process Standards 30 and 31)</li> <li>• The Superintendent failed to ensure that a positive, safe, and secure school climate exists for students where teachers and staff feel supported by the administration and are able to maintain order and control. (See also Process Standard 31.</li> <li>• The Superintendent failed to provide documentation of criminal background checks for all Career and Technical Education, Learn and Serve, and AmeriCorp staff hired after July 1, 2000.</li> </ul>		

**Standard 1: The local school board and the superintendent of schools shall exercise due diligence in performing the respective duties of each office in accordance with applicable law. The local school board’s responsibilities shall pertain to matters of setting policy and shall not interfere in the day-to-day operations of the school district that include, but are not limited to, such duties as those relating to personnel and management decisions. Failure to comply shall result in the immediate downgrade of the District’s accreditation status to Probation or Withdrawn as indicated in Accreditation Policy 2.5.**

**REGULATIONS: Miss. Code Ann. §§ 25-41-1 et al., §§ 25-61-1 through 17, § 37-3-4(5), §§ 37-6-7, 9, 11, and 15, § 37-7-306(1-4), §§ 37-9-1 through 75, §§ 37-9-101 through 113, § 37-7-301(p)(w), § 37-6-3(3-4), §§ 37-9-7, 13, and 14, § 37-61-9, § 37-151-5(h), and the *Federal Civil Rights Act of 1964***

**1.2: School board policies that comply with state and federal statutes, rules, and regulations serve as the basis of operation for the District, and current copies (print or electronic) of school board policies are published and available for public review.**

**REGULATIONS: Miss. Code Ann. § 25-41-7, §§ 25-61-1 through 17, §§ 37-9-1 through 75, §§ 37-9-101 through 113, § 37-7-301(p)(w), and the *Federal Civil Rights Act of 1964***

**SUMMARY of FINDINGS**

- Local board policies do not serve as the basis of operation for the District.
- Board policies are not reviewed, revised, and published in an effective or efficient manner.

**The District is NONCOMPLIANT with Process Standards 1 and 1.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Current Board policies do not serve as the basis of operation for the District. The most recent approved revisions to Board policies occurred in 2013. Board policies reference outdated editions of the <i>Mississippi Public School Accountability Standards</i>.</p> <p>The District provided MDE auditors with Board policies in multiple formats (print and electronic) that were inconsistent.</p>	<p>Pursuant to Miss. Code Ann. § 25-41-7, §§ 25-61-1 through 17, §§ 37-9-1 through 75, §§ 37-9-101 through 113, § 37-7-301(p)(w); and the <i>Federal Civil Rights Act of 1964</i>, local board policies that comply with State and Federal statutes and SBE policies shall serve as the basis of operation of the District.</p> <p>The District shall review and revise all district policies and publications to ensure that all statements are clearly</p>	<p>Immediately and Ongoing</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>District staff utilize the District’s website when referencing district policies. As of July 3, 2018, the policies posted on the website had not been updated for public viewing. Board minutes indicate that Board members are reviewing and approving policies but do not contain detailed information as to the specific policies being reviewed, revised and/or approved. Some Board policies are merely templates provided by the Mississippi School Boards Association that have not been customized to be District specific.</p> <p>During the July 2, 2018 Board meeting, the Superintendent informed the Board that the Board’s secretary had been updating and revising policies and the revised policies were ready to be posted to the website. When Board members inquired as to which policies were being posted, the Superintendent informed the Board that over 300 pages of policies were ready to be posted. One (1) Board member indicated that they could not access or view the updated policies. The Board attorney advised the secretary not to post them because he had not reviewed them and that a substantial amount of work needed to be done on them. Additionally, he stated that he needed a password to login to access them. During interviews, when MDE asked Board members to explain the process for reviewing and approving policies, their responses were inconsistent and vague.</p> <p>Based on confidential interviews with and statements from staff members, board policies are inconsistently followed. Specifically, discipline is implemented inconsistently: decisions of the school administrators, and district staff are overturned by the superintendent.</p>	<p>written and consistent with approved school board policy as well as state and federal statutes.</p> <p>When revision(s) are made and approved by the school board, the District shall communicate the revision(s) to all staff, parents, and students and shall ensure the policies posted on the District’s website are current.</p> <p>The District shall consistently implement all board policies, including, but not limited to, policies pertaining to student discipline, throughout the District to ensure equity for all students.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a>, or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standards 1 and 1.2.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The MDE could not verify salaries of non-certified staff because after voting for new salary scales for non-certified staff, the Board voted to not adjust salaries based on the Board approved scale but on a different formula.</p> <p>The District also provided MDE auditors with two (2) different versions of the District’s student handbook. District staff informed auditors that the District adhered to the 2015-2016 student handbook because the Board did not approve the revised student handbook. Based on interviews with the Superintendent, Board members and staff members, the current Superintendent recommended a student handbook for approval in 2016 for the 2016-2017 school year. Due to unapproved changes within the discipline policies, the Board did not approve the revised student handbook and voted to continue utilizing the 2015-2016 student handbook. The 2015-2016 student handbook continued to be used for the 2017-2018 school year.</p> <p>The 2015-2016 student handbook contains policies and procedures that are inconsistent with state law and State Board of Education policies including, but not limited to, policies pertaining to attendance, grading, and graduation. The 2015-2016 version of the student handbook also continued to reflect the previous administration including the previous superintendent.</p> <p>As of July 3, 2018, the Superintendent has not submitted a revised student handbook for the upcoming 2018-2019 school year for Board approval. The Superintendent stated that there would be a need to convene a special-called board meeting late in July to seek approval of the student handbook once it is ready.</p>		

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The Superintendent and Board failed to implement policies that clearly define and ensure that the necessary plans, procedures, programs, and systems are in place to serve all students. The Superintendent and Board also failed to ensure that the District operates according to school board policies and procedures that comply with state and federal statutes and State Board of Education policies and process standards. Examples include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Ensuring that all data reported to the MDE are true and accurate (<i>See also</i> Accreditation Policy 2.1),</li> <li>• Ensuring implementation of appropriate standards of governance (<i>See also</i> Process Standards 1.1 and 1.3),</li> <li>• Complying with financial accountability requirements. (<i>See also</i> Process Standards 4 and 5 and Attachment A: Letter from Superintendent to MDE)</li> <li>• Ensuring all graduating seniors of School Year 2017-2018 met graduation requirements (<i>See also</i> Process Standard 14),</li> <li>• Implementing a professional development program aligned with the <i>Learning Forwards Standards for Professional Learning</i>. (<i>See also</i> Process Standard 15),</li> <li>• Ensuring compliance with regulations for Career-Technical Education (<i>See also</i> Process Standard 17.3),</li> <li>• Ensuring compliance with the <i>Individuals with Disabilities Act</i> (<i>See also</i> Process Standard 17.4),</li> <li>• Ensuring compliance with regulations for Child Nutrition (<i>See also</i> Process Standard 17.5),</li> </ul>		

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• Ensuring compliance with the <i>Elementary and Secondary Education Act</i> as amended by <i>Every Student Succeeds Act of 2015 (ESSA)</i> (See also Process Standard 17.6),</li> <li>• Implementing an instructional management plan that clearly defines the academic goals necessary for improving student achievement (<i>See also</i> Process Standard 20),</li> <li>• Ensuring school facilities are maintained according to standards required for clean, safe, and orderly schools (<i>See also</i> Process Standards 30 and 31), and</li> <li>• Ensuring a positive, safe, and secure school climate for students where teachers and staff feel supported by the administration and are able to maintain order and control (<i>See also</i> Process Standard 31).</li> </ul>		

**Standard 1: The local school board and the superintendent of schools shall exercise due diligence in performing the respective duties of each office in accordance with applicable law. The local school board’s responsibilities shall pertain to matters of setting policy and shall not interfere in the day-to-day operations of the school district that include, but are not limited to, such duties as those relating to personnel and management decisions. Failure to comply shall result in the immediate downgrade of the District’s accreditation status to Probation or Withdrawn as indicated in Accreditation Policy 2.5.**

**REGULATIONS: Miss. Code Ann. §§ 25-41-1 et al., §§ 25-61-1 through 17, § 37-3-4(5), §§ 37-6-7, 9, 11, and 15, § 37-7-306(1-4), §§ 37-9-1 through 75, §§ 37-9-101 through 113, § 37-7-301(p)(w), § 37-6-3(3-4), §§ 37-9-7, 13, and 14, § 37-61-9, § 37-151-5(h), and the *Federal Civil Rights Act of 1964***

**1.3: School board members complete required basic and continuing education programs in order to effectively perform their duties in the manner prescribed by law.**

**REGULATIONS: Miss. Code Ann. §§ 25-41-1 et al., §§ 25-61-1 through 17, § 37-3-4(5), §§ 37-6-7, 9, 11, and 15, and § 37-7-306(1-4)**

**SUMMARY of FINDINGS**

- The Noxubee County School Board failed to effectively perform its duties in its role of oversight of management for the District as prescribed by law.
- The Noxubee County School Board failed to operate the District in accordance with current school board policies. Consequently, it failed to ensure that it provided proper governance and leadership to the District.

**The District is NONCOMPLIANT with Process Standards 1 and 1.3.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The Board failed to effectively perform its duties in accordance with applicable law.</p> <p>The Board failed to limit its responsibilities to matters of setting policy and accessing results.</p> <p>The District failed to provide documentation (Certificate of Completion) for all five (5) Board members of the</p>	<p>In order to comply with Miss. Code Ann. §§ 25-41-1 et. al; §§ 25-61-1 through 17; § 37-3-4(5); §§ 37-6-7, 9, 11, and 15; and § 37-7-306(1-4), the school board shall govern in a manner that concentrates on policymaking to improve student achievement. Policies shall be developed, implemented, and practiced by all District personnel, including the Board and Superintendent.</p>	<p>Immediately and Ongoing</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>required six (6) hours of developmental training for 2017-2018.</p> <p>The District failed to provide evidence of a current insurance bond for one (1) Board member. The insurance bond expired in December of 2017.</p> <p>Based on confidential interviews and reports from District personnel, Board members are actively engaged in the day-to-day operations of the District. Staff members indicated that Board members circumvent the District's chain of command and interfere with the administration's ability to implement board policies.</p> <p>A review of official records on file, including Board minutes, as well as information gathered from District personnel, indicates that the Board may be in violation of the Mississippi Open Meetings Act. Examples of potential violations include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Board minutes reveal that Board meeting agendas are amended but without a vote by Board members.</li> <li>• Board minutes, in general, are vague and do not report specific actions proposed or taken. Board minutes revealed that an accurate recording of final action of the Board, especially the outcomes of executive sessions was not always reflected in the Board minutes.</li> <li>• Furthermore, Board minutes do not reveal that the Board has limited the use of executive session to those subject areas permitted under state statute. Reasons provided in the Board minutes for the executive session are vague.</li> </ul>	<p>The school board shall set policy, delegate executive, supervisory and instructional authority to the District's employees, and appraise the results achieved in light of the goals of the school district.</p> <p>Board members are not responsible for the day-to-day operations of the school and shall not become involved in issues until they are presented to the Board. Issues or concerns shall be resolved following the District's chain of command and shall not be presented to the Board until all administrative avenues of resolution have been exhausted in accordance with board policy. The Board speaks to day-to-day situations through its policy statements.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standards 1 and 1.3.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The Board failed to ensure the District administration implements approved Board policies and procedures that comply with State and Federal statutes and SBE policies and standards (<i>See also</i> Standard 1.2). Additional examples include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Ensuring all data reported to the MDE are true and accurate as verified by supporting documentation on file in the school district (<i>See also</i> Accreditation Policy 2.1),</li> <li>• Ensuring implementation of appropriate standards of governance (<i>See also</i> Process Standards 1, 1.1 and 1.2),</li> <li>• Complying with financial accountability requirements (<i>See also</i> Process Standards 4 and 5 and Attachment A: Letter from Superintendent to MDE),</li> <li>• Ensuring all graduating seniors of School Year 2017-2018 met graduation requirements (<i>See also</i> Process Standard 14),</li> <li>• Implementing a professional development program aligned with the <i>Learning Forward Standards for Professional Learning</i>. (<i>See also</i> Process Standard 15)</li> <li>• Ensuring compliance with regulations for Career-Technical Education (<i>See also</i> Process Standard 17.3),</li> <li>• Ensuring compliance with the <i>Individuals with Disabilities Act</i> (<i>See also</i> Process Standard 17.4),</li> <li>• Ensuring compliance with regulations for Child Nutrition (<i>See also</i> Process Standard 17.5),</li> <li>• Ensuring compliance with <i>Elementary and Secondary Education Act</i> as amended by <i>Every Student Succeeds Act of 2015 (ESSA)</i> (<i>See also</i> Process Standard 17.6),</li> </ul>		

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• Ensuring implementation of an instructional management plan that clearly defines the academic goals necessary for improving student achievement (<i>See also</i> Process Standard 20),</li> <li>• Ensuring school facilities are maintained according to standards required for clean, safe, and orderly schools (<i>See also</i> Process Standards 30 and 31), and</li> <li>• Ensuring a positive, safe, and secure school climate exists for students where teachers and staff feel supported by the administration and are able to maintain order and control (<i>See also</i> Process Standard 31).</li> </ul>		

**Standard 2: All district professional positions requiring licensed staff are filled by staff that are properly licensed and endorsed as required by state law and federal requirements of the *Elementary and Secondary Education Act (ESEA)*.**

**REGULATIONS: Miss. Code Ann. § 37-9-7, Miss. Admin. Code 7-3: 80.1 and 80.2, State Board Policy Chapter 80, Rule 80.1 and 80.2, *ESEA (revised as ESSA)*, and Federal Code**

**SUMMARY of FINDINGS**

- For the 2017-2018 school year, 30.12 (or 28.91%) of the 104.17 Full Time Equivalencies positions were held by individuals who did not hold a valid Mississippi Teacher’s License or lacked proper endorsements for the subject they taught.

**The District is NONCOMPLIANT with Process Standard 2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Based on the 2017-2018 data reported in MSIS, The Office of Teaching and Leading determined the following:</p> <ul style="list-style-type: none"> <li>• The District had 104.17 Full Time Equivalencies (FTEs)</li> <li>• The District had 30.12 (or 28.91%) Full Time Equivalencies (FTEs) inappropriately licensed:               <ul style="list-style-type: none"> <li>○ 14.58 with an emergency provisional license;</li> <li>○ 8.51 teaching out-of-field; and</li> <li>○ 7.03 teaching with no license.</li> </ul> </li> </ul> <p>Based on the 2017-2018 MSIS report, the District employed 11 long-term substitutes.</p> <p>According to the District’s website, the District reported 15 vacancies for certified staff for the upcoming 2018-2019 school year in the following areas:</p> <ul style="list-style-type: none"> <li>○ Physical Education – 1</li> <li>○ Kindergarten – 2</li> <li>○ Middle School Science – 2</li> <li>○ Elementary Grades – 8</li> </ul>	<p>In order to comply with Miss. Code Ann. § 37-9-7, which states, “It shall be unlawful for any superintendent, principal, or teacher to be employed or contracted with to teach or serve in any of the public schools of this state who does not hold a proper license as required by the State Board of Education,” the District shall:</p> <ul style="list-style-type: none"> <li>• Develop and implement approved local school board policy for the employment of certified teaching staff that complies with state law and State Board of Education (SBE) policy.</li> <li>• Fill all district professional positions requiring licensed staff with staff that are properly licensed and endorsed as required by state law and federal requirements of the <i>Elementary and Secondary Education Act (ESEA)</i>.</li> </ul>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>○ Human A &amp; P – 1</li> </ul> <p>Girls Varsity Basketball Coach - 1</p>	<p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 2.</p>	

**Standard 2.1: The school district employs an appropriately licensed full-time principal at each school. The principal may not have any other job duties assigned in areas that require a specific work area code unless a waiver is granted by the Commission on School Accreditation. This standard does not apply to assistant principals.**

**REGULATIONS: Miss. Code Ann. §§ 37-9-7 and 15, and § 37-151-5(g)**

**SUMMARY of FINDINGS**

- According to the data reported in MSIS, the Noxubee County School District employed a licensed, full-time principal at each school during School Year 2017-2018.

**The District is COMPLIANT with Process Standard 2.1.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
None	N/A	N/A

**Standard 2.2: With the exception of academic core subjects, the professional staff in each school is comprised of no more than 5% of Full Time Equivalent (FTE) units working outside the area or areas of endorsement. Assistant principals and administrative interns who are not properly endorsed may be included in the 5% FTE working outside their area of endorsement, provided that they do not act in the place of the principal. An appropriate license is required for superintendents, principals, librarians, and guidance counselors.**

**REGULATIONS: Miss. Admin. Code 7-3: 2.1, State Board Policy Chapter 2, Rule 2.1**

**SUMMARY of FINDINGS**

- Thirty (30.12) Full Time Equivalents (FTEs) of the 104.17 teachers employed in the Noxubee County District during School Year 2017-2018 worked outside of the area(s) of endorsement.

**The District is NONCOMPLIANT with Process Standard 2.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Based on the MSIS Personnel/Accreditation Data Report for School Year 2017-2018, and data analysis conducted by the Office of Teaching and Leading, 30.12 Full Time Equivalencies (FTEs) of the 104.17 teachers employed by the District were not appropriately licensed and/or endorsed.</p> <ul style="list-style-type: none"> <li>• Emergency Licenses = 14.58 FTE</li> <li>• Teaching Out of Field = 8.51 FTE</li> <li>• Teaching with No License = 7.03 FTE</li> </ul>	<p>In order to comply with Process Standard 2.2, all District professional positions requiring licensed staff shall be filled by staff who are properly licensed and endorsed as required by policy, state law, and federal requirements of the <i>Elementary and Secondary Education Act</i> (revised as <i>ESSA</i>).</p> <p>The District shall report vacancies to the Mississippi Department of Education, Office of Teaching and Leading for assistance with recruiting teachers.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:jmalone@mdek12.org">jmalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 2.2.</p>	<p>August 31, 2018</p>

**Standard 2.3: The school district employs in each school a licensed librarian or media specialist who devotes no more than one-fourth (1/4) of the workday to library/media administrative activities.**

**2.3.1: If the student enrollment is 499 or less, a half-time licensed librarian or media specialist is required.**

**2.3.2: If the student enrollment is 500 or more, a full-time licensed librarian or media specialist is required.**

**REGULATIONS: Miss. Code Ann. §§ 37-17-6(3)(a) through (e)**

**SUMMARY of FINDINGS**

- The MDE monitored two (2) elementary schools, one (1) middle school, and one (1) high school.
- Librarians served in multiple capacities, which prevented librarians from fulfilling the role as a half-time or full-time librarian.

**The District is NONCOMPLIANT with Process Standards 2.3, 2.3.1, and 2.3.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to develop and utilize a flexible library class schedule that promotes open access to library facilities and resources. According to the MDE library handbook, two (2) elementary schools, one (1) middle school, and one (1) high school are noncompliant:</p> <ul style="list-style-type: none"> <li>● Virgil J. Jones, Jr. Elementary School</li> <li>● Earl Nash Elementary School</li> <li>● B.F. Liddell Middle School*</li> <li>● Noxubee County High School</li> </ul> <p>*Note: The library located at BF Liddell Middle School is also utilized by B.F. Liddell Elementary School.</p>	<p>The District shall review and ensure compliance with Section 3.7 Promoting Flexible, Open Access and Section 6.1 Personnel in the current <i>Mississippi School Library Guide</i>.</p> <p>The librarians shall function 100% in the library position, either half-time or full-time, depending on the school population.</p> <p>The administrators shall ensure that librarian’s schedule allows time during the workday for library administrative activities and collaborate with teachers.</p> <p>The District shall create a non-traditional school day or mobile library policy that explains how the librarian is to function when removed from the normal library location or schedule.</p>	<p>August 31, 2018</p>

The school librarians shall not act as a substitute teacher and shall not be removed from the library to act as a long-term substitute.

The school librarians shall develop library schedules, which provides open and flexible access for all students and teachers.

Contact Elizabeth Simmons, Library Media Specialist, Office of Elementary Education and Reading, at [ESimmons@mdek12.org](mailto:ESimmons@mdek12.org) or 601.359.2586 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 2.3.

**Standard 2.4: Student support services (appraisal, academic, and/or personal advisement, and educational and/or career planning and referral) are provided in each school by qualified student support personnel. Student support personnel may only provide those services and activities in the area(s) that each individual is specifically qualified to provide and will use only job titles that reflect same.**

**REGULATIONS: Miss. Code Ann. § 37-9-7, Miss. Admin. Code 7-3: 80.1 and 80.2, State Board Policy Chapter 80, Rule 80.1 and 80.2, ESEA (revised as ESSA), and Federal Code**

**SUMMARY of FINDINGS**

- The MDE monitored five (5) schools: three (3) elementary schools, one (1) middle school and one (1) high school.

**The District is NONCOMPLIANT with Process Standard 2.4.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The following five (5) schools failed to create an advisory council or an annual agreement:</p> <ul style="list-style-type: none"> <li>• Virgil Jones, Jr. Elementary School</li> <li>• B.F. Liddell Elementary School</li> <li>• Earl Nash Elementary School</li> <li>• B.F. Liddell Middle School</li> <li>• Noxubee County High School</li> </ul> <p>The following four (4) schools failed to create a mission, vision, and goals for their school counselor program:</p> <ul style="list-style-type: none"> <li>• Virgil Jones, Jr. Elementary School</li> <li>• B.F. Liddell Elementary School</li> <li>• Earl Nash Elementary School</li> <li>• B.F. Liddell Middle School</li> </ul> <p>The following two (2) schools failed to provide documentation of school counseling instruction in career development, personal/social development, and academic achievement.</p>	<p>Pursuant to Miss. Code Ann. § 37-9-7, Miss. Admin. Code 7- 3: 80.1 and 80.2, State Board Policy Chapter 80, Rule 80.1 and 80.2, ESEA (revised as ESSA), and Federal Code, the schools listed shall accomplish the following procedures to ensure compliance:</p> <ul style="list-style-type: none"> <li>• The noncompliant schools shall establish an advisory council at the school level and hold regularly scheduled meetings.</li> <li>• Counselors shall develop and uphold a mission, vision, and goals for their school counselor program.</li> <li>• The activities in the student services department shall be communicated effectively with guardians and community members in a timely manner (monthly for all stakeholders).</li> </ul> <p>Additionally, the school counselor shall create and maintain a professional schedule reflecting the counselor’s services both scheduled for and provided to students.</p>	<p>October 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• B.F. Liddell Elementary School</li> <li>• B.F. Liddell Middle School</li> </ul> <p>The following three (3) schools failed to provide information for guardians or the community reflecting a school counseling program or school counselor’s activities.</p> <ul style="list-style-type: none"> <li>• B.F. Liddell Elementary School</li> <li>• Earl Nash Elementary School</li> <li>• B.F. Liddell Middle School</li> </ul> <p>The following five (5) schools failed to provide calendars that specify daily counselor duties and professional development:</p> <ul style="list-style-type: none"> <li>• Virgil Jones, Jr. Elementary School</li> <li>• B.F. Liddell Elementary School</li> <li>• Earl Nash Elementary School</li> <li>• B.F. Liddell Middle School</li> <li>• Noxubee County High School</li> </ul> <p>The following five (5) schools have failed to complete evaluations on counselors using the counselor growth rubric:</p> <ul style="list-style-type: none"> <li>• Virgil Jones, Jr. Elementary School</li> <li>• B.F. Liddell Elementary School</li> <li>• Earl Nash Elementary School</li> <li>• B.F. Liddell Middle School</li> <li>• Noxubee County High School</li> </ul>	<p>School counselors shall meet annually with the principal to discuss the school counseling program goals and how the school counselor will deliver services to students. This plan shall be documented in the Annual Agreement.</p> <p>Principals shall evaluate the counselors every year using the counselor growth rubric and keep documentation. Every school counselor shall also have a current, signed annual agreement reflecting the school counseling program goals and use of time.</p> <p>Contact Dr. Dana Bullard, Bureau Director, Office of Secondary Education, at <a href="mailto:DBullard@mdek12.org">DBullard@mdek12.org</a> or 601.359.3933 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 2.4.</p>	

**Standard 2.5: The school district employs a school business officer/administrator whose qualifications meet the criteria established by the Mississippi Department of Education and whose primary job responsibilities are conducting, supervising, and/or directing the financial affairs and operations of the school district.**

**REGULATIONS: Miss. Admin. Code 7-3: 71.1 and 71.2, State Board Policy Chapter 71, Rule 71.1 and 71.2**

**SUMMARY of FINDINGS**

- The Noxubee County School District employs a school business officer/administrator.

The District is **COMPLIANT** with Process Standard 2.5.

FINDINGS	CORRECTIVE ACTION	TIMELINE
None	N/A	N/A

**Standard 3: The school district implements an annual, formal personnel appraisal system for licensed staff that includes assessment of employee on-the-job performance.**

- 3.1: Superintendent Evaluation using the assessment benchmarks established by the Mississippi School Boards Association (MSBA) and consistent with assessment components defined in Miss. Code Ann. § 37-7-301.**
- 3.2: Mississippi Principal Evaluation System (MPES).**
- 3.3: Mississippi Teacher Evaluation System.**
- 3.4: Other district staff evaluations as determined by local school board policy.**

**REGULATIONS: Miss. Code Ann. §§ 37-3-46(b) and 37-7-301**

<b>SUMMARY of FINDINGS</b>
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- The Superintendent utilizes his own evaluation system to evaluate the principals rather than the Mississippi Administrator Professional Growth System.
- The *Mississippi School Librarian Growth Rubric* is not used to evaluate school librarians.
- The *Mississippi Counselor Growth Rubric* is not used to evaluate counselors.

**The District is COMPLIANT with Process Standards 3.1.**  
**The District is NONCOMPLIANT with Process Standards 3, 3.2, 3.3, and 3.4.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Based on confidential interviews with principals, the superintendent utilizes his own evaluation system for evaluating principals rather than the Mississippi Administrator Professional Growth System. Principals provided the superintendent with requested documentation for their appraisals but no feedback had been received. Therefore, the District is noncompliant with Process Standard 3.2.</p> <p>School administrators stated that they used the Professional Growth System to evaluate their teachers, but the auditors did not review any of this documentation, and the District failed to report the results of the teacher</p>	<p>The Superintendent shall ensure that principals are evaluated using the most current version of the Mississippi Principal Evaluation System (currently known as Mississippi Educator and Administrator Professional Growth System).</p> <p>The Superintendent and principals shall ensure that teachers are evaluated using the most current version of the Mississippi Teacher Evaluation System (currently known as the Mississippi Educator and Administrator Professional Growth System).</p> <p>The District shall ensure the librarian is evaluated using</p>	<p>June 30, 2019</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>evaluations to the MDE by the June 30, 2018 deadline. Therefore, the District is noncompliant with Process Standard 3.3.</p> <p>The District failed to implement the <i>Mississippi Librarian Growth Rubric</i> as an evaluation tool for the school librarian. According to the <i>Mississippi Librarian Growth Rubric Guide</i> (See also Process Standard 2.3), two (2) elementary schools, one (1) middle school, and one (1) high school are noncompliant:</p> <ul style="list-style-type: none"> <li>● Virgil J. Jones, Jr. Elementary School</li> <li>● Earl Nash Elementary School</li> <li>● B.F. Liddell Middle School*</li> <li>● Noxubee County High School</li> </ul> <p>The following five (5) schools failed to complete evaluations on counselors using the <i>Mississippi Counselor Growth Rubric</i> (See also Process Standard 2.4):</p> <ul style="list-style-type: none"> <li>● Virgil Jones, Jr. Elementary School</li> <li>● B.F. Liddell Elementary School</li> <li>● Earl Nash Elementary School</li> <li>● B.F. Liddell Middle School</li> <li>● Noxubee County High School</li> </ul> <p>Therefore, the District is noncompliant with Process Standard 3.4.</p> <p>*Note: The library located at B.F. Liddell Middle School is also utilized by B.F. Liddell Elementary School.</p>	<p>the current <i>Mississippi Librarian Growth Rubric</i> located on the Mississippi Department of Education library website.</p> <p><a href="http://www.mde.k12.ms.us/docs/elementary-education-and-reading-library/mississippi-library-growth-rubric.pdf?sfvrsn=2">www.mde.k12.ms.us/docs/elementary-education-and-reading-library/mississippi-library-growth-rubric.pdf?sfvrsn=2</a></p> <p>The District shall review and ensure compliance to Section 6.5 Librarian Evaluation in the current edition of <i>Mississippi School Library Media Guide</i>.</p> <p>Principals shall evaluate the counselors every year using the <i>Mississippi Counselor Growth Rubric</i> and keep documentation. Every school counselor shall also have a current, signed annual agreement reflecting the school counseling program goals and use of time.</p> <p>Contact Phelton Cortez Moss, Director, Office of Teaching and Leading, Division of Educator Talent Acquisition, at <a href="mailto:PMoss@mdek12.org">PMoss@mdek12.org</a> or 601.359.3631 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standards 3, 3.1, 3.2, 3.3, and 3.4.</p> <p>Contact Elizabeth Simmons, Library Media Specialist, Office of Elementary Education and Reading, at <a href="mailto:ESimmons@mdek12.org">ESimmons@mdek12.org</a> or 601.359.2586 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 3.4 for librarians.</p> <p>Contact Dr. Dana Bullard, Bureau Director, Office of Secondary Education, at <a href="mailto:DBullard@mdek12.org">DBullard@mdek12.org</a> or 601.359.3933 for technical assistance or when the</p>	

<b>FINDINGS</b>	<b>CORRECTIVE ACTION</b>	<b>TIMELINE</b>
	District is prepared for a follow-up visit to verify compliance with Process Standard 3.4 for counselors.	

**Standard 4: The local school board obtains an annual financial audit of the school district, as conducted under the guidelines of the Office of the State Auditor, no later than nine months after the end of the district’s fiscal year.**

- 4.1: The most recent annual financial audit report of the school district, as conducted under the guidelines of the Office of the State Auditor, indicates a fixed asset system of accountability that provides verification of fixed assets and fixed assets records.**
- 4.2: The most recent annual financial audit report of the school district, as conducted under the guidelines of the Office of the State Auditor, indicates no less than a zero fund balance (as defined by generally accepted accounting principles) for all funds of the school district.**
- 4.3: The most recent annual financial audit report of the school district, as conducted under the guidelines of the Office of the State Auditor, verifies the process for distributing Educational Enhancement Fund procurement cards to all eligible teachers.**
- 4.4: The most recent annual financial audit report of the school district, as conducted under the guidelines of the Office of the State Auditor, indicates an unqualified opinion (as defined by generally accepted auditing standards) on the financial statements of the school district.**
- 4.5: The most recent annual financial audit report of the school district, as conducted under the guidelines of the Office of the State Auditor, verifies the local school board has received, reviewed and discussed, as reflected in official minutes of the regularly scheduled monthly meeting, the financial reports required by state law and/or the State Board of Education.**
- 4.6: The most recent annual financial audit report of the school district, as conducted under the guidelines of the Office of the State Auditor, verifies the accuracy and timely compilation and reporting of all financial data, including the year-end data provided through the Financial Exchange Transfer System (FETS), required for submission to the MS Department of Education by the fifteenth day of October, each year, in accordance with state law and/or the State Board of Education.**
- 4.7: The most recent annual financial data of the school district, as submitted to the MS Department of Education, verifies a 7% fund balance of the district maintenance fund.**

**REGULATIONS: Miss. Code Ann. § 7-7-211(e), § 37-9-18(1-2), § 37-17-6(18), § 37-37-7(2)(e), § 37-37-13, §37-61-8, § 37-61-19, § 37-61-21(2), § 37-61-29, § 37-61-33(3)(iii), Miss. Admin. Code 7-3: 10.1 State Board Policy Chapter 10, Rule 10.1, Miss. Admin. Code 7-3: 32.1, State Board Policy Chapter 32, Rule 32.1, Miss. Admin. Code 7-3: 71.1, State Board Policy Chapter 71, Rule 71.3, and 2 C.F.R. § 200**

**SUMMARY of FINDINGS**

- The most recent financial audit report for Noxubee County School District is for Fiscal Year 2015. Audit reports for Fiscal Years 2016, 2017, and 2018 have not been submitted to the Office of the State Auditor by District.
- The District failed to submit their fiscal year audit reports for 2015, 2016, and 2017 by their March 31 deadlines.
- The District reported funds with less than a zero-fund balance for Fiscal Year 2015
- The District received a qualified opinion on the most recent (2015) annual audit.

- The District failed to reflect verification of receipt, review, and discussion of the required financial reports for Fiscal Year 2015.
- The District failed to file year-end financial statements (FETS) with the State Board of Education by October 15, 2015.
- The District did not maintain a 7% fund balance of the district maintenance fund for Fiscal Year 2015.

**Based on the most recent (2015) report from the Office of the State Auditor, the District is COMPLIANT with Process Standards 4.1 and 4.3. Based on the most recent (2015) report from the Office of the State Auditor, the District is NONCOMPLIANT with Process Standards 4, 4.2, 4.4, 4.5, 4.6, and 4.7.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to submit their fiscal year report for 2015, by the March 31, 2016 deadline.</p> <p>The District failed to submit their fiscal year reports for 2016 by the March 31, 2017 deadline.</p> <p>The District failed to submit their fiscal year reports for 2017 by the March 31, 2018 deadline.</p> <p>The most recent report (2015) from the Office of the State Auditor found:</p> <ul style="list-style-type: none"> <li>• The District had deficit fund balances in three (3) funds and are in violation of Miss. Code Ann. § 37-61-19.</li> <li>• The District received a qualified opinion<sup>1</sup> on the most recent financial audit.</li> </ul>	<p>To be compliant with Process Standard 4, the District shall obtain an annual financial audit of the school district for the fiscal year, as conducted under the guidelines of the State Auditor, no later than nine months after the end of the district’s fiscal year.</p> <p>To be compliant with Process Standard 4.2 and Miss. Code Ann. § 37-61-19, the District shall not expend funds in excess of the resources available for the fiscal year.</p> <p>To be compliant with Process Standard 4.4, the District shall obtain an unqualified opinion on the annual financial audit of the school district for the fiscal year.</p> <p>To be compliant with Process Standard 4.5, the District shall prepare minutes of all board meetings that</p>	<p>Immediately and ongoing</p>

<sup>1</sup> A qualified opinion indicates potential problems were detected during the audit process. The auditors gave the District a qualified opinion because they did not have access to the minutes of board meetings for two (2) months, which did not allow them to obtain evidence regarding financial decisions by the Board. Except for that scope limitation, the auditors’ opinion is that the financial statements present fairly, in all material respects, the financial position of the District. The auditor’s opinions pertain to the financial statements, not on the operations of the District.

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• The District cannot verify the local school board has received, reviewed, and discussed the required financial reports due to the minutes of the board meetings not being provided.</li> <li>• The District filed year-end financial statements (FETS) with the State Board of Education on November 9, 2015. Numerous changes were made to the year-end financial statements after that date to complete the financial statements for the annual audit.</li> <li>• The District did not maintain a 7% fund balance.</li> </ul> <p>Note: On June 8, 2018, the Superintendent, requested in writing to MDE Chief Financial Officer, Dr. Felicia Gavin, financial assistance for cash flow purposes in accordance with Miss. Code Ann. § 37-17-6. (See Attachment A)</p>	<p>sufficiently document items brought to the board of education for approval and other significant decisions.</p> <p>To be compliant with Process Standard 4.6 and Miss. Code Ann. § 37-61-21(2), the District shall ensure that all future financial statements are prepared on or before October 15.</p> <p>To be compliant with Process Standard 4.7, the District shall maintain a minimum balance of 7% in the District Maintenance Fund.</p> <p>Contact Brad Feaster, Bureau Director, Office of Internal Audit, at <a href="mailto:BFeaster@mdek12.org">BFeaster@mdek12.org</a> or 601.359.2994 or Donna Nester, Bureau Manager, Office of School Financial Services, at <a href="mailto:DNester@mdek12.org">DNester@mdek12.org</a> or 601.359.3294 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standards 4, 4.2, 4.4, 4.5, 4.6 and 4.7.</p>	

**Standard 5: The most recent annual financial audit report of the school district, as conducted under the guidelines of the Office of the State Auditor, verifies the following:**

- 5.1: The local school board submits the annual budget to the levying authority and the prescribed budgetary information to the MS Department of Education by the fifteenth day of August, each year, in accordance with state law and/or the State Board of Education.**
- 5.2: The local school board budgets and expends funds under the Public School Health Insurance Plan as required by state law and State Board policy. Failure to remit premiums, interest penalties, and/or late charges in a timely manner may result in withholding a school district’s adequate education program funds.**

**REGULATIONS: Miss. Code Ann. §§ 37-61-9(1-3), 37-151-95, and Miss. Admin. Code 7- 3: 48.4, State Board Policy Chapter 48, Rule 48.4**

**SUMMARY of FINDINGS**

- According to the most recent (2015) annual financial report from the Office of the State Auditor, the local school board had inadequate controls concerning budgeting.

**The District is NONCOMPLIANT with Process Standards 5 and 5.1.**

**The District is COMPLIANT on Process Standard 5.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The most recent (2015) report from the Office of the State Auditor found:</p> <ul style="list-style-type: none"> <li>• Inadequate controls concerning budgeting resulted in noncompliance with Miss. Code Ann. §§ 37-61-9 and 37-61-21(1).</li> </ul> <p>Note: On June 8, 2018, the Superintendent, requested in writing to MDE Chief Financial Officer, Dr. Felicia Gavin, financial assistance for cash flow purposes in accordance with Miss. Code Ann. § 37-17-6.</p>	<p>To be compliant with Process Standards 5 and 5.1, the District shall prepare both a combined and a combining budget and obtain Board approval. In addition, the Board should provide documentation of any approved revisions in the minutes of the Board meeting or as an addendum to the board minutes.</p> <p>Contact Brad Feaster, Bureau Director, Office of Internal Audit, at <a href="mailto:BFeaster@mdek12.org">BFeaster@mdek12.org</a> or 601.359.2994 or Donna Nester, Bureau Manager, Office of School Financial Services, at <a href="mailto:DNester@mdek12.org">DNester@mdek12.org</a> or 601.359.3294 for technical assistance or when the</p>	<p>August 15, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
	<p>District is prepared for a follow-up visit to verify compliance with Process Standards 5 and 5.1.</p>	

**Standard 6: The school district complies with state law and State Board of Education policy on enrollment requirements.**

**6.1: Residency requirements**

**REGULATIONS: Miss. Code Ann. § 37-15-29 and Miss. Admin. Code 7-3: 68.1, State Board Policy Chapter 68, Rule 68.1**

**SUMMARY of FINDINGS**

- The MDE monitored five (5) schools: three (3) elementary schools, one (1) middle school, and one (1) high school.
- The District is compliant/had no findings at one (1) school: Noxubee County High School.

**The District is NONCOMPLIANT with Process Standard 6.1.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The MDE reviewed student records for School Year 2017-2018 (i.e. cumulative folders and permanent records) in five (5) schools in the Noxubee County School District. Four (4) of those schools failed to provide the required residency documentation.</p> <p>The District does not have a current policy regarding residency requirements. The most current Board-approved student handbook is from the 2015-2016 school year.</p> <p>The following findings represent a sample of student records reviewed in each school.</p> <p><b><u>Virgil Jones, Jr. Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The MDE reviewed 20 records.</li> <li>• Seventeen (17) of the 20 records reviewed lacked valid proof of residency.</li> </ul>	<p>In order to comply with Miss. Code Ann. § 37-15-29 and Miss. Admin. Code 7-3: 68.1, State Board Policy Chapter 68, Rule, 68.1, the District shall implement a process to verify residency requirements.</p> <p>Current documentation shall be provided by the parent, verified by a district official, signed, dated, and attached to the residency verification form.</p> <p>The District shall implement approved local board policy for residency verification that complies with state law and State Board of Education Policy.</p> <ul style="list-style-type: none"> <li>• An orderly and accurate process for securing proofs of residency shall be instituted. The District shall designate and train staff at each school to implement approved school board policy for residency verification when students initially enroll in the District.</li> <li>• Following appropriate staff training, the District shall review documentation on file for each student</li> </ul>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b><u>B.F. Liddell Elementary</u></b></p> <ul style="list-style-type: none"> <li>• The MDE reviewed 17 records.</li> <li>• Seventeen (17) of the 17 records reviewed lacked valid proof of residency.</li> </ul> <p><b><u>Earl Nash Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The MDE reviewed 40 records.</li> <li>• Four (4) of the 40 records reviewed lacked valid proofs of residency.</li> </ul> <p><b><u>B.F. Liddell Middle School</u></b></p> <ul style="list-style-type: none"> <li>• The MDE reviewed 17 records.</li> <li>• One (1) of the 17 records reviewed lacked valid proof of residency.</li> </ul>	<p>currently enrolled to ensure that two (2) appropriate proofs of residency are on file and verified by the signature of the designated school district official.</p> <ul style="list-style-type: none"> <li>• All enrollment forms, including those used to verify residency shall be completely filled out, and a District official’s signature on these forms is required to validate the information. These forms shall be maintained at the school where the student is enrolled.</li> <li>• After residency has been obtained each year, the documents from previous years shall be removed from the student records and will no longer be acceptable.</li> </ul> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:jmalone@mdek12.org">jmalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 6.1.</p>	

**Standard 6: The school district complies with state law and State Board of Education policy on enrollment requirements.**

**6.2: Immunization requirements**

**REGULATIONS: Miss. Code Ann. § 37-7-301(i), § 37-15-1, and § 41-23-37**

**SUMMARY of FINDINGS**

- The MDE monitored five (5) schools: three (3) elementary schools, one (1) middle school, and one (1) high school.
- The District is compliant/had no findings at two (2) schools: B.F. Liddell Elementary School and Noxubee County High School.

**The District is NONCOMPLIANT with Process Standard 6.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The MDE reviewed student records for School Year 2017-2018 (i.e. cumulative folders and permanent records) in five (5) schools in the Noxubee County School District. Of the five (5) schools monitored, three (3) schools failed to provide the required immunization documentation.</p> <p>The District does not have a current policy regarding immunization requirements. The most current Board-approved student handbook is from the 2015-2016 school year. (<i>See also</i> Standard 6.1)</p> <p>The following findings represent a sample of student records reviewed in each school.</p> <p><b><u>Virgil Jones, Jr. Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The MDE reviewed 20 records.</li> <li>• One (1) of the 20 records reviewed failed to verify immunization compliance.</li> </ul> <p><b><u>Earl Nash Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The MDE reviewed 40 records.</li> </ul>	<p>In order to comply with Miss. Code Ann. § 37-7-301(i), § 37-15-1, and § 41-23-37, the District shall implement a process to verify immunization requirements.</p> <p>The District shall implement approved local board policy for verification of immunization requirements that complies with state law and State Board of Education Policy.</p> <p>All records shall be reviewed to ensure that every student has current and proper immunization documented on the form designated by the Mississippi State Board of Health.</p> <p>Establish a procedure to ensure students who are enrolled with a temporary immunization form complete all immunization requirements within the timelines indicated on the temporary form.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:jmalone@mdek12.org">jmalone@mdek12.org</a> or</p>	<p>November 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>Seven (7) of the 40 records reviewed failed to verify immunization compliance.</li> </ul> <p><b><u>B.F. Liddell Middle School</u></b></p> <ul style="list-style-type: none"> <li>The MDE reviewed 28 records.</li> <li>One (1) of the 28 records reviewed failed to verify the T-DAP immunization compliance.</li> </ul>	<p>601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 6.2.</p>	

**Standard 6: The school district complies with state law and State Board of Education policy on enrollment requirements.**

**6.3: Age of entry requirements**

**REGULATIONS: Miss. Code Ann. § 37-15-9**

**SUMMARY of FINDINGS**

- The MDE monitored three (3) elementary schools: Virgil Jones, Jr. Elementary School, B.F. Liddell Elementary School, and Earl Nash Elementary School.

**The District is NONCOMPLIANT with Process Standard 6.3.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District does not have a current policy regarding age of entry requirements. The most current Board approved student handbook is from the 2015-2016 school year. (See also Process Standards 1 and 1.2)</p>	<p>In order to comply with Miss. Code Ann. § 37-15-9 the District shall implement a process to verify age of entry requirements.</p> <p>The District shall implement approved local board policy for verification of age of entry requirements that complies with state law and State Board of Education Policy.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:jmalone@mdek12.org">jmalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 6.3.</p>	<p>August 31, 2018</p>

**Standard 7: Any transfer student from a school or program (correspondence, tutorial, or home study) not accredited regionally or by a state board of education [or its designee(s)] is given either a standardized achievement test(s) or teacher-made special subject test(s) to determine the appropriate classification of the student within thirty (30) days after filing for transfer. Notice of the administering of such test(s) shall be given to the applicant not less than five (5) days prior to the date of the administration of such test.**

**REGULATIONS: Miss. Code Ann. § 37-15-33 and Miss. Admin. Code 7-3: 36.1-36.4, State Board Policy Chapter 36, Rule 36.1-36.4**

**SUMMARY of FINDINGS**

- District Board policies and student handbooks are not current.

**The District is NONCOMPLIANT with Process Standard 7.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to review, approve, and publish updated policies related to transfer students from a school or program not accredited regionally or by a state board of education. The most current edition of the student handbook was for the 2015-2016 school year. (See also Process Standards 1 and 1.2)</p>	<p>The District shall review and revise all district policies and publications to ensure that all statements are clearly written and consistent with approved school board policy as well as state and federal statutes.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a>, or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 7.</p>	<p>November 30, 2018</p>

**Standard 8: Permanent records and cumulative folders for individual students contain all required data and are collected, maintained, and disseminated in compliance with state law, the *Family Educational Rights and Privacy Act of 1974*, and the Confidentiality Section of the *Individuals with Disabilities Act, 1997 Amendments*.**

**REGULATIONS: Miss. Code Ann. §§ 37-15-1 through 3, § 37-15-6, § 37-15-10, Appendix E of the *Mississippi Public Schools Accountability Standards, 2018*, and the *Mississippi Cumulative Folders and Permanent Records Manual of Directions***

<b>SUMMARY of FINDINGS</b>
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- The MDE monitored five (5) schools: three (3) elementary schools, one (1) middle school, and one (1) high school.

**The District is NONCOMPLIANT with Process Standard 8.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The MDE reviewed students records for School Year 2017-2018 (i.e. cumulative folders and permanent records) in five (5) schools in the Noxubee County School District. All five (5) schools failed to provide the required documentation to verify compliance with the <i>Mississippi Cumulative Folders and Permanent Records Manual of Directions</i>.</p> <p>The following findings represent a sample of student records reviewed in each school.</p> <p><b><u>Virgil Jones, Jr. Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The MDE reviewed 20 records.</li> <li>• One (1) of the 20 records reviewed failed to record the parents name on the permanent record.</li> </ul> <p><b><u>B.F. Liddell Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The MDE reviewed 18 records.</li> </ul>	<p>In order to comply with Miss. Code Ann. §§ 37-15-1 through 3, § 37-15-6, § 37-15-10, Appendix E of the <i>Mississippi Public Schools Accountability Standards, 2018</i>; and the <i>Mississippi Cumulative Folders and Permanent Records Manual of Directions</i>, the District shall implement a process to ensure each school implements the approved local school board policy.</p> <p>The District shall implement local board policies that comply with accreditation standards, state law, SBE policy and federal requirements regarding the collection, maintenance, and dissemination of cumulative folders and permanent records.</p> <ul style="list-style-type: none"> <li>• The permanent record, as the transcript for students enrolling in post-secondary education, shall be accurate when recording grades and transferring information.</li> <li>• All student records shall be reviewed and when necessary, corrected according to the <i>Manual of</i></li> </ul>	<p>November 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>One (1) of the 18 records reviewed contained a different address on the cumulative folder than on the permanent record.</li> </ul> <p><b><u>Earl Nash Elementary School</u></b></p> <ul style="list-style-type: none"> <li>The MDE reviewed 39 records.</li> <li>Two (2) of the 39 records reviewed lacked the daily attendance record.</li> <li>One (1) of the 39 records reviewed lacked dates enrolled/withdrawn/graduation.</li> </ul> <p><b><u>B.F. Liddell Middle School</u></b></p> <ul style="list-style-type: none"> <li>The MDE reviewed 29 records.</li> <li>One (1) of the 29 records reviewed lacked enrollment information on the permanent record and cumulative folder.</li> </ul> <p><b><u>Noxubee County High School</u></b></p> <ul style="list-style-type: none"> <li>The MDE reviewed a sample of 12 records for students in Grades 9, 10 and 11.</li> <li>Twelve (12) of the 12 records reviewed lacked standardized test data. (Note: This is in addition to the 117 of 117 senior records that lacked standardized test data. <i>See also</i> Process Standard 14.)</li> <li>Twelve (12) of the 12 records reviewed did not have a complete summary of high school units.</li> <li>Twelve (12) of the 12 records reviewed lacked labels on cumulative folders.</li> </ul>	<p><i>Directions</i> for maintaining cumulative folders and permanent records.</p> <ul style="list-style-type: none"> <li>Staff shall accurately track graduation requirements for all students in Grades 7-12 and ensure cumulative folders and permanent records for all students include complete documentation regarding all courses in which Carnegie units have been earned.</li> <li>Records shall document all assessments taken by the students, including ACT scores and subject area (end-of-course) test scores, using the labels provided to the District. These labels shall be affixed in the appropriate places on the student records.</li> <li>Each counselor, administrator, teacher and/or employee who maintains or is responsible for student records shall be trained by the District on how to ensure accurate student records. The MDE Office of Accreditation’s website has two (2) short videos, <i>Online Tutorials for Cumulative Folders and Permanent Records Part A and B</i>, as well as the online <i>Mississippi Cumulative Folder and Permanent Records Manual</i>. The MDE website link is: <a href="http://www.mde.k12.ms.us/accreditation">http://www.mde.k12.ms.us/accreditation</a>.</li> <li>The central office administration shall conduct a periodic review of records at all schools to ensure records are maintained in accordance with the <i>Mississippi Cumulative Folder and Permanent Records Manual of Directions</i>.</li> </ul> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 8.</p>	

**Standard 9: The school district engages in planning to review the educational status of each school in the district and to address specific actions relative to accreditation and performance separately.**

**REGULATIONS: Miss. Code Ann. § 37-3- 49(2)(e)**

**SUMMARY of FINDINGS**

- The Noxubee County School District does not have a current strategic plan approved by the local school board.

**The District is NONCOMPLIANT with Process Standard 9.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to provide documentation of a current Board approved strategic plan. The most recent strategic plan is dated 2014-2017.</p>	<p>The Superintendent and Board shall implement a strategic planning process that yields a Board approved and updated Strategic Plan for the District.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a>, or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 9.</p>	<p>December 31, 2018</p>

**Standard 10: The school district implements procedures for monitoring and reporting student absences as specified in the Mississippi Compulsory Attendance Law.**

**REGULATIONS: Miss. Code Ann. § 37-13-91, § 37-37-7(2)(b), (c), and (d), § 37-37-13, and Miss. Admin. Code 7-3: 30.1 and 30.2, State Board Policy, Chapter 30, Rule 30.1 and 30.2**

**SUMMARY of FINDINGS**

- The Noxubee County School District’s attendance policy does not align with Miss. Code Ann. § 37-13-91.
- School was not in session; therefore, the MDE conducted a desk audit and reviewed documentation retrieved from the school attendance officer.
- One (1) of the five (5) schools failed to the meet minimum requirements: Noxubee County High School.
- The District is compliant/had no findings at the following four (4) schools: Virgil Jones, Jr. Elementary School, B.F. Liddell Elementary School, Earl Nash Elementary School, and B.F. Liddell Middle School.

**The District is NONCOMPLIANT with Process Standard 10.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District’s attendance guidelines failed to align with state law regarding the compulsory school attendance regulations. The District’s website has three (3) handbooks that reference attendance, and each handbook has different language and requirements.</p> <p><b><u>Noxubee County High School</u></b>            In accordance with Miss. Code Ann. §37-13-91 (6) Noxubee County High School has failed to report student suspensions or student expulsions to the school attendance officer as they occur.</p>	<p>To comply with Miss. Code Ann. § 37-13-91, the District must ensure that all policies regarding compulsory school attendance are aligned with the state law and fulfill the intent of the law.</p> <p>To comply with Miss. Code Ann. § 37-13-91 (6), the District must report suspensions and/or student expulsions, as they occur, to the Mississippi Department of Education’s school attendance officer assigned to the school.</p> <p>Contact Toni Kersh, Bureau Director, Compulsory School Attendance Enforcement, Alternative Education and High School Equivalency Program, at <a href="mailto:TKersh@mdek12.org">TKersh@mdek12.org</a> or 601.359.3178 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 10.</p>	<p>August 31, 2018</p>

**Standard 10: The school district implements procedures for monitoring and reporting student absences as specified in the Mississippi Compulsory Attendance Law.**

**10.1: The most recent annual audit report of the school district, as conducted under the guidelines of the State Auditor’s Office, verifies the accuracy, validity, and timely reporting of all student data submitted to the MDE, including, but not limited to, the electronic transmission of student enrollment, attendance, transportation, absenteeism, graduation, dropouts, and any other student data and administrative functions as deemed necessary.**

**REGULATIONS: Miss. Code Ann. § 37-13-91, § 37-37-7(2)(b), (c), and (d), § 37-37-13, and Miss. Admin. Code 7-3: 30.1 and 30.2, State Board Policy Chapter 30, Rules 30.1 and 30.2**

**SUMMARY of FINDINGS**

- Based on the most recent report from the Office of the State Auditor, the District is noncompliant with Process Standard 10.1.

**The District is NONCOMPLIANT with Process Standard 10.1.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Based on the most recent School Performance Audit (December 5, 2013) published by the Office of the State Auditor, the District is noncompliant with Process Standard 10.1. (See Attachment B.)</p>	<p>To comply with Process Standard 10.1, the District must verify the accuracy, validity, and timely reporting of all student data submitted to the MDE, including, but not limited to, the electronic transmission of student enrollment, attendance, transportation, absenteeism, graduation, dropouts, and any other student data and administrative functions as deemed necessary.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 10.1.</p>	<p>See Attachment B.</p>

**STANDARD 11: The school district develops a plan and implements programs designed to keep students in school and to lower student dropout rates in accordance with Miss. Code Ann. § 37-13-80.**

**REGULATIONS: Miss. Code Ann. § 37-13-80 and Miss. Admin. Code 7-3: 30.5, State Board Policy Chapter 30, Rule 30.5**

**SUMMARY of FINDINGS**

- The MDE monitored the District’s one (1) middle school and one (1) high school: B.F. Liddell Middle School and Noxubee County High School.

**The District is NONCOMPLIANT with Process Standard 11.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to post a district-wide dropout prevention plan on the District’s website.</p> <p>The District failed to produce Board minutes indicating that a district-wide dropout prevention plan has been approved.</p> <p>The District failed to effectively implement policies and procedures to encourage better attendance for students and failed to monitor students using an early warning system. The principal provided an MDE “schools-at-risk action plan” template from 2016 with no steps or actions articulated. Additionally, the high school principal could not recall and/or articulate the schools’ dropout prevention policy.</p> <p>MDE auditors interviewed the principal of the middle school, as the counselor was unavailable. The principal, in his first year at Noxubee County, was familiar with a dropout prevention policy but provided auditors with a copy of a policy adopted in a prior year.</p>	<p>Pursuant to Miss. Code Ann. § 37-13-80 and Miss. Admin. Code 7-3:30.5, State Board Policy Chapter 30, Rule 30.5, the District shall implement programs and policies at all schools within the District to support the District-wide Dropout Prevention Plan. Implementation includes enacting dropout prevention initiatives that focus on the needs of the local educational agencies, establishing policies and procedures that meet the needs of the District, focusing on measurable student-centered goals and objectives, reducing retention rates in Grades K through 2, targeting groups that need additional assistance to meet graduation requirements, initiating recovery programs for students age 17 through 21 who have dropped out, and addressing how students transition into schools from juvenile detention centers and alternative educational settings.</p> <p>Contact Dr. Dana Bullard, Bureau Director, Office of Secondary Education at <a href="mailto:DBullard@mdek12.org">DBullard@mdek12.org</a> 601.359.3933 for technical assistance or when the</p>	<p>November 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
	District is prepared for a follow-up visit to verify compliance with Process Standard 11.	

**Standard 12: There is an organized system to encourage community involvement, parental communication, and business partnerships in school district decision-making. (Districts Meeting the Highest Levels of Performance are exempted.)**

**12.1: A school district that has been designated as Failing (F) as defined by the State Board of Education shall establish a community-based pre-kindergarten through higher education (P-16) council.**

**12.2: A district and/or a school designated as a D or F shall establish a community-based pre-kindergarten through higher education (P-16) council.**

**REGULATIONS: Miss. Code Ann. § 37-7-337 and § 37-18-5(4)**

**SUMMARY of FINDINGS**

- The Noxubee County School District failed to provide documented evidence to substantiate an active P-16 Community Engagement Council.

**The District is NOT COMPLIANT with Process Standard 12.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to provide documented evidence to substantiate an active P-16 Community Engagement Council (e.g., list of the current P16 members with assigned positions, meeting agendas, minutes and sign-in sheets for the 2017-2018 school year, documentation to support the work/or existence of the P-16 council).</p>	<p>The District shall develop a system to encourage community involvement, parental communications, and business partnerships in school district decision-making.</p> <p>The District and/or schools designated as a D or F shall establish a community-based pre-kindergarten through high (P-16) council.</p> <p>Contact Dr. Sonja Robertson, Director, Office of School Improvement at <a href="mailto:srobertson@mdek12.org">srobertson@mdek12.org</a> or 601.359.1003 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 12.</p>	<p>September 30, 2018</p>

**Standard 13: The academic year provides a minimum of 180 teaching days in which both teachers and pupils are in regular attendance for scheduled classroom instruction. Any request for an exception to this standard must be submitted in writing to the Commission on School Accreditation for review and action. If the Governor has declared a disaster emergency or the President of the United States has declared an emergency or major disaster to exist in this state, the local school board may request approval from the State Board of Education to operate the schools in its district for less than one hundred eighty (180) days.**

- 13.1: The teaching day must provide at least 330 minutes of instruction per day.**
- 13.2: The school district must ensure that during the academic school year a minimum of 140 hours of instruction is provided for each Carnegie unit of credit offered and 70 hours for each one-half (½) unit offered, except for remedial instructional programs, dual enrollment/dual credit, correspondence courses, MS Virtual Public School courses, and innovative programs authorized by the State Board of Education.**
- 13.3: No more than two (2) of the 180 days may be 60% days. Both teachers and pupils must be in attendance for not less than 60% of the normal school day.**
- 13.4: The school district schedules preparation for graduation ceremonies in such manner that graduating seniors are absent from classes for no more than three (3) days prior to the end of the school year. (Districts Meeting the Highest Levels of Performance are exempted.)**
- 13.5: The summer school/extended year program [not Extended School Year (ESY) provided through special education programs] meets all applicable requirements of the regular school program.**
  - 13.5.1: Students from other schools enrolled in summer programs provide written approval from the principal of their home schools.**
  - 13.5.2: Students enrolled in an extended year program complete all remaining course/subject requirements/objectives before credit for the course/subject is issued.**
  - 13.5.3: Students enrolled in a summer program are limited to earning one (1) Carnegie unit of credit during a traditional summer school session, which does not apply to extended year programs and approved virtual courses. (Districts Meeting the Highest Levels of Performance may be exempted under Miss. Code Ann. § 37-17-11.)**

**REGULATIONS: Miss. Code Ann. §§ 37-151- 7(3)(d), 37-3-49, 37-13-61 through 69, § 37-17-11, § 37-151-5(j), and § 37-151-7(3)(c)**

## **SUMMARY of FINDINGS**

- The MDE monitored five (5) schools: three (3) elementary schools, one (1) middle school, and one (1) high school.

**The District is NONCOMPLIANT with Process Standards 13, 13.1, 13.2, 13.3, 13.4, and 13.5.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Based on conflicting information provided by the District during the on-site investigative audit and the data reported in MSIS, auditors could not verify that the calendar approved by the Board for the 2017-2018 school year provided 180 school days and contained the minimum required 330 minutes per day of instruction. Additionally, the auditors could not verify that no more than two (2) of the 180 days were 60% days. (See Process Standards 13, 13.1, and 13.3)</p> <p>The District failed to publish current Board policies and student handbooks containing information related to earning Carnegie unit credit. Noncompliance with Process Standard 13.2 also pertains to information in the student handbook regarding Carnegie unit credit. The student handbook states that a student who exceeds 12 unexcused absences may not receive a grade or Carnegie unit credit in the course based on attendance. Districts are prohibited from having an automatic failure policy.</p> <p>The District held graduation ceremonies for Noxubee County High School prior to the last day of school; therefore, the District is noncompliant with Process Standard 13.4.</p> <p>The District provided MDE auditors with inconsistent information regarding summer school. The District provided a document that contained information related to fees of \$400 and \$450 for summer school/extended school year. However, during interviews with staff, staff reported that the fee for summer school was \$200 per student, but was lowered to \$100. One (1) principal reported that they did not have summer school because there were no students.</p>	<p>In order to comply with Miss. Code Ann. §§ 37-13-63 and 37-151-5(j), and Process Standards 13.2, 13.4, and 13.5, the District calendar shall provide 180 teaching days for all students.</p> <p>The District shall ensure a minimum of 330 minutes of instruction are provided each day.</p> <p>The District shall ensure that all students are provided a minimum of 140 hours of instruction for one (1) Carnegie unit credit and 70 hours of instruction for one-half (½) Carnegie unit credit.</p> <p>The District shall revise the 2018-2019 school calendar to ensure that graduation is not held prior to the last day of instruction for students and that no more than three (3) days are used in preparation for graduation ceremonies.</p> <p>The District shall ensure the summer school/extended year program [not Extended School Year (ESY) provided through special education programs] meets all applicable requirements of the regular school program.</p> <p>The District shall ensure that all publications contain current and accurate information that complies with State law and SBE policies.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standards 13.2, 13.4, and 13.5.</p>	<p>November 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The summer school/extended school year information report to the MDE in MSIS does not meet the minimum instructional time to earn the Carnegie unit credit.</p> <p>The District failed to publish current Board policies and student handbooks containing information related to summer school/extended year programs as outlined in Process Standard 13.5.</p>		

**Standard 14: The school district requires each student, in order to receive a high school diploma, to have met the requirements established by its local board of education and by the State Board of Education.**

- 14.1 Each student receiving a standard high school diploma has earned the minimum number of Carnegie units as specified in Appendix A. Students receiving a standard diploma may select from graduation pathways as specified by the local school district's graduation requirements.**
  - 14.1.1 Entering ninth graders in 2005-2006 and ending with incoming ninth graders of 2017-18 are required to have a minimum of 21 Carnegie units as specified in Appendix A-1.**
  - 14.1.2 Entering ninth graders in 2008-2009 and ending with incoming ninth graders of 2017-2018 are required to have a minimum of 24 Carnegie units as specified in Appendix A-2, unless, in accordance with school board policy, their parent/guardian requests to opt the student out of Appendix A-2 requirements. This student would be required to complete the graduation requirements specified in Appendix A-1.**
  - 14.1.3 Entering eleventh graders in 2010-2011 and ending with incoming ninth graders of school year 2016-2017 who chose the Career Pathway Option are required to earn the minimum graduation requirements specified in Appendix A-3. {Miss. Code Ann. § 37-16-7}**
  - 14.1.4 Beginning in school year 2018-2019, all seventh-grade students are required to have an Individual Success Plan (ISP) prior to exiting the seventh grade.**
  - 14.1.5 Innovative Programs**
  - 14.1.6 Early Exit Diploma shall end with incoming 9th graders of school year 2018-2019.**
  - 14.1.7 Entering ninth graders in 2018-2019 and thereafter, are required to have a minimum of 24 Carnegie units as specified in Appendix A-6.**
  - 14.1.8 Entering ninth graders in 2018-2019 and thereafter, are required to have a minimum of 26 Carnegie units and meet additional requirements as specified in Appendix A-7 to earn a Traditional Diploma with a Career and Technical Endorsement.**
  - 14.1.9 Entering ninth graders in 2018-2019 and thereafter, are required to have a minimum of 26 Carnegie units and meet additional requirements as specified in Appendix A-8 to earn a Traditional Diploma with an Academic Endorsement.**
  - 14.1.10 Entering ninth graders in 2018-2019 and thereafter, are required to have a minimum of 28 Carnegie units and meet additional requirements as specified in Appendix A-9 to earn a Traditional Diploma with a Distinguished Academic Endorsement.**
  - 14.1.11 Entering ninth graders with a significant cognitive disability in 2018-2019 and thereafter, are required to have a minimum of 24 Credits as described in Appendix A-10 to earn an Alternate Diploma.**
- 14.2 Each student receiving a standard diploma has met assessment requirements on each of the required end-of-course Subject Area Tests or one of the options in lieu of a passing score.**
- 14.3 Beginning with incoming ninth graders of 2018-2019 each student who has completed the secondary curriculum for special education may be issued a certificate of completion, which states: "This student has successfully completed an Individualized Education Program."**

- 14.4 Ending with the incoming ninth grade class of 2016-2017, each student with disabilities receiving a Mississippi Occupational Diploma has successfully completed all minimum requirements established by the State Board of Education.
- 14.5 The student who fails to meet the graduation requirements is not permitted to participate in the graduation exercises.

**Note:** Students enrolled in grades 7-12 may be awarded a Carnegie unit credit provided the course content is a Carnegie unit bearing course in the current edition of the Approved Courses for the Secondary Schools of Mississippi Manual.

**REGULATIONS:** Miss. Code Ann. § 37-16-7 and §§ 37-16-11(1)(2), Miss. Admin. Code 7-3: 28.2-28.3, State Board Policy Chapter 28, Rules 28.2-28.3, Miss. Admin. Code 7-3: 34.1, State Board Policy Chapter 34, Rule 34.1, Miss. Admin. Code 7-3: 36.1-36.4, State Board Policy Chapter 36, Rules 36.1-36.4, Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19 and Appendices A-1, A-2, A-3, A-4, A-5, A-6, A-7, A-8, A-9, A-10, A-11, and G of the *Mississippi Public School Accountability Standards, 2018*, and 34 C.F.R. §§ 300.320(b), 300.324(c)

**SUMMARY of FINDINGS**

- Noxubee County High School is noncompliant with Process Standards 14, 14.1, 14.2 and 14.5.
- Of the 117 graduating seniors for School Year 2017-2018, 24 failed to meet graduation requirements; however, the District allowed those students to participate in graduation exercises.
- Two (2) graduates failed to meet the minimum number of Carnegie units.
- Twenty-two (22) graduates failed to achieve a passing score on at least one (1) of the required end-of-course Subject Area Tests or meet one (1) of the options in lieu of passing score.
- The Office of Secondary Education could not evaluate Process Standard 14.1.4 after two (2) attempts to meet with the school counselor at B.F. Liddell Middle School.
- The Office of Special Education could not audit Process Standards 14.3 and 14.4 due to time restrictions.

The District is **NONCOMPLIANT** with Process Standards 14, 14.1, 14.2 and 14.5.

The MDE did not evaluate Process Standards 14.1.4, 14.3 and 14.4.

FINDINGS	CORRECTIVE ACTION	TIMELINE
The MDE reviewed the records of 117 graduating seniors at Noxubee County High School for School Year 2017-2018. The District listed 118 students on the Commencement Program. One student listed on the	In order to comply with Miss. Code Ann. § 37-16-7, § 37-16-11(1), § 37-16-11(2), and § 37-16-7; Miss. Admin. Code 7-3: 28.2-28.3, State Board Policy Chapter 28, Rules 28.2-28.3; Miss. Admin. Code 7-3: 36.1-36.4; Appendices A-1, A-2, A-3, A-4, A-5, A-6, A-7, A-8, A-	August 2018 – May 2019

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Commencement Program could not be identified in MSIS.</p> <p>The District failed to publish current and consistent information in Board policy and student handbooks regarding graduation requirements.</p> <p>The District failed to provide documentation to verify all graduating seniors earned the minimum number of Carnegie units and/or met all four (4) end-of-course Subject Area Tests.</p> <ul style="list-style-type: none"> <li>• The District allowed two (2) students who did not earn the minimum number of Carnegie units required for graduation to graduate and participate in graduation exercises. (Process Standard 14.1)</li> <li>• The District allowed twenty-two (22) students who did not pass all four (4) end-of-course Subject Area Tests or meet one of the options outlined in Appendix A-5 of the <i>Mississippi Public School Accountability Standards, 2018</i>, in lieu of a passing score, to graduate and participate in graduation exercises. (Process Standard 14.2)</li> <li>• The District allowed 24 students to participate in graduation exercises without documentation to support that they had met the minimum graduation requirements outlined in Process Standards 14.1 and 14.2. (See Process Standard 14.5)</li> </ul> <p>All 117 senior records reviewed lacked the following:</p> <ul style="list-style-type: none"> <li>• Grade labels on cumulative folders,</li> <li>• Summary of Carnegie units earned on transcript, and</li> </ul>	<p>9, A-10, A-11, and G of the <i>Mississippi Public School Accountability Standards, 2018</i>, the District shall ensure that each student receiving a high school diploma has met the requirements established by its local Board and by the State Board of Education.</p> <p>The District shall review and revise local board policies and student handbooks to ensure the accuracy and consistency of information provided to staff, parents, and student regarding graduation requirements.</p> <p>District staff shall conduct training regarding graduation requirements and ensure that persons responsible implement local and State Board of Education policy and state statute.</p> <p>The District shall develop an individualized schedule for each student during his/her freshman, sophomore, junior, and senior years to ensure all graduation requirements are met. This four (4) year plan shall be developed with the student and his/her parents during the student’s Grade 8 year and shall be reviewed and revised annually, if applicable.</p> <p>The District shall require the high school to review the records of all seniors for the School Year 2018-2019 to ensure the students are enrolled in the appropriate classes and are provided all testing/retesting opportunities.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a> or 601.359.3764 for technical assistance.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>Score reports/labels for all four (4) end-of-course Subject Area Tests</li> </ul>		

**Standard 15: The school district implements a professional development program aligned with the *Learning Forward Standards for Professional Learning*. (Districts Meeting the Highest Levels of Performance are exempted.)**

**REGULATIONS: Miss. Code Ann. § 37-17-8 and Miss. Admin. Code 7-3: 44.1, State Board Policy Chapter 44, Rule 44.1**

**SUMMARY of FINDINGS**

- The MDE monitored three (3) elementary schools, one (1) middle school, and one (1) high school.

**The District is NONCOMPLIANT with Process Standard 15.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b><u>Virgil Jones, Jr. Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The school failed to provide the 2017-2018 Professional Development Calendar;</li> <li>• The school failed to provide a schedule of regularly scheduled professional development meetings;</li> <li>• The school failed to provide agendas of regularly scheduled professional development meetings;</li> <li>• The school failed to provide sign-in sheets for regularly scheduled professional development meetings;</li> <li>• The school failed to provide a list of teacher committee assignments to various leadership teams;</li> <li>• The school failed to provide a school schedule that reflects leadership team meeting times;</li> <li>• The school failed to provide a copy of the evaluation of the 2016-2017 Professional Development Plan; and</li> <li>• The school failed to provide data that supports the goals for the 2017-2018 Professional Development Plan.</li> </ul>	<p>Pursuant to Miss. Code Ann. § 37-17-8 and Miss. Admin. Code 7-3: 44.1, State Board Policy Chapter 44, Rule 44.1, the school district implements a professional development program aligned with the <i>Learning Forward Standards of Professional Learning</i>.</p> <p>Administration shall provide the following documentation for the 2018-2019 school year to verify professional development program implementation:</p> <ul style="list-style-type: none"> <li>• District Professional Development Plan</li> <li>• Professional Development Calendar</li> <li>• Schedule of regularly scheduled professional development meetings</li> <li>• Agendas of regularly scheduled professional development meetings</li> <li>• Sign-in sheets for regular scheduled professional development meetings</li> <li>• List of teacher committee assignments to various leadership teams</li> <li>• School schedule that reflects leadership meeting times</li> <li>• Sign-in sheets that include administration signatures</li> </ul>	<p>November 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b><u>B. F. Liddell Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The school failed to provide the 2017-2018 Professional Development Calendar;</li> <li>• The school failed to provide a schedule of regularly scheduled professional development meetings;</li> <li>• The school failed to provide agendas of regularly scheduled professional development meetings;</li> <li>• The school failed to provide sign-in sheets for regularly scheduled professional development meetings;</li> <li>• The school failed to provide a list of teacher committee assignments to various leadership teams;</li> <li>• The school failed to provide a school schedule that reflects leadership team meeting times;</li> <li>• The school failed to provide a copy of the evaluation of the 2016-2017 Professional Development Plan; and</li> <li>• The school failed to provide data that supports the goals for the 2017-2018 Professional Development Plan.</li> </ul> <p><b><u>Earl Nash Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The school failed to provide agendas of regularly scheduled professional development meetings;</li> <li>• The school failed to provide a list of teacher committee assignments to various leadership teams; and</li> <li>• The school failed to provide a copy of the evaluation of the 2016-2017 Professional Development Plan.</li> </ul> <p><b><u>B. F. Liddell Middle School</u></b></p> <ul style="list-style-type: none"> <li>• The school failed to provide the 2017-2018 Professional Development Calendar;</li> <li>• The school failed to provide a schedule of regularly scheduled professional development meetings;</li> </ul>	<p>in professional development meetings</p> <ul style="list-style-type: none"> <li>• Copy of the evaluation of the 2017-2018 Professional Development Plan</li> <li>• Data that supports the goals for the 2018-2019 Professional Development Plan</li> </ul> <p>Contact Wendy Clemons, Director of Professional Development, at <a href="mailto:WClemons@mdek12.org">WClemons@mdek12.org</a> or 601.359.2869 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 15.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• The school failed to provide agendas of regularly scheduled professional development meetings;</li> <li>• The school failed to provide sign-in sheets for regularly scheduled professional development meetings;</li> <li>• The school failed to provide a list of teacher committee assignments to various leadership teams;</li> <li>• The school failed to provide a school schedule that reflects leadership team meeting times;</li> <li>• The school failed to provide a copy of the evaluation of the 2016-2017 Professional Development Plan; and</li> <li>• The school failed to provide data that supports the goals for the 2017-2018 Professional Development Plan.</li> </ul> <p><b><u>Noxubee County High School</u></b></p> <ul style="list-style-type: none"> <li>• The school failed to provide the 2017-2018 Professional Development Calendar;</li> <li>• The school failed to provide a schedule of regularly scheduled professional development meetings;</li> <li>• The school failed to provide agendas of regularly scheduled professional development meetings;</li> <li>• The school failed to provide sign-in sheets for regularly scheduled professional development meetings;</li> <li>• The school failed to provide a list of teacher committee assignments to various leadership teams;</li> <li>• The school failed to provide a school schedule that reflects leadership team meeting times;</li> <li>• The school failed to provide a copy of the evaluation of the 2016-2017 Professional Development Plan; and</li> <li>• The school failed to provide data that supports the</li> </ul>		

<b>FINDINGS</b>	<b>CORRECTIVE ACTION</b>	<b>TIMELINE</b>
goals for the 2017-2018 Professional Development Plan.		

**Standard 16: The school district adheres to all requirements of the Mississippi Statewide Assessment System.**

**REGULATIONS: Miss. Code Ann. §§ 37-16-1 through 4, § 37-16-9, Miss. Admin. Code 7-3: 36.1, State Board Policy Chapter 36, Rule 36.1, Miss. Admin. Code 7-3: 74.2, State Board Policy Chapter 74, Rule 74.2, Miss. Admin. Code 7-3: 78.1 and 78.7, State Board Policy Chapter 78, Rule 78.1 and Rule 78.7, and Appendix F of the *Mississippi Public School Accountability Standards, 2018***

**SUMMARY of FINDINGS**

- The Noxubee County School District is compliant based on a limited test-security audit that was conducted in Summer of 2018.

**The District is COMPLIANT with Process Standard 16.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
Note: The District is compliant based on the limited test-security audit that MDE conducted in July, 2018. Data forensics from Caveon from the Spring, 2018 test administrations were unavailable at the time of the audit.	N/A	N/A

**Standard 17: The school district is in compliance with state and/or federal requirements for the following programs:**

**17.1: Early Childhood Programs (kindergarten and teacher assistant) [Districts Meeting the Highest Levels of Performance are exempted from provisions of subsection (4) of Miss. Code Ann. § 37-21-7.]**

**REGULATIONS. Miss. Code Ann. § 37-21-1, et seq., § 37-21-7, Miss. Admin. Code 7-3: 42.1, State Board Policy Chapter 42, Rule 42.1, Miss. Admin. Code 7-3: 62.6, State Board Policy Chapter 62, Rule 62.6, and the *Mississippi Kindergarten Guidelines*.**

**SUMMARY of FINDINGS**

- Two (2) elementary schools serve kindergarten students: Virgil Jones, Jr. Elementary and Earl Nash Elementary. The MDE monitored both schools.
- The MDE reviewed 100% of the student files for each classroom.

**The District is NONCOMPLIANT with Process Standard 17.1.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b><u>Virgil Jones, Jr. Elementary</u></b></p> <ul style="list-style-type: none"> <li>• The school failed to place safety covers in all unused sockets.</li> <li>• The school failed to document professional development provided to assistant teachers, teachers, and administrators.</li> <li>• The school failed to integrate in their lesson plans:               <ul style="list-style-type: none"> <li>○ Language arts, music, math, social studies, science, physical activities, art and dramatic play;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• As required by the <i>Mississippi Kindergarten Guidelines (2015), Section II, A1a, page 10</i>, place safety covers on all sockets that aren't in use.</li> <li>• As required by the <i>Mississippi Kindergarten Guidelines (2015), Section III, C2, page 17</i>, schools must provide regular training related to principles and methods of early childhood education and reading instruction for all teachers, assistant teachers, and administrators.</li> <li>• As required by the <i>Mississippi Kindergarten Guidelines (2015), Section IV, A1, page 17</i>, include art, science, social studies, music, physical activities and dramatic play into daily lesson plans; as required by the <i>Mississippi Kindergarten Guidelines (2015), Section IV, A3a, page 17</i>, plan for and include manipulatives and creative art materials in small group and learning</li> </ul>	<p>August 31, 2018</p> <p>December 28, 2018</p> <p>November 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>○ or provide fiction and non-fiction books, manipulatives, writing materials and creative art materials accessible to students;</li> <li>○ and a minimum of three (3) learning centers accessible for simultaneous use by students for 120 minutes per day of learning center play.</li> </ul> <ul style="list-style-type: none"> <li>● The school failed to conduct hearing and vision screenings on all kindergarten students within the first 30 days of enrollment.</li> <li>● The school failed to plan evaluations of student progress using MDE standards for social/emotional development.</li> <li>● The school failed to provide parents a 2017-2018 parent handbook.</li> <li>● The school failed to meet teacher qualification requirement for one kindergarten teacher.</li> </ul>	<ul style="list-style-type: none"> <li>● center activities. Make fiction and non-fiction books available at every learning center; as required by the <i>Mississippi Kindergarten Guidelines (2015), Section IV, A3c, page 18</i>, revise the daily kindergarten schedule to include three (3) learning centers for use by students for at least 120 minutes of simultaneous use.</li> <li>● As required by the <i>Mississippi Kindergarten Guidelines (2015), Section IV A3c, page 18</i>, conduct hearing and vision screenings on all kindergarten students who haven't yet been screened. For the 2018-2019 school year, conduct hearing and vision screening on all kindergarten students within the first 30 days of school.</li> <li>● As required by the <i>Mississippi Kindergarten Guidelines (2015), Section IV C3, page 19</i>, revise the assessment process to include observations and evaluation of the student's social-emotional needs based on published MDE standards.</li> <li>● As required by the <i>Mississippi Kindergarten Guidelines (2015), Section V, A1, page 19</i>, revise the 2018-2019 parent handbook to include kindergarten philosophy, goals, and specific kindergarten information and provide the handbook to parents.</li> <li>● As required by the <i>Mississippi Kindergarten Guidelines (2015), Section III, B2, C1a, page 16</i>, public school kindergarten teachers must hold one of the following endorsements: Pre-K – K (153), Elementary Education K – 3 (116), Elementary Education K -4 (152), Elementary Education K – 6 (120), Elementary Education K – 9 (115), or Nursery – Kindergarten (151).</li> </ul>	<p>November 30, 2018</p> <p>November 30, 2018</p> <p>November 30, 2018</p> <p>November 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>The school failed to repair/remove broken equipment making it unsafe for use by students.</li> <li>The school failed to provide physical activity for a minimum of thirty (30) minutes during the school day.</li> </ul>	<ul style="list-style-type: none"> <li>As required by the <i>Mississippi Kindergarten Guidelines (2015), Section II, B2, page 15</i>, repair/remove broken swings from play area.</li> <li>As required by the <i>Mississippi Kindergarten Guidelines (2015), Section III, A3, page 16</i>, students shall participate in physical activity for a minimum of 30 minutes during the school day, in accordance with MS Code 37-13-134. The teacher’s schedule or master schedule should reflect physical activity time for all kindergarten students.</li> </ul>	<p>November 30, 2018</p> <p>November 30, 2018</p>
<p><b><u>Earl Nash Elementary</u></b></p> <ul style="list-style-type: none"> <li>The school failed to place safety covers in all unused sockets.</li> <li>The school failed to conduct hearing and vision screenings on all kindergarten student within the first 30 days of enrollment</li> <li>The school failed to repair/remove broken equipment making it unsafe for use by students.</li> <li>The school failed to document professional development provided to assistant teachers, teachers, and administrators.</li> <li>The school failed to integrate in their lesson plans:</li> </ul>	<ul style="list-style-type: none"> <li>As required by the <i>Mississippi Kindergarten Guidelines (2015), Section II, A1a, page 10</i>, place safety covers on all sockets that aren’t in use.</li> <li>As required by the <i>Mississippi Kindergarten Guidelines (2015) Section IV A3c, page 18</i>, conduct hearing and vision screenings on all kindergarten students who haven’t yet been screened. For the 2018-2019 school year, conduct hearing and vision screening on all kindergarten students within the first 30 days of school.</li> <li>As required by the <i>Mississippi Kindergarten Guidelines (2015), Section II, B2, page 15</i>, repair/remove broken swing and add mulch to play area. Remove logs from exterior of the playground.</li> <li>As required by the <i>Mississippi Kindergarten Guidelines (2015), Section III, C2, page 17</i>, schools must provide regular training related to principles and methods of early childhood education and reading instruction for all teachers, assistant teachers, and administrators.</li> <li>As required by the <i>Mississippi Kindergarten Guidelines (2015), Section IV, A1, page 17</i>,</li> </ul>	<p>August 31, 2018</p> <p>November 30, 2018</p> <p>November 30, 2018</p> <p>December 28, 2018</p> <p>November 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>○ thematic units across kindergarten subjects;</li> <li>○ small group, whole group, individual instruction, and learning centers</li> <li>○ music, art, social studies, science, and dramatic play.</li> </ul> <ul style="list-style-type: none"> <li>● The school failed to plan evaluations of students' progress using MDE standards for social/emotional development.</li> <li>● The school failed to provide parents the 2017-2018 parent handbook.</li> <li>● The school failed to schedule two (2) parent-teacher conferences.</li> <li>● The school failed to provide a schedule to show kindergarten students do not share an area with students grade three or above during designated outside play periods.</li> </ul>	<p>redesign lesson plan template to integrate all kindergarten subjects that align to a thematic unit.</p> <ul style="list-style-type: none"> <li>● As required by the <i>Mississippi Kindergarten Guidelines (2015), Section IV C3, page 19</i>, revise the assessment process to include observations and evaluation of the student's social-emotional needs based on published MDE standards.</li> <li>● As required by the <i>Mississippi Kindergarten Guidelines (2015), Section V, A1, page 19</i>, revise the 2018-2019 parent handbook to include kindergarten philosophy, goals, and specific kindergarten information accessible to parents.</li> <li>● As required by the <i>Mississippi Kindergarten Guidelines (2015), Section V, A2, page 20</i>, distribute the schedule for two (2) parent-teacher conferences to parents at the beginning of the year.</li> <li>● As required by the <i>Mississippi Kindergarten Guidelines (2015), Section II, B1, page 15</i>, a master schedule/teacher schedule shall be provided to show that kindergarten students do not simultaneously share an area with students in grades three or above during designated outside periods.</li> </ul>	<p>November 30, 2018</p> <p>November 30, 2018</p> <p>November 30, 2018</p> <p>November 30, 2018</p>

**Standard 17: The school District is in compliance with state and/or federal requirements for the following programs:**

**17.2: Early Childhood Programs (pre-kindergarten and teacher assistant) [Districts Meeting the Highest Levels of Performance are exempted from provisions of subsection (4) of Miss. Code Ann. § 37-21-7.]**

**REGULATIONS. Pre-Kindergarten Miss. Code Ann. § 37-7-301(ss), Miss. Admin. Code 7-3: 28.4, State Board Policy Chapter 28, Rule 28.4, Refer to the *Mississippi Early Learning Guidelines for classrooms serving Three- and Four-Year-Old Children*, Miss. Code Ann. § 37-7-301 (zz)**

**SUMMARY of FINDINGS**

- The District has one (1) elementary school with pre-kindergarten classrooms: Earl Nash Elementary. The MDE monitored this school.
- The MDE reviewed 100% of the student files for each classroom.

**The District is NONCOMPLIANT with Process Standard 17.2**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b><u>Earl Nash Elementary</u></b></p> <ul style="list-style-type: none"> <li>• The school failed to place safety covers in all unused sockets.</li> <li>• The school failed to document 15 hours of professional development provided to assistant teachers, teachers, and administrators.</li> </ul>	<ul style="list-style-type: none"> <li>• As required by the <i>Mississippi Early Learning Guidelines (2018), Section V, A1.a.i.6, page 22</i>, place safety covers on all sockets that aren't in use.</li> <li>• As required by the <i>Mississippi Early Learning Guidelines (2018), Section III, B3, page 19</i>, all teachers, assistant teachers, and program administrators must complete at least fifteen (15) hours of professional development annually. The District/school shall develop a calendar of professional development specific to early childhood topics that includes dates, times and signatures of participants.</li> </ul>	<p>August 31, 2018</p> <p>December 28, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• The school failed to integrate their lesson plans in a unit/thematic format to include: <ul style="list-style-type: none"> <li>○ Language arts, music, math, social studies, science, approaches to learning, physical activities, art and dramatic play;</li> <li>○ or provide individual instructional activities;</li> <li>○ and a minimum of five (5) learning centers accessible for simultaneous use by children in the lesson plan.</li> </ul> </li>   <li>• The school failed to conduct hearing and vision screenings on all pre-kindergarten children within the first 30 days of enrollment.</li>   <li>• The school failed to use a variety of techniques, procedures, and tools to determine individual students’ social, emotional, and academic enrichment needs.</li>   <li>• The school failed to provide parents the 2017-2018 parent handbook.</li>   <li>• The school failed to conduct at least three (3) parent/teacher conferences during the 2017-2018 school year.</li> </ul>	<ul style="list-style-type: none"> <li>• As required by the <i>Mississippi Early Learning Guidelines (2018), Section II, A2a, page 2</i>, include art, science, social studies, music, physical activities, approaches to learning, and dramatic play into daily lesson plans; as required by the <i>Mississippi Early Learning Guidelines (2018), Section II, A2a, page 3</i>, revise the daily pre-kindergarten lesson plan and schedule to include five (5) learning centers for use by children for at least 120 minutes of simultaneous use.</li>   <li>• As required by the <i>Mississippi Early Learning Guidelines (2018), Section II, C1, page 5</i>, conduct hearing and vision screenings on all pre-kindergarten children. For the 2018-2019 school year, conduct hearing and vision screening on all kindergarten children within the first 45 days of school.</li>   <li>• As required by the <i>Mississippi Early Learning Guidelines (2018), Section II, C1, page 5</i>, conduct physical or developmental screening on all pre-kindergarten children and make all necessary referrals within 30 days of the initial screening.</li>   <li>• As required by the <i>Mississippi Early Learning Guidelines (2018), Section IV, A1, page 20</i>, revise the 2018-2019 parent handbook to include pre-kindergarten philosophy, goals, and specific pre-kindergarten information and make it accessible to parents.</li>   <li>• As required by the <i>Mississippi Early Learning Guidelines (2018), Section IV, A2, page 20</i>, the District/school shall schedule three (3) parent/teacher conferences and distribute the schedule to parents at the beginning of the year.</li> </ul>	<p>November 30, 2018</p>  <p>November 30, 2018</p> <p>November 30, 2018</p> <p>November 30, 2018</p> <p>November 30, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>The school failed to have a defined boundary between the designated outside play area, the driveway and parking lot. Broken equipment made it unsafe for use by children.</li> <li>The school failed to provide a schedule to show pre-kindergarten students do not share an area with students age six (6) or older during designated outside play periods.</li> <li>The District/school failed to meet the teacher-pupil ratio of 2:20.</li> <li>The District/school failed to produce updated immunization forms for all pre-kindergarten students.</li> <li>The District/school failed to permit the opening of a locked toilet room door from the outside.</li> </ul>	<ul style="list-style-type: none"> <li>As required by the <i>Mississippi Early Learning Guidelines (2018), Section V, B1a.i. 3-5, page 30</i>, repair/remove broken swings from play area, remove logs from playground exterior, and install a boundary/walk-way from the pre-kindergarten building to the play area and cafeteria through the driveway and parking lot. Boundary shall prevent a child from accessing parking lot/driveway, prevent an automobile from entering travel/play space, and protect children from environmental hazards. Repair/replace broken equipment.</li> <li>As required by the <i>Mississippi Early Learning Guidelines (2018), Section V, B1a.i. 1</i>, a master schedule/teacher schedule shall be provided to show that pre-kindergarten does not simultaneously share an area with children age six (6) or older during designated outside play periods.</li> <li>As required by the <i>Mississippi Early Learning Guidelines (2018), Section I, A1</i>, the District/school pre-kindergarten enrollment for 2018-2019 shall not exceed 1:10 or 2:20.</li> <li>As required by the <i>Mississippi Early Learning Guidelines (2018), Section I, A1</i>, the District/school must review files to ensure that all required immunization forms are present and up-to-date.</li> <li>As required by the <i>Mississippi Early Learning Guidelines (2018), Section V, A1b.i.2</i>, the District/school must remove locks from toilet room doors to allow the opening from the outside in case of an emergency.</li> </ul>	<p>November 30, 2018</p>

**Standard 17: The school district is in compliance with state and/or federal requirements for the following programs:**

**17.3: Career-Technical Education**

**REGULATIONS: Miss. Code Ann § 37-31-1, et seq., Miss. Admin. Code 7-3: 83-96, State Board Policy Chapters 83-96, and Federal Code**

**SUMMARY of FINDINGS**

- The MDE monitored 12 programs and 10 instructors at the Noxubee County Career and Technical Center.

**The District is NONCOMPLIANT with Process Standard 17.3.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The School failed to maintain an accurate inventory of equipment.</p> <ul style="list-style-type: none"> <li>• The school could not account for the Kodak digital camera assigned to the CTE Director. It was missing and allegedly had been reported stolen to the authorities. However, the school failed to provide any documentation.</li> <li>• Student Services Coordinator could not account for the Brother printer assigned to them. The school failed to provide any documentation.</li> <li>• The Health Services program could not account for the Kodak digital camera assigned to them</li> <li>• The school could not account for the JVC digital camera/recorder, Macintosh notebook computer, Cannon digital camera, and Apple minicomputer. These items were said to be “checked out” to the Mechanical Engineering teacher but the school failed to provide any documentation.</li> </ul> <p>The office of the metal fabrication program had a leak.</p>	<p>Pursuant to Miss. Code Ann. §37-31-205(k), the local educational agency shall follow procedures for maintaining a correct, current, and complete inventory control system for all capitalized equipment, and for any disposition of equipment to include transfer, salvage, and abandonment to be compliant.</p> <p>Pursuant to Miss. Code Ann. § 37-7-301(c) (d) and (j); § 37-11-5, § 37-11-49; and § 45-11-101, the school district shall provide clean and sanitary facilities in a safe and secure environment. All classrooms in each school will be air conditioned.</p> <p>Outdated equipment and debris located in both metal fabrication and construction areas should be removed.</p> <p>Contact Jennifer Nance, Office Director, Office of Career and Technical Education, Office of Secondary Education, at <a href="mailto:Jennifer.Nance@mdek12.org">Jennifer.Nance@mdek12.org</a> or 601.359.3461 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 17.3.</p>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The school failed to use a color coding scheme for safety purposes in the metal fabrication classroom/lab.</p> <p>The school failed to post safety or hazard signs in the construction or metal fabrication classrooms/labs.</p> <p>Outdated equipment and debris located in both metal fabrication and construction areas pose safety concerns.</p>		

**Standard 17: The school district is compliant with State and/or Federal requirements for the following programs:**

**17.4: Special Education *Individuals with Disabilities Education Act* (IDEA) (20 U.S.C §§ 1400, *et. seq.*)**

**REGULATIONS: Child Find – Initial Evaluation (CFI): 34 C.F.R. §§ 300.111, 300.301, 300.304 – 300.311; Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.111, 300.301, 300.304 – 300.311**

**SUMMARY of FINDINGS**

- The MDE Office of Special Education (OSE) selected student records from the District’s teacher’s roster. The findings of noncompliance are representative of the District’s Child Find process.
- The MDE assigned student codes for each student record reviewed based on the school where the child received services at the time of the on-site visit.

**The District is NONCOMPLIANT with Process Standard 17.4.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The MDE reviewed 31 student records, which included 6 student records in the area of Child Find-Initial (CFI). Special education records, district documents including Teacher Support Team (TST) documentation, and interviews with District personnel indicated:</p> <p><b>CFI-1</b>  <b>C.F.R. §§ 300.111, 300.307; Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.111, 300.307</b></p> <ul style="list-style-type: none"> <li>• Two (2) of six (6) student records indicated the District failed to document evidence to determine if scientific research-based interventions were provided to students who were performing below average on grade-level standards (Students 17 and 21)</li> </ul>	<ul style="list-style-type: none"> <li>• Review and, as necessary, revise written Child Find policies and procedures for conducting initial evaluations to ensure the policies and procedures reflect all required components of the IDEA, the IDEA’s implementing regulations, Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, and pp. 291-335 <i>Special Education Eligibility Determination Guidelines</i>. The review and revisions shall be documented and submitted to the MDE for approval.</li> <li>• Provide training in Child Find identification for all appropriate personnel including, but not limited to, psychometrists, speech-language therapists, and psychologists, Teacher Support Team (TST) chairpersons, and Multidisciplinary Evaluation Team (MET) members.</li> </ul>	<p>Unless otherwise noted in this section of the report, the deadline for the district to complete the corrective actions is October 31, 2018.</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>CFI-3</b>  <b>34 C.F.R. § 300.301(b); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.301(b)</b></p> <ul style="list-style-type: none"> <li>Three (3) of six (6) student records indicated the District does not have a procedure for receiving and documenting verbal and written requests for comprehensive evaluations.  (Students 17, 21, and 23)</li> </ul> <p><b>CFI-4</b>  <b>34 C.F.R. §§ 300.301(b), 300.306(a)(1), 300.308, 300.309(a); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.301(b)(1), 300.306(a)(1), 300.308, 300.309(a)</b></p> <ul style="list-style-type: none"> <li>Three (3) of six (6) student records indicated the District failed to ensure appropriate members of the MET were present at the meeting to consider evaluation data to make an eligibility ruling.  (Students 17, 21, and 23)</li> </ul> <p>The MDE identified three (3) students whose MET:</p> <ul style="list-style-type: none"> <li>Failed to ensure the assessment of all deficit areas;</li> <li>Failed to access information from a variety of sources; or,</li> <li>Failed to ensure the student(s) met the minimum eligibility criteria for determining an appropriate IDEA eligibility in accordance with the IDEA, the IDEA’s implementing regulations, Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, and pp. 291-335, <i>Special Education Eligibility Determination Guidelines</i>.</li> </ul>	<ul style="list-style-type: none"> <li>Provide training on Child Find policies and procedures to administrators, teachers, and other appropriate school personnel to ensure: <ol style="list-style-type: none"> <li>Students who are suspected of having a disability are not denied an evaluation nor experience a delay in receiving an evaluation due to a requirement to participate in a Response to Intervention (RtI) process;</li> <li>The District has a process that allows for receiving and documenting verbal and written requests for comprehensive evaluations;</li> <li>Appropriate members of the MET are present for eligibility determination meetings;</li> <li>Prior Written Notice regarding the MET’s decision is provided to parents within seven (7) days of the MET meeting;</li> <li>Parents are provided a copy of the evaluation report at least seven (7) calendar days prior to the eligibility determination meeting.</li> </ol> </li> </ul> <p>The District shall document and submit evidence of the training (e.g. sign-in sheets, PowerPoint presentations, or agendas) to the MDE for approval.</p> <ul style="list-style-type: none"> <li>Corrective actions related to this finding are individualized. To protect confidentiality, the corrective actions are outlined in detail in Attachment C.</li> </ul> <p>Contact Gretchen Cagle, State Director of Special Education, Office of Special Education, at <a href="mailto:GCagle@mdek12.org">GCagle@mdek12.org</a> or (601) 359-3498 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 17.4.</p>	<p>See Attachment C.</p>

<b>FINDINGS</b>	<b>CORRECTIVE ACTION</b>	<b>TIMELINE</b>
<p>Specific details related to this finding are individualized. To protect confidentiality, additional details of this finding are outlined in detail in Attachment C.</p>		

**Standard 17: The school district is compliant with State and/or Federal requirements for the following programs:**

**17.4: Special Education *Individuals with Disabilities Education Act (IDEA)* (20 U.S.C §§ 1400, *et. seq.*)**

**REGULATIONS: Child Find – Reevaluation (CFR): 34 C.F.R. §§ 300.111, 300.303 – 300.311; Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.111, 300.303 – 300.311**

**SUMMARY of FINDINGS**

- The MDE selected student records from the District’s teacher’s roster. The findings of noncompliance are representative of the District’s Child Find process to determine a child’s continuing need for special education and related services.
- The MDE assigned student codes for each student record reviewed based on the school where the child was receiving services at the time of the on-site visit.

**The District is NONCOMPLIANT with Process Standard 17.4.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The MDE reviewed 31 student records, which included six (6) student IEPs in the area of Child Find-Reevaluation (CFR). A review of special education records, district documents, interviews with district personnel, and classroom observations indicated:</p> <p><b>CFR-3 34 C.F.R. §§ 300.111, 300.303 – 300.311; Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.111, 300.303 – 300.311</b></p> <p>The MDE identified four (4) students whose IEP Committees:</p> <ul style="list-style-type: none"> <li>• Failed to ensure a comprehensive assessment addressing all deficient areas for each individual child; (Student 24)</li> </ul>	<ul style="list-style-type: none"> <li>• Review and revise Child Find policies and procedures for conducting reevaluations to ensure the policies and procedures reflect all required components of the IDEA, the IDEA’s implementing regulations, Miss. Admin. Code 7-3, State Board Policy Chapter 74, Rule 74.19, and pp. 291-335, <i>Special Education Eligibility Determination Guidelines</i>. The review and revisions shall be documented and submitted to the MDE for approval.</li> <li>• Provide training on Child Find-Reevaluation policies and procedures to administrators, teachers, and other appropriate school personnel to ensure:               <ul style="list-style-type: none"> <li>○ Parents and others with knowledge of the student are invited to participate in IEP Committee meetings to discuss and review reevaluation data; and,</li> </ul> </li> </ul>	<p>Unless otherwise noted in this section of the report, the deadline for the district to complete the corrective actions is October 31, 2018.</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• Failed to draw upon information from a variety of sources, including social or cultural background; (Student 11)</li> <li>• Failed to ensure the student(s) met the minimum eligibility criteria for determining an appropriate IDEA eligibility in accordance with the IDEA, the IDEA’s implementing regulations, Miss. Admin. Code 7-3, State Board Policy Chapter 74, Rule 74.19, and pp. 291-335, <i>Special Education Eligibility Determination Guidelines</i>. (Students 18 and 32)</li> </ul> <p>Specific details related to this finding are individualized. To protect confidentiality, additional details of this findings are outlined in detail in Attachment C.</p>	<ul style="list-style-type: none"> <li>• Provide training on Child Find-Reevaluation for Evaluation and Determination of Eligibility policies and procedures to psychometrists and other district assessment personnel to ensure compliant implementation in accordance with Miss. Admin. Code 7-3, State Board Policy Chapter 74, Rule 74.19, and <i>Special Education Eligibility Determination Guidelines</i>. The District shall document and submit evidence of the training (e.g. sign-in sheets, PowerPoint presentations, or agendas) to the MDE for approval.</li> <li>• Corrective actions related to this finding are individualized. To protect confidentiality, the corrective actions are outlined in detail in Attachment C.</li> </ul> <p>Contact Gretchen Cagle, State Director of Special Education, Office of Special Education, at <a href="mailto:GCagle@mdek12.org">GCagle@mdek12.org</a> or (601) 359-3498 for technical assistance or when the district is prepared for a follow-up visit to verify compliance with Process Standard 17.4.</p>	<p>See Attachment C.</p>

**Standard 17: The school district is compliant with State and/or Federal requirements for the following programs:**

**17.4: Special Education *Individuals with Disabilities Education Act (IDEA) (20 U.S.C §§ 1400, et. seq.)***

**REGULATIONS: Individualized Education Programs (IEP), Delivery of Services (DS), Free Appropriate Public Education (FAPE), Least Restrictive Environment (LRE): 34 C.F.R. §§ 300.17, 300.22 – 300.23, 300.34, 300.39, 300.42, 300.43, 300.101 – 300.110, 300.112 – 300.118, 300.320 –300.324; Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.17, 300.22 – 300.23, 300.34, 300.39, 300.43, 300.101 – 300.110, 300.112 – 300.118, 300.320 – 300.324**

**SUMMARY of FINDINGS**

- Prior to the on-site visit, a report, filtered by teacher, was pulled from MSIS for each school.
- The MDE selected student records from the report for each school.
- The MDE assigned student codes for each student record reviewed based on the school where the child was receiving services at the time of the on-site visit.
- The MDE monitored 5 schools: three (3) elementary schools, one (1) middle school, one (1) high school; as well as, one (1) non-public and one (1) Head Start Center.
- The MDE conducted a cyclical monitoring follow-up visit on August 30, 2017 and a follow-up visit on March 23, 2018. The March 23, 2018 visit indicated the following: Students 2, 5, 6, 13, and 14 exited the program. Student 8 is no longer a student in the District.
- During the Investigative Audit, the MDE noted the following student IEPs from the original visit were not updated for the 2018-2019 school year: Students 10, 15, 16, and 28.

**The District is NONCOMPLIANT with Process Standard 17.4.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>On February 7, 2017 and February 8, 2017, the MDE reviewed 15 student records, which included 15 student records in the areas of Individual Education Program (IEP), Delivery of Services (DS), Free Appropriate Public Education (FAPE), and Least Restrictive Environment (LRE). The MDE conducted follow-up visits on August 30, 2017 and March 23, 2018.</p> <p>The MDE conducted an Investigative Audit June 26, 2018 through June 27, 2018 and reviewed 20 additional student</p>	<ul style="list-style-type: none"> <li>• Review and revise written policies and procedures for the development and implementation of IEPs for students with disabilities to ensure the policies and procedures reflect all required components of the IDEA, the IDEA’s implementing regulations, and Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19. The review and revisions shall be documented and submitted to the MDE for approval.</li> </ul>	<p>Unless otherwise noted in this section of the report, the deadline for the district to complete the corrective actions is October 31, 2018.</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>records in the areas of IEP, DS, FAPE, and LRE. A review of special education records, district documents, and interviews with district personnel indicated:</p> <p><b>DS-1</b>  <b>34 C.F.R. § 300.321(a); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.321(a)</b></p> <ul style="list-style-type: none"> <li>Two (2) of thirty-seven (37) student records indicated the District failed to include all required Committee members at the IEP meeting. (Students 17 and 21)</li> </ul> <p><b>DS-2</b>  <b>34 C.F.R. §§ 300.320(a)(1), 300.324(a)(1); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320(a)(1), 300.324(a)(1)</b></p> <ul style="list-style-type: none"> <li>Eight (8) of thirty-seven (37) student records failed to ensure students Present Levels of Academic Achievement and Functional Performance (PLAAFP) provided a detailed and targeted summary of current daily academic and functional performance, including baseline data provided for developing measurable annual goals. (Students 4, 14, 16, 17, 27, 28, 30, and 35)</li> </ul> <p><b>DS-3</b>  <b>34 C.F.R. § 300.320(a)(1)(i); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.320(a)(1)(i)</b></p> <ul style="list-style-type: none"> <li>Six (6) of thirty-seven (37) student IEPs failed to include statements of how the students' disability affects their involvement and progress in the general education curriculum. (Students 11, 14, 16, 27, 28, and 32)</li> </ul>	<ul style="list-style-type: none"> <li>Develop and submit to the MDE a written plan documenting how the District will conduct self-monitored IEP reviews to evaluate IEP development, evaluate implementation, and ensure the provision of a FAPE to each child with a disability.</li> <li>Provide training to administrators, special education teachers, regular education teachers, speech-language therapists, related service providers, and other appropriate personnel regarding required IEP components and development of an IEP that meets the unique needs of the students in accordance with 34 C.F.R. §§ 300.320 – 300.324; and Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320-300.324. This documented training shall address the requirements to review, revise, and develop an IEP annually, to ensure an IEP is in effect at the beginning of each school year, to ensure required committee members are present at IEP meetings, to implement the IEPs by providing the special education and related services documented in each student's IEP, to write IEPs that address the academic, developmental, and functional needs of students, and to include all required components that will meet the unique needs to students, to write IEP goals that are measurable, to identify accommodations and modifications specific to a student, and to provide educational benefit for all students with disabilities enrolled in and served by the district. The District shall document and submit evidence of the training (e.g. sign-in sheets, PowerPoint presentations, or agendas) to the MDE for approval.</li> </ul>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>DS-4</b>  <b>34 C.F.R. § 300.324(a)(1); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.324(a)(1)</b></p> <ul style="list-style-type: none"> <li>Five (5) of thirty-seven (37) student IEPs failed to include at least one or more of the following components: student strengths, the concerns of the parents, results of most recent evaluations, academic needs of the students, or developmental and functional needs. (Students 12, 14, 16, 28, and 35)</li> </ul> <p><b>DS-5</b>  <b>34 C.F.R. §§ 300.320(a)(2), 300.324(b)(1); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320(a)(2), 300.324(b)(1)</b></p> <ul style="list-style-type: none"> <li>Six (6) of thirty-seven (37) student IEPs failed to address the academic areas of need of the students. (Students 16, 17, 24, 28, 31, and 35)</li> </ul> <p><b>DS-6</b>  <b>34 C.F.R. §§ 300.320(a)(2), 300.324(b); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320(a)(2), 300.324(b)</b></p> <ul style="list-style-type: none"> <li>Five (5) of thirty-seven (37) student IEPs failed to address the students' functional areas of need. (Students 12, 16, 28, 36, and 37)</li> </ul> <p><b>DS-7</b>  <b>34 C.F.R. §§ 300.320(a)(2), 300.324(b)(1); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320(a)(2), 300.324(b)(1)</b></p> <ul style="list-style-type: none"> <li>Five (5) of thirty-seven (37) student IEPs failed to state annual goals in measurable terms. (Students 4, 17, 18, 32, and 37)</li> </ul>	<ul style="list-style-type: none"> <li>Reconvene the IEP Committees for students identified in the findings to revise the IEPs to include all required components that will meet the unique needs of the students in accordance with 34 C.F.R. §§ 300.320 – 300.324; and Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320-300.324.</li> <li>Review and, as necessary, revise written policies and procedures to ensure all appropriate personnel including administrators, special education teachers, regular education teachers, speech-language therapists, and related service providers, ensure the provision of a FAPE to students with disabilities in accordance with the IDEA, the IDEA's implementing regulations, and Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19. The review and revisions shall be documented and submitted to the MDE for approval.</li> <li>Provide training to all appropriate personnel including administrators, special education teachers, regular education teachers, speech-language therapists, and related service providers ensure the provision of a FAPE to each child with a disability in accordance with each child's IEP. The training shall ensure building-level principals, instructional staff, general education teachers, and special education teachers understand: <ul style="list-style-type: none"> <li>1) The provision of a FAPE requires special education services and related services provided in accordance with each student's IEP, assistive technology devices and services included in a student's IEP are</li> </ul> </li> </ul>	<p>September 28, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>DS-8</b>  <b>34 C.F.R. §§ 300.320(a)(3), 300.324(b)(1); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320(a)(3), 300.324(b)(1)</b></p> <ul style="list-style-type: none"> <li>Twelve (12) of thirty-seven (37) student IEPs failed to include descriptions of how student progress toward meeting the annual goals will be measured.  (Students 14, 16, 17, 25, 26, 27, 29, 31, 32, 33, 35, and 37)</li> </ul> <p><b>DS-10</b>  <b>34 C.F.R. §§ 300.39(b)(3), 300.320(a)(4); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.39(b)(3), 300.320(a)(4)</b></p> <ul style="list-style-type: none"> <li>Twelve (12) of thirty-seven (37) student IEPs failed to specifically identify the provision of specially-designed instruction, describe the nature of the instruction that aligns with the needs of the child, or support the achievement of annual goals.  (Students 11, 12, 13, 14, 16, 17, 25, 27, 31, 33, 35, and 36)</li> </ul> <p><b>DS-11</b>  <b>34 C.F.R. § 300.320(a)(7); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.320(a)(7)</b></p> <ul style="list-style-type: none"> <li>One (1) of thirty-seven (37) student IEPs failed to list the location for specially-designed instruction.  (Student 27)</li> </ul> <p><b>DS-12</b>  <b>34 C.F.R. § 300.320(a)(7); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.320(a)(7)</b></p>	<p>provided, and students with disabilities are afforded the opportunity to participate with their nondisabled peers in all aspects of the general education environment, including nonacademic and extracurricular activities;</p> <ol style="list-style-type: none"> <li>The remedy available to individual children when the district fails to ensure the implementation of a student’s IEP and the provision of a FAPE; and,</li> <li>Why compensatory services are provided to children with disabilities, the process for determining a student’s need for compensatory services, and the District’s process for documenting the decision-making process used by an IEP Committee when determining compensatory services.</li> </ol> <p>The District shall document and submit evidence of the training (e.g. sign-in sheets, PowerPoint presentations, or agendas) to the MDE for approval.</p> <ul style="list-style-type: none"> <li>Develop or review and, as necessary, revise procedures to review all student IEPs to ensure that the areas of noncompliance found in this report are not present in current IEPs which were not reviewed during this audit. The creation, review, revisions, and tracking system shall be documented and submitted to the MDE for approval.</li> <li>Provide training to appropriate personnel regarding the required components of transition plans in accordance with IDEA, the IDEA’s implementing regulations, and Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19. The district</li> </ul>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>Six (6) of thirty-seven (37) student IEPs failed to list the frequency or the duration of services. (Students 12, 13, 15, 17, 31, and 36)</li> </ul> <p><b>DS-13</b>  <b>34 C.F.R. § 300.42, 300.320(a)(4); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.320(a)(4)</b></p> <ul style="list-style-type: none"> <li>Six (6) of thirty-seven (37) student IEPs failed to identify the supplementary aids and services, such as accommodations and modifications, needed to enable the child to be involved in and make progress in the general education curriculum. (Students 14, 17, 25, 31, 33, and 36)</li> </ul> <p><b>DS-14</b>  <b>34 C.F.R. § 300.320(a)(4); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.320(a)(4)</b></p> <ul style="list-style-type: none"> <li>One (1) of thirty-seven (37) student IEPs failed to identify modifications to enable the child to be involved in and make progress in the general education curriculum. (Student 33)</li> </ul> <p><b>DS-15</b>  <b>34 C.F.R. §§ 300.34, 300.320(a)(4), 300.324(b)(2); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, Rule 74.19, §§ 300.34, 300.320(a)(4), 300.324(b)(2)</b></p> <ul style="list-style-type: none"> <li>Three (3) of thirty-seven (37) student IEPs failed to identify related services that address the needs of the students and support annual goals. (Students 11, 14, and 28)</li> </ul>	<p>shall document and submit evidence of the training (e.g. sign-in sheets, PowerPoint presentations, or agendas) to the MDE/OSE for approval.</p> <ul style="list-style-type: none"> <li>Reconvene the IEP Committees for all cited students with disabilities ages 14 and older identified in the findings to develop appropriate transition plans with the required components in accordance with IDEA, the IDEA’s implementing regulations, and Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19.</li> <li>Develop or review and as necessary revise procedures to review transition plans for all students ages 14 and older to ensure the areas of noncompliance found in this report are not present in current IEPs which were not reviewed during the audit. The creation, review, revisions, and tracking system shall be documented and submitted to the MDE for approval.</li> <li>Review and revise policies and procedures for determining LRE and making educational placements for students with disabilities in accordance with the LRE placement requirements in the IDEA, the IDEA’s implementing regulations, and Miss. Admin. Code 7-3, State Board Policy Chapter 74, Rule 74.19. The review and revisions shall be documented and submitted to the MDE for approval.</li> <li>Provide training to all appropriate personnel including administrators, special education teachers, regular education teachers, speech-language therapists, and related service providers regarding LRE requirements pursuant to the IDEA, the IDEA’s implementing regulations, and Miss. Admin. Code 7-</li> </ul>	<p>September 28, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>DS-16</b>  <b>34 C.F.R. § 300.320(a)(7); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.320(a)(7)</b></p> <ul style="list-style-type: none"> <li>One (1) of thirty-seven (37) student IEPs failed to identify the duration or frequency of related services that address the needs of the students and support annual goals. (Student 17)</li> </ul> <p><b>DS-17</b>  <b>34 C.F.R. § 300.324(a)(3)(ii); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.324(a)(3)(ii)</b></p> <ul style="list-style-type: none"> <li>Three (3) of thirty-seven (37) student IEPs failed to include supports for personnel. (Students 12, 14, and 28)</li> </ul> <p><b>DS-19</b>  <b>34 C.F.R. § 300.320(a)(6)(i); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.320(a)(6)(i)</b></p> <ul style="list-style-type: none"> <li>Six (6) of thirty-seven (37) student IEPs indicated the district failed to provide a statement of individual appropriate accommodations that are necessary to measure the academic achievement and functional performance of the student on statewide and districtwide assessment programs. (Students 12, 14, 17, 25, 33, and 37)</li> </ul> <p><b>DS-20-1</b>  <b>34 C.F.R. §§ 300.320(b), 300.324(c); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320(b), 300.324(c)</b></p>	<p>3, State Board Policy Chapter 74, Rule 74.19. The district shall document and submit evidence of the training (e.g. sign-in sheets, PowerPoint presentations, or agendas) to the MDE for approval.</p> <ul style="list-style-type: none"> <li>Review and revise ESY policies and procedures to ensure all required components of the IDEA, the IDEA’s implementing regulations, Miss. Admin. Code 7-3, State Board Policy Chapter 74, Rule 74.19, and the State Board of Education approved standards included in the <i>Mississippi Department of Education Office of Special Education Extended School Year Handbook</i> (September 2003) are included, and the data used to determine eligibility for ESY services is available to support the decision.</li> <li>Provide training to all appropriate personnel including administrators, special education teachers, regular education teachers, speech-language therapists, and related service providers to ensure IEPs document the ESY eligibility determination and the criterion used to make the ESY eligibility determination is completed in accordance with the IDEA, the IDEA’s implementing regulations, Miss. Admin. Code 7-3, State Board Policy Chapter 74, Rule 74.19, and the State Board of Education approved standards included in the <i>Mississippi Department of Education Office of Special Education Extended School Year Handbook</i> (September 2003), pp. 9-18. The district shall document and submit evidence of the training (e.g. sign-in sheets, PowerPoint presentations, or agendas) to the MDE for approval.</li> </ul>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>Two (2) of seven (7) student IEP transition services plans failed to include appropriate postsecondary goals in the areas of training, education, employment, and independent living skills. (Students 17 and 13)</li> </ul> <p><b>DS-20-2</b>  <b>34 C.F.R. §§ 300.320(b), 300.324(c); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320(b), 300.324(c)</b></p> <ul style="list-style-type: none"> <li>Two (2) of seven (7) student records indicated the District failed to update postsecondary goals annually. (Students 17 and 37)</li> </ul> <p><b>DS-20-6</b>  <b>34 C.F.R. §§ 300.320(b), 300.324(c); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.320(b), 300.324(c)</b></p> <ul style="list-style-type: none"> <li>One (1) of seven (7) transition services plans on student IEPs failed to include appropriate measurable post-secondary goals updated annually and related to the student(s) identified transition needs. (Student 37)</li> </ul> <p><b>DS-20-8</b>  <b>34 C.F.R. §§ 300.321(b)(1)-(2); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.321(b)(1)-(2)</b></p> <ul style="list-style-type: none"> <li>One (1) of seven (7) student records reviewed indicated there was no evidence in the IEPs of an outside agency being invited to participate in the IEP meetings. (Student 27)</li> </ul>	<p>Contact Gretchen Cagle, State Director of Special Education, Office of Special Education, at <a href="mailto:GCagle@mdek12.org">GCagle@mdek12.org</a> or (601) 359-3498 for technical assistance or when the district is prepared for a follow-up visit to verify compliance with Process Standard 17.4.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>DS-22</b>  <b>34 C.F.R. §§ 300.115 – 300.116; Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.115 – 300.116</b></p> <ul style="list-style-type: none"> <li>Four (4) of thirty-seven (37) student records indicated IEP Committees failed to document the consideration of placement options for students with disabilities.  (Students 15, 17, 28, and 30)</li> </ul> <p><b>DS-23</b>  <b>34 C.F.R. § 300.320(a)(5); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, § 300.320(a)(5)</b></p> <ul style="list-style-type: none"> <li>Three (3) of thirty-seven (37) student IEPs failed to include an explanation of the extent to which the students participate with non-disabled peers.  (Students 17, 25, and 33)</li> </ul> <p><b>FAPE-1</b>  <b>34 C.F.R. §§ 300.17, 300.101, 300.106(b); Miss. Admin. Code 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.17, 300.101, 300.106(b); and Mississippi Department of Education Office of Special Education Extended School Year (ESY) Handbook (September 2003), pp. 9-18</b></p> <ul style="list-style-type: none"> <li>Five (5) of thirty-seven (37) student records indicated ESY documentation failed to include one (1) or more of the following: the student(s) eligibility determination, the criterion used for the student(s) ESY eligibility determination, or documented data to support the ESY eligibility decision.  (Students 14, 26, 31, 32, and 35)</li> </ul>		

**Standard 17: The school district is compliant with State and/or Federal requirements for the following programs:**

**17.4: Special Education *Individuals with Disabilities Education Act (IDEA)* (20 U.S.C §§ 1400, *et. seq.*)**

**REGULATIONS: Education Department General Administrative Regulations (EDGAR): 2 C.F.R. §§ 200.302, 200.308(c)(i)-(ii), 200.313(d)(1), 200.318(b), 200.326, 200.400(a)-(d), 200.403 – 200.405, 200.430(i)(1)(i)-(vii); 34 C.F.R. §§ 300.37, 300.132(b), 300.138; 300.202, 300.321-300.324; Miss. Admin. 7-3: 74.19, State Board Policy Chapter 74, Rule 74.19, §§ 300.37, 300.132, 300.138, 300.202, 300.321-300.324; and *Mississippi Public School Asset Management Manual* (<http://www.osa.state.ms.us/documents/property/PublicSchMan08.pdf>)**

**SUMMARY of FINDINGS**

- The MDE conducted a district-level review of the District’s fiscal policies and procedures and the District’s implementation of IDEA fiscal requirements.

**The District is NONCOMPLIANT with Process Standard 17.4.**

FINDINGS*	CORRECTIVE ACTION	TIMELINE
<p><b>2 C.F.R. §§ 200.302(b), 200.308 – 200.309, 200.404 – 200.405</b></p> <p>The District failed to provide evidence of meeting the program intent and purposes.</p> <p>According to the <i>FY18 Expenditure Budget</i> report, the District failed to align IDEA Part B expenditures with the approved application on file at MDE.</p> <p>According to the <i>FY18 Expenditure Budget</i> report, funds were expended in the amount of \$32,097.09 from function 1105 where no funds were budgeted in the MDE-approved budget.</p> <p>According to the <i>FY18 Expenditure Budget</i> report, expenditures exceeded the MDE-approved budget for function 2300 by \$693.29.</p>	<p>The District shall require the special education director and business manager to develop written procedures that outline procedures for monitoring budgets and expenditures to mitigate discrepancies. The written monitoring procedures shall be submitted to the MDE Office of Grants Management (OGM) for approval.</p> <p>The District shall provide the MDE with expenditure budget reports that demonstrate actual expenditures are aligned with the MDE-approved budget amounts for the FY18 IDEA Federal grant award.</p>	<p>Unless otherwise noted in this section of the report, the deadline for the District to complete the corrective actions is October 31, 2018.</p> <p>September 30, 2018</p>

FINDINGS*	CORRECTIVE ACTION	TIMELINE
<p>According to the <i>FY18 Expenditure Budget</i> report, the District failed to complete an amendment in FY18 prior to expending additional funds. *</p> <p><b>C.F.R. § 200.313 (d)(1) – Equipment Mississippi Public School Asset Management Manual</b></p> <p>The MDE conducted an inventory of equipment purchased with IDEA Part B and Preschool funds and found:</p> <ol style="list-style-type: none"> <li>1. Equipment not properly labeled indicating the equipment was purchased with IDEA funds;</li> <li>2. Equipment purchased with IDEA funds was not listed on the Capital Assets Summary Report; and</li> <li>3. Capital Assets Summary Report was not available for Virgil Jones, Jr. Elementary School.</li> </ol> <p><b>2 C.F.R. § 200.430 (i) (1) (i-vii) – Compensation-personal services</b></p> <p>A review of the LEA’s time and effort documentation for FY17 and FY18 revealed:</p> <ol style="list-style-type: none"> <li>1. Semi-annual certification forms were signed prior to the end date;</li> <li>2. Blanket semi-annual certification forms had dates that did not match the period being certified; and</li> <li>3. Semi-annual certification forms did not have dates to indicate when they were signed.</li> </ol> <p><b>2 C.F.R. §§ 200.318(b) - General procurement standards; 200.326- Contract provisions</b></p>	<p>The District must provide evidence that the District has</p> <ol style="list-style-type: none"> <li>1. Marked all equipment purchased with IDEA funds in FY17 and FY18 with an IDEA tag;</li> <li>2. Provide an updated Capital Assets Summary Report accounting for all of the equipment purchased in FY17 and FY18; and</li> <li>3. Provide a Capital Assets Summary Report for Virgil Jones, Jr. Elementary School.</li> </ol> <p>The District must submit semi-annual certification forms for the first semester of SY18-19 (8/1/18-12/31/18) or after the semester ends in December 2018.</p>	<p>January 4, 2019</p>

FINDINGS*	CORRECTIVE ACTION	TIMELINE
<p>The MDE requested contractual information for personnel performing psychological, physical therapy and occupational therapy and found:</p> <ol style="list-style-type: none"> <li>1. Jean T. Davis – contract and license not provided;</li> <li>2. Rachel Wallace – license not provided; and</li> <li>3. Betty Blackmon – license not provided.</li> </ol> <p>The MDE reviewed the District’s accounts payable documentation for contracted services and found the invoices selected did not specify:</p> <ol style="list-style-type: none"> <li>1. What students received the services performed;</li> <li>2. Where the services were performed;</li> <li>3. When the services were performed; and</li> <li>4. How long the services were performed.</li> </ol> <p><b>34 C.F.R. §§ 300.132(b) – Services plan for parentally-placed private school children with disabilities; 300.138 – Equitable services provided</b></p> <p>The MDE reviewed the documentation for equitable services for SY16-17 and SY17-18 and found:</p> <ol style="list-style-type: none"> <li>1. References to Individualized Education Program (IEP) were found throughout the service plan document;</li> <li>2. Notification of Invitation to Committee meeting indicated the purpose of the meeting is for an IEP;</li> <li>3. Prior Written Notice has IEP as one of the actions for the notice; and</li> <li>4. Committee Meeting Minutes form has IEP and not Service Plans.</li> </ol>	<p>The District must submit to MDE copies of all FY18 and FY19 contracts along with valid licenses executed in accordance with the requirements described above and provide a copy of an invoice template that specifies the following:</p> <ol style="list-style-type: none"> <li>1. What services are performed;</li> <li>2. Where services are performed;</li> <li>3. When services are performed and length of time;</li> <li>4. Who performs services; and</li> <li>5. Who receives services.</li> </ol> <p>The District must submit copies of revised service plans, meeting minutes, invitation to meeting, and prior written notices removing all references to IEP.</p>	

FINDINGS*	CORRECTIVE ACTION	TIMELINE
<p><b>34 C.F.R. § 300.202 – Use of amounts</b></p> <p><b>2 C.F.R. §§ 200.403 – Factors affecting allowability of costs; 200.404 – Reasonable costs; 200.405 – Allocable costs</b></p> <p>A review of the District’s FY16 and FY17 expenditures revealed the following purchase was not considered to be an allowable, allocable, or reasonable and necessary charge to the IDEA Part B and Preschool program:</p> <p>A. Gifted Expenses:</p> <ol style="list-style-type: none"> <li>1. Purchase order number 61459 in the amount of \$100.00 for registration and travel expenses in the amount of \$414.00.</li> </ol> <p><b>2 C.F.R. § 200.430 (i) (1) (i-vii) – Compensation-personal services</b></p> <p>A review of the LEA’s Account Distribution by Fund report for the special education director revealed: The employee’s Account distribution by Fund report did not show the fund code 1120.</p>	<p>The District must reimburse the IDEA Part B and Preschool program from State and local funds for questioned costs in the amount of \$514.00. Make check payable to: Treasury Fund 3201 and send to: Office of Special Education, Attention: Michael Gibbons, P.O. Box 771, Jackson, MS 39205-0771.</p> <p>The District must submit copies of the journal entries to reflect the correct amount to paid from 1120 for the special education director.</p>	<p>September 7, 2018</p>

\*According to supporting monthly request for funds documentation, MCAPS request for funds records, and discussion with the Business Manager, funds in question were not requested from MDE because the function areas in the District’s accounting software did not align with approved MCAPS budget. MDE Grants Management Bureau Director informed the Business Manager that an amendment to align with MCAPS cannot be executed after-the-fact with a subsequent request for funds made.

**Standard 17: The school district is in compliance with state and/or federal requirements for the following programs:**

**17.5: Child Nutrition**

**17.5.1: School Wellness Policy**

**REGULATIONS Miss. Code Ann. § 37-11-7; Miss. Admin. Code 7-3: 17.1, 17.2, 17.4, 17.7, and 17.9, State Board Policy Chapter 17, Rules 17.1, 17.2, 17.4, 17.7, and 17.9, and Federal Code**

**SUMMARY of FINDINGS**

- The MDE audited documentation from all four<sup>1</sup> (4) school cafeterias, which includes all sites participating in Child Nutrition Programs (CNP), for Process Standard 17.5.
- The MDE audited all six (6) schools for Process Standard 17.5.1
- The District failed to produce documentation of food production records.
- The District improperly borrowed USDA Child Nutrition funds.
- All four (4) school cafeterias failed to comply with state and/or federal requirements for Child Nutrition.
- The District failed to produce complete and current School Wellness Policies for all schools.

**The District is NONCOMPLIANT with Process Standards 17.5 and 17.5.1**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District improperly borrowed USDA Child Nutrition Funds for non-program expenses.</p> <p>The District failed to consistently maintain production records and document whether or not schools are meeting USDA meal pattern requirements:</p> <p><b>Standard 17.5</b> All four (4) school cafeterias failed to properly maintain the production book<sup>2</sup>:</p>	<p>Pursuant to 7 CFR 210.14 (a) (Non-Profit Food Service) and 7 CFR Part 210.19 (a)(1) (Assurance of Compliance for Finances) Local Education Agencies must comply with State and Federal limitations for the use of cafeteria funds and must meet the requirements for of nonprofit school food service expenditures. If using CNP funds for other purposes, the District must follow procedures outlined in the Mississippi Department of Education’s Policy and Procedure Manual for Mississippi Child Nutrition Programs (11-20 and 11-21). This document is</p>	<p>August 31, 2018</p>

<sup>1</sup> B.F. Liddell Elementary and B.F. Liddell Middle School share a cafeteria and are considered one school in the reporting of this process standard.

<sup>2</sup> A food production record is a required daily written history of the number of each menu item planned, prepared, and served. The Required Planning and Production Record (often referred to as the “Red Book”), issued by the Office of Child Nutrition, is the official documentation source for food prepared and served.

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• Virgil Jones, Jr. Elementary School</li> <li>• B.F. Liddell Elementary/Middle School<sup>1</sup></li> <li>• Earl Nash Elementary School</li> <li>• Noxubee County High School</li> </ul> <p><b>Standard 17.5.1</b> All six (6) schools failed to have the required School Wellness Policy, or the policy is lacking current requirements.</p> <p><b><u>Virgil Jones, Jr. Elementary School</u></b> The School Wellness Policy failed to be updated to reflect current standards and requirements.</p> <p><b><u>B.F. Liddell Elementary School</u></b> The School Wellness Policy failed to be updated to reflect current standards and requirements.</p> <p><b><u>Earl Nash Elementary School</u></b> The school failed to have a School Wellness Policy.</p> <p><b><u>B.F. Liddell Middle School</u></b> The school failed to have a School Wellness Policy.</p> <p><b><u>Noxubee County High School</u></b> The school failed to have a School Wellness Policy.</p> <p><b><u>Noxubee County Career and Technical Center</u></b> The school failed to have a School Wellness Policy.</p>	<p>located at: <a href="http://www.mde.k12.ms.us/docs/healthy-schools/cnpoliciesandproceduresmanual.pdf?sfvrsn=2">http://www.mde.k12.ms.us/docs/healthy-schools/cnpoliciesandproceduresmanual.pdf?sfvrsn=2</a> The District shall immediately cease the practice of borrowing CNP funds and begin following all procedures for internal loans, including approval by the MDE Office of Child Nutrition.</p> <p>Pursuant to 7 CFR 210.10(a)(3) (production and menu records), 7 CFR 210.10(c) (meal pattern for school lunches), 7 CFR 220.8 (meal requirements for breakfast), and the United States Department of Agriculture, Food and Nutrition Service, SP 10-2012 (v.8) (<i>Questions &amp; Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”</i>), schools participating in the National School Lunch Program and School Breakfast Program must meet meal requirements (or “meal pattern”) and must document how the requirements are met for review by the state agency. Therefore, the District shall ensure that child nutrition staff prepare meals that meet the meal pattern and maintain appropriate documentation of food production. The District shall provide meal pattern and production records training to the child nutrition staff of each school and implement a monitoring procedure to prevent future violations.</p> <p>Pursuant to 7 CFR 210.31 (a) (Local Wellness Policy) and Miss. Code Ann. § 37-13-134 each school must maintain a School Wellness Policy and must include required components. Acceptable corrective action includes the adoption of School Wellness Policies for those schools without one and revision of School Wellness Policies for those plans that do not meet requirements and obtain district School Board approval</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
	<p>Contact Scott Clements, State Director, Office of Child Nutrition, at <a href="mailto:SClements@mdek12.org">SClements@mdek12.org</a> or 601.576.4990 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 17.5.</p>	

**Standard 17: The school district is compliant with state and/or federal requirements for the following programs:**

**17.6: Elementary and Secondary Education Act: Titles I, II, III, IV, V, VI, X, and any other federally funded programs and grants.**

**REGULATIONS: The *Elementary and Secondary Education Act of 1965 (ESEA)* as amended by the *Every Student Succeeds Act of 2015 (ESSA)*: §§ 1003A(d), 1112(e), 1114(b), 1116(b)-(h), 3116(c), 4205(a)(3), 4205(a)(10) [20 U.S.C. §§ 6301, *et seq.*]; Education Department General Administrative Regulations (EDGAR): 2 C.F.R. §§ 200.302(b), 200.308 – 200.309, 200.313(d), 200.317 – 200.326, 200.402 – 200.405; Miss. Code Ann. §§ 27-103-159, 31-7-1, *et. seq.* (*Purchase Law Summary (June 2016)* ([http://www.osa.ms.gov/downloads/Purchase\\_Law\\_Update.pdf](http://www.osa.ms.gov/downloads/Purchase_Law_Update.pdf))); *Mississippi Public School Asset Management Manual* (<http://www.osa.state.ms.us/documents/property/PublicSchMan08.pdf>)**

**SUMMARY of FINDINGS**

- The MDE monitored the Noxubee County School District’s *ESEA* Programs as amended by *ESSA*.
- The total questioned cost is \$125,073.14.

**The District is NONCOMPLIANT with Process Standard 17.6.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Findings are based on the analysis of data collected during the on-site evaluation, including (a) interviews conducted with District staff, (b) observations of instructional programs and staff, (c) analysis of official documentation on file in the District, (d) analysis of official reports submitted to the MDE, and (e) completed evaluation forms.</p> <p><b>Compliance Indicator A-4: The LEA/Subgrantee has an accounting system and written policy and/or procedures that includes controls to prevent the over - obligation of program funds, misstatement of unliquidated obligations, duplicate payments, or other inappropriate changes to grant programs.</b>  <b>2 C.F.R. § 200.302 – 200.303; 34 C.F.R. § 76.702</b></p> <p>The District failed to provide a policy and/or procedure that includes controls to prevent the over-obligation of program funds, misstatement of unliquidated obligations, duplicate payments, or other inappropriate changes to grant programs.</p>	<p>The District shall provide to the MDE OFP a policy and/or written procedures, along with evidence of implementation that includes:</p> <ul style="list-style-type: none"> <li>• controls to prevent the over-obligation of program funds, misstatement of unliquidated obligations, duplicate payments, or other inappropriate changes to grant programs;</li> </ul>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>Compliance Indicator A-5: The LEA/Subgrantee maintains written policy and/or procedures to periodically review its accounts to ensure that all transactions (including refunds and recoded transactions) have been accurately and properly recorded.</b>  <b>2 C.F.R. § 200.302; 34 C.F.R. § 76.702; Miss. Code Ann. §§ 37-61-19, 37-61-21</b></p> <p>The District failed to provide a policy and/or procedure to ensure that all transactions have been accurately and properly recorded.</p> <p>The District failed to ensure all transactions have been accurately and properly recorded.</p> <p>The District failed to periodically review its accounts, resulting in excess spending of budget line items.</p> <p>In accordance with Miss. Code Ann. § 37-61-19, it is the duty of School District personnel to limit the expenditure of funds to the budget expenditures that have been filed and approved by the local school board. Additionally, Miss. Code Ann. § 37-61-21 authorizes the local school board, with assistance from the Superintendent, to revise the budget at any time during the fiscal year by increasing or decreasing the estimated amounts. All budget line items that are entered into the accounting system must be monitored on a regular basis to ensure that budgeted line items are not exceeded. The District must reevaluate priorities in conjunction with the approved budget revision.</p> <p><b>Compliance Indicator A-6: The LEA/Subgrantee maintains written policy and/or procedures to ensure that the LEA’s budget and accounting record align with the approved funding application, maintaining.</b>  <b>2 C.F.R. § 200.302(5); 34 C.F.R. § 76.702</b></p> <p>The District failed to provide a policy and/or procedure to ensure that the LEA’s budget and accounting records align with the approved funding application and maintains separate accounting records for each federal grant by program year.</p>	<ul style="list-style-type: none"> <li>• periodic review of its accounts to ensure that all transactions (including refunds and recoded transactions) have been accurately and properly recorded; and,</li> <li>• proper alignment of accounting records to approved funding applications, separate accounting records for each federal grant which reflects the approved line items and amount by program year.</li> </ul> <p>The District shall reimburse the MDE for the <b>Questioned Cost to FY 17 Title I, Part A in the amount of \$29,619.17.</b> The check shall be made payable to State Treasurer Fund 3201.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to ensure the budget aligned with the approved funding application.</p> <p>Location 01/Central Office and Location 09/B.F. Liddell Elementary School showed excess budget line item spending (approximately \$29,619.17) compared to the final, approved budgeted amounts in MCAPS.</p> <p><b>Compliance Indicator B-1: The LEA has board policy and/or procedures in place to demonstrate the process for:</b></p> <ul style="list-style-type: none"> <li>• <b>ensuring that it meets the limitations on the amount of carryover funds or otherwise minimize the amount of funds it carries over into a subsequent fiscal year</b></li> <li>• <b>monitoring award balances during the fiscal year</b></li> <li>• <b>planning for carryover funds, when applicable, for the subsequent fiscal year</b></li> <li>• <b>clearly capturing the separate fiscal year funding</b></li> <li>• <b>ensuring that carryover funds are prioritized over the use of current years funds.</b></li> </ul> <p><b>2 C.F.R. §§ 200.309, 200.343(b); 34 C.F.R. §§ 76.707, 76.709</b></p> <p>The District failed to provide a policy and/or procedure indicating:</p> <ul style="list-style-type: none"> <li>• how it will ensure that it meets the limitations on the amount of carryover funds or otherwise minimize the amount of funds it carries over into a subsequent fiscal year; and,</li> <li>• a system within its accounting software that will track carryover amounts. The District provided Expenditure Budget Reports that did not display the correct carryover amounts.</li> </ul> <p>The District failed to track carryover funding separately in the accounting software, and instead attempted to manually (in an Excel spreadsheet) capture carryover. Subsequently, the June 30<sup>th</sup> Expenditure Budget Reports were incorrect and did not align with the carryover budget amounts.</p>	<p>The District shall provide to the MDE OFP a revised policy or written procedures, along with evidence of implementation, that outlines how the District will ensure it:</p> <ul style="list-style-type: none"> <li>• meets the limitations on the amount of carryover funds or otherwise minimize the amount of funds it carries over into a subsequent fiscal year,</li> <li>• ensure that carryover funds are prioritized over the use of current year funds; and,</li> <li>• accurately track carryover amounts within its accounting software.</li> </ul>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District’s policies or procedures failed to determine the allowability of costs failed to ensure the charges to the Federal awards were only allowable costs incurred during the period of performance.</p> <p>The District failed to monitor federal awards, to track spending by fiscal year in the Integrity Accounting software, and to delineate carryover funds so priority could be placed on the use of funds.</p> <p><b>Compliance Indicator C-2: The LEA/Subgrantee has policy and/or procedures for the development of a corrective action plan (CAP) for the Single Audit finding(s).</b>  <b>2 C.F.R. §§ 200.303(d), 200.331(d)(3), 200.331(f), 200.508, 200.511(a), 200.512</b></p> <p>The District failed to provide a policy and/or procedure for the development of a corrective action plan (CAP) for the Single Audit finding(s).</p>	<p>The District shall provide to the MDE OFP a policy or written procedures for the development of a Corrective Action Plan (CAP) for the Single Audit finding(s).</p>	<p>August 31, 2018</p>
<p><b>Compliance Indicator D-3: The LEA has board policy and/or procedures in place to demonstrate the evaluation of the performance of its internal controls systems, who will conduct evaluation, who will monitor compliance with internal controls requirements/effectiveness of the internal controls system, and how the results of evaluation of its internal controls will be revised or implemented.</b>  <b>2 C.F.R. § 200.303</b></p> <p>The District failed to provide a policy and/or procedure to demonstrate the evaluation of the performance of its internal controls system, who will conduct evaluation, who will monitor compliance with internal controls requirements/effectiveness of the internal controls system, and how the results of evaluation of its internal controls will be revised or implemented.</p>	<p>The District shall provide to the MDE OFP a policy or written procedures to demonstrate the evaluation of the performance of its internal controls systems, who will conduct evaluation, who will monitor compliance with internal controls requirements or effectiveness of the internal controls system, and how the results of evaluation of its internal controls will be revised or implemented.</p>	<p>August 31, 2018</p>
<p><b>Compliance Indicator E-1: LEA/Subgrantee has policy and/or procedures that it will NOT disclose personally identifiable information (PII).</b>  <b>2 C.F.R. §§ 200.79, 200.303(e), 200.333, 200.336(a); 34 C.F.R. §§ 76.730 – 76.731</b></p>	<p>The District shall provide to the MDE OFP a policy and/or written procedures relating to the obligation to protect PII. The District shall provide the MDE</p>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to provide a policy and/or procedure ensuring it does not disclose PII.</p> <p><b>Compliance Indicator E-2: LEA/Subgrantee requires staff who work with PII to receive training on practices for protecting PII to ensure the integrity and security of information.</b>  <b>2 C.F.R. §§ 200.79, 200.303(e), 200.333, 200.336(a); 34 C.F.R. §§ 76.730 – 76.731</b></p> <p>The District failed to provide documentation of requirements for staff who work with PII to receive training on practices for protecting PII to ensure the integrity and security of information.</p> <p><b>Compliance Indicator F-4: The LEA/Subgrantee has a control system to ensure adequate safeguards to prevent loss, damage or theft of the property (includes notifying local law enforcement and ensuring that a police report is filed when it is discovered equipment has been stolen).</b>  <b>2 C.F.R. §§ 200.313(3) – 200.314; Mississippi Public School Asset Management Manual, pp. 2-3</b></p> <p>The District failed to implement its procedure to prevent loss of property. Specifically, the District was unable to locate:</p> <p><b><u>B.F. Liddell Elementary School:</u></b> Questioned Cost of \$106.99</p> <ul style="list-style-type: none"> <li>• Nikon digital camera – bar code 10599, date acquired 11/02/2012, purchase amount - \$106.99.</li> </ul> <p><b><u>B.F. Liddell Middle School:</u></b> Questioned Cost total of \$199.80</p> <ul style="list-style-type: none"> <li>• 7” Kindle Fire Tablet - bar code 11347, date acquired 03/15/2016, purchase amount - \$99.90.</li> <li>• 7” Kindle Fire Tablet - bar code 11353, date acquired 03/15/2016, purchase amount - \$99.90.</li> </ul> <p><b><u>Noxubee County High School:</u></b> Questioned Cost total of \$1,981.97</p>	<p>documentation of training on practices for protecting PII to ensure the integrity and security of PII.</p> <p>The District shall review and revise its written fixed asset policy to ensure the policy is in accordance with 2 C.F.R. § 200.313(d) and the <i>Mississippi Public School Asset Management Manual</i>, and includes:</p> <ul style="list-style-type: none"> <li>• control of all equipment purchased with federal funds;</li> <li>• local law enforcement is to be notified and a police report is to be filed when it is discovered equipment has been stolen;</li> <li>• a notarized affidavit be completed for lost equipment;</li> <li>• Adequate maintenance to keep property in good condition;</li> <li>• Disposition of equipment that is obsolete or no longer needed;</li> <li>• Proper disposal of equipment ensuring the highest possible return;</li> </ul>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• Computer – bar code 7313, date acquired 03/13/2005, purchase amount - \$856.00</li> <li>• Dell Desktop Computer – bar code 7316, date acquired 03/13/2005, purchase amount - \$856.00</li> <li>• Calculator – bar code 6693, date acquired 04/21/2004, purchase amount - \$89.99</li> <li>• Calculator – bar code 6695, date acquired 04/21/2004, purchase amount - \$89.99</li> <li>• Calculator – bar code 6785, date acquired 04/21/2004, purchase amount - \$89.99.</li> </ul> <p><b><u>Noxubee County School District Central Office:</u></b> Questioned Cost of \$659.00</p> <ul style="list-style-type: none"> <li>• Desktop Computer – bar code 11014, date acquired 09/30/2014, purchase amount - \$659.00.</li> </ul> <p><b>Compliance Indicator F-5: Adequate maintenance procedures to keep the property in good condition.</b>  <b>2 C.F.R. §§ 200.313 – 200.314</b></p> <p>The District failed to provide written procedures to keep the property in good condition.</p> <p><b>Compliance Indicator F-6: The disposition of equipment that is obsolete or no longer needed for the original program from which it was purchased.</b>  <b>2 C.F.R. §§ 200.313 – 200.314</b></p> <p>The District failed to provide documentation of implementation for the disposition of equipment that is obsolete or no longer needed for the original program from which it was purchased.</p> <p><b>Compliance Indicator F-7: The LEA/Subgrantee has board policy and/or Procedures for proper disposal of equipment which includes ensuring the highest possible return if the LEA is authorized or required to sell equipment if applicable. 2 C.F.R. §§ 200.313 – 200.314</b></p>	<ul style="list-style-type: none"> <li>• Proper disposal of equipment with a fair market value of greater than \$5,000; and</li> <li>• Purchased equipment essential to and benefits the program from which it was funded.</li> </ul> <p>The revised policy shall be submitted to the MDE OFP for approval prior to submission to the District’s board.</p> <p>The District shall conduct an immediate inventory of fixed assets in accordance with the above requirements to verify the existence, location, and condition of fixed assets, and to reconcile fixed asset records. Documentation of the required inventory must be submitted to the MDE.</p> <p>The District shall locate the missing assets and provide supporting documentation within 30 days after receipt of this report or submit reimbursement cost of the assets to Title I of the Questioned Cost in the amount of \$2,947.76. The check shall be made payable to State Treasurer Fund 3201.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to provide a policy and/or procedure that address the proper disposal of equipment which includes ensuring the highest possible return if the LEA is authorized or required to sell equipment if applicable.</p> <p><b>Compliance Indicator F-8: The LEA/Subgrantee has board policy and/or procedures for proper disposal of equipment that addresses the disposal of equipment with a fair market value of &gt;\$5,000. 2 C.F.R. §§ 200.313 – 200.314</b></p> <p>The District failed to provide a policy and/or procedure that includes the proper disposal of equipment that addresses the disposal of equipment with fair market value of &gt;5,000.</p> <p><b>Compliance Indicator F-9: The LEA/Subgrantee has board policy and/or procedures that ensure that any equipment was essential to and purchased for the benefit of the program from which it was funded. 2 C.F.R. §§ 200.313-200.314</b></p> <p>The District failed to provide a policy and/or procedure that ensures that any equipment was essential to and purchased for the benefit of the program from which it was funded.</p> <p><b>Compliance Indicator G-1: The LEA/Subgrantee has board policy and/or procedures in place to demonstrate:</b></p> <ul style="list-style-type: none"> <li>• <b>that specific officials are designated to approve employee time and effort documentation and charges that have firsthand knowledge of work performed</b></li> <li>• <b>the internal process to evaluate the accuracy and reliability of its time and effort system</b></li> <li>• <b>where employees are funded 100% with a single federal award, the LEA has on file certifications that the employees worked solely on that program for the period covered by the certification. Certificates are completed at least twice a year</b></li> <li>• <b>employees who work on multiple activities funded from different sources have personnel activity record that support the distribution of their salaries/wages.</b></li> </ul>	<p>The District shall provide to the MDE OFP a revised policy or written procedures that include the internal process to evaluate the accuracy and reliability of its time and effort system.</p> <p>The District shall also provide to the MDE OFP its procedures to ensure that MSIS personnel data is reported accurately and timely.</p>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>2 C.F.R. § 200.430</b></p> <p>The District provided procedures; however, the procedures did not address the internal process to evaluate the accuracy and reliability of its time and effort system. In reviewing the documentation made available to the MDE, the Mississippi Student Information System (MSIS) and the Account Distribution by Fund spreadsheet revealed inconsistencies in how employees are coded and paid. For School Year 2016-2017, MSIS listed 7 employees coded incorrectly. For School Year 2017-2018, MSIS listed 36 employees coded incorrectly.</p> <p><b>Compliance Indicator H-1: The LEA/Subgrantee has written procurement procedures which comply with federal and state regulations and ensure that the director/supervisor of each federal program documents prior approval of purchases, including full and open competition when conducting procurement transactions. 2 C.F.R. §§200.318 - 200.320; 200.322; 200.326; Appendix II to Part 200</b></p> <p>The District provided a policy and procedure; however, the District failed to provide documentation that it adheres to its procedure to ensure that the director/supervisor of each federal program documents prior approval of purchases, including full and open competition when conducting procurement transactions.</p> <p><b>Compliance Indicator H-2: The LEA/Subgrantee has board policy and/or procedures for procurement that ensures, to the greatest extent possible, avoidance of acquisition of unnecessary or duplicative items. 2 C.F.R. §§ 200.318 - 200.320; 200.322; 200.326; Appendix II to Part 200</b></p> <p>The District provided a policy; however, the District failed to provide documentation that it adheres to its policy for procurement that ensures, to the greatest extent possible, avoidance of acquisition of unnecessary or duplicative items. Compliance with this indicator needs to be confirmed via testing of subsequent procurement transactions. In reviewing sample packages, there was no indication of duplicative items.</p>	<p>Indicators H-1 thru H-9, H10: The District shall provide to the MDE OFP a developed plan for training and implementing a policy or procedures that outlines how it will:</p> <ul style="list-style-type: none"> <li>• ensure prior approval of purchases, including full and open competition when conducting procurement transactions;</li> <li>• to the greatest extent possible, avoidance of acquisition of unnecessary or duplicative items;</li> <li>• analyze the procurement process to determine the most economical approach;</li> <li>• review and/or audit the content of its procurement files to ensure completeness of its procurement records and outlines the frequency that it is performed;</li> <li>• determine that purchases with federal funds comply with federal cost principles (e.g.</li> </ul>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>Compliance Indicator H-3: The LEA/Subgrantee has board policy and/or procedures for analyzing the procurement process to determine the most economical approach. 2 C.F.R. §§ 200.318 - 200.320; 200.322; 200.326; Appendix II to Part 200</b></p> <p>The District provided a policy; however, the District failed to provide documentation of implementation of its procedure for analyzing the procurement process to determine the most economical approach. The District did provide procurement packages for Bailey Educational Group and Performance Based Educational Consultants that did not include adequate documentation to include a second quote as stated in the District’s procedures.</p> <p>The District also failed to provide documentation that it solicited quotes from vendors for services of \$3,500 or greater. The District presented procurement packages that did not include the required quotes approved by the Federal Programs Director. The District presented an Accounts Payable Report that listed payments to Bailey Education Group of \$13,774 and Performance Based Educational Consultants in the amount of \$22,355 but did not provide documentation that included second quotes for identical services. Title I Questioned Cost in the amount of \$36,129. Payments were made with FY17 Title I funds.</p> <p><b>Compliance Indicator H-4: The LEA/Subgrantee has board policy and/or procedures to review and/or audit the content of its procurement files to ensure completeness of its procurement records and outlines the frequency that it is performed. 2 C.F.R. §§ 200.318 - 200.320; 200.322; 200.326; Appendix II to Part 200</b></p> <p>The District provided a policy; however, the District failed to provide documentation detailing how it reviews and/or audits the content of its procurement files to ensure completeness of its procurement records and outlines the frequency that it is performed.</p> <p>With the assistance of the Accounts Payable staff, MDE was able to sample a few select items for review:</p>	<p>reasonable, necessary, allocable, etc.);</p> <ul style="list-style-type: none"> <li>• methods of awarding contracts;</li> <li>• monitor the work of contractors to ensure work is performed in accordance with agreement and Federal requirements; and</li> <li>• pursue appropriate action when contractors fail to perform according to the terms of agreements or otherwise fail to provide adequate goods and/or services.</li> </ul> <p>The District shall provide to the MDE OFP a revised policy and/or procedure for documentation that is maintained to establish that all procurement requirements have been met for each transaction, including:</p> <ul style="list-style-type: none"> <li>• how procurement documentation is safeguarded and stored</li> <li>• documented rationale for method of procurement</li> <li>• details pertaining to the selection or rejection</li> <li>• description of the contract type</li> <li>• basis for the contract price.</li> </ul> <p>The District shall reimburse the MDE for the Questioned Cost in the amount of \$92,506.21. The check shall be made payable to State Treasurer Fund 3201.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• Sammie Moore - Reimbursed for travel, food and lodging \$793.05</li> <li>• Beau Rivage - Lodging \$723.06</li> <li>• J. C. Penney - Homeless Student Supplies \$1,064.20</li> <li>• The Kirkland Group - Teacher Coach &amp; Professional Dev \$7,250</li> <li>• Quill Corporation - Supplies \$711.90</li> </ul> <p><b>Title I Questioned Cost in the amount of \$3,292.21. (Note: The Kirkland Group Payment of \$7,250 is not included in this questioned cost. It is a part of indicator H-6.) Payments were made with FY17 Title I funds.</b></p> <p>The District was able to provide partially completed packages for travel reimbursement, consultant fees, supplies, etc. However, numerous questions remain unanswered relative to the District’s policy and procedures that ensure that full and open competition occurs when conducting procurement transactions.</p> <p><b>Compliance Indicator H-5: The LEA/Subgrantee determines that purchases with federal funds comply with federal cost principles (e.g. reasonable, necessary, allocable, etc.). 2 C.F.R. §§ 200.318 - 200.320; 200.322; 200.326; Appendix II to Part 200</b></p> <p>The District failed to provide documentation detailing how it determines that purchases with federal funds comply with federal cost principles (e.g. reasonable, necessary, allocable, etc.). The District presented documentation of signed contracts and payments to vendors for services totaling more than the \$3,500 limit without soliciting second quotes for services.</p> <p><b>Compliance Indicator H-6: The LEA/Subgrantee has policy and/or procedures for awarding contracts that ensures the appropriate approval and contains all applicable provisions stated in the Uniform Guidance (Appendix II to Part 200). Supervisor of each federal program has internal controls for developing and awarding contracts. 2 C.F.R. §§ 200.318 - 200.320; 200.322; 200.326; Appendix II to Part 200</b></p> <p>The District provided procedures; however, the District failed to adhere to its procedures for awarding contracts. According to the Accounts Payable Report</p>		

FINDINGS						CORRECTIVE ACTION	TIMELINE																																										
<p>provided by the District, the amount of \$53,085.00 was paid to the Kirkland Group without formal bid.</p> <p>Amount paid to the Kirkland Group:</p> <table border="1"> <thead> <tr> <th>PO NO</th> <th>Date</th> <th>Amount</th> <th>Claim No</th> <th>Check No.</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>61116</td> <td>7/21/16</td> <td>\$9,225</td> <td>658619</td> <td>52739</td> <td>001</td> </tr> <tr> <td>61117</td> <td>7/21/16</td> <td>\$7,250</td> <td>657525</td> <td>52176</td> <td>001</td> </tr> <tr> <td>61223</td> <td>1/31/17</td> <td>\$24,000</td> <td>659169</td> <td>53090</td> <td>001, 008, 009, 010, 012, and 020</td> </tr> <tr> <td>61401</td> <td>9/02/16</td> <td>\$4,000</td> <td>657848</td> <td>52363</td> <td>012</td> </tr> <tr> <td>61402</td> <td>9/02/16</td> <td>\$1,360</td> <td>657849</td> <td>52363</td> <td>012</td> </tr> <tr> <td>61429</td> <td>9/08/16</td> <td>\$7,250</td> <td>659050 658618 65852</td> <td>52887 52739 52578</td> <td>001</td> </tr> </tbody> </table> <p><b>Questioned Cost - \$53,085</b></p> <p><b>Compliance Indicator H-7: The LEA/Subgrantee has policy and/or procedures to monitor the work of contractors to ensure work is performed in accordance with agreement and Federal requirements. 2 C.F.R. §§ 200.318 - 200.320; 200.322; 200.326; Appendix II to Part 200</b></p> <p>The District failed to provide a policy and/or procedure to monitor the work of contractors to ensure work is performed in accordance with agreement and Federal requirements.</p> <p><b>Compliance Indicator H-8: The LEA/Subgrantee has policy and/or procedures to follow where contractors fail to perform according to the terms of agreements or otherwise fail to provide adequate goods and/or services. 2 C.F.R. §§ 200.318 - 200.320; 200.322; 200.326; Appendix II to Part 200</b></p> <p>The District provided a policy; however, the policy did include procedures to follow when contractors fail to perform according to the terms of agreements or otherwise fail to provide adequate goods and/or services.</p>						PO NO	Date	Amount	Claim No	Check No.	Location	61116	7/21/16	\$9,225	658619	52739	001	61117	7/21/16	\$7,250	657525	52176	001	61223	1/31/17	\$24,000	659169	53090	001, 008, 009, 010, 012, and 020	61401	9/02/16	\$4,000	657848	52363	012	61402	9/02/16	\$1,360	657849	52363	012	61429	9/08/16	\$7,250	659050 658618 65852	52887 52739 52578	001		
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FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>Compliance Indicator H-10: The LEA/Subgrantee has policy and/or procedures for documentation that is maintained to establish that all procurement requirements have been met for each transaction, including:</b></p> <ul style="list-style-type: none"> <li>• how procurement documentation is safeguarded and stored</li> <li>• documented rationale for method of procurement</li> <li>• details pertaining to the selection or rejection</li> <li>• description of the contract type</li> <li>• basis for the contract price.</li> </ul> <p><b>2 C.F.R. §§ 200.318 - 200.320; 200.322; 200.326; Appendix II to Part 200</b></p> <p>The District provided a policy; however, the policy did include procedures for documentation that is maintained to establish that all procurement requirements have been met for each transaction, including how procurement documentation is safeguarded and stored, documented rational for method of procurement, details pertaining to the selection or rejection, description of the contract type, and basis for the contract price.</p> <p><b>Compliance Indicator I-2: The LEA/Subgrantee has procedures in place that are taken when it identifies excess indirect cost charges. 2 C.F.R. § 200.414, 34 C.F.R. §§76.560 – 76.569</b></p> <p>The District failed to provide a policy and/or procedure that is used when it identifies excess indirect cost charges. During the on-site interview, the Business Manager confirmed that the District does not have a written policy and/or procedure for identifying excess indirect cost.</p> <p><b>Compliance Indicator J-6: The LEA/Subgrantee has board policy and/or procedures that evaluate the relative value received from different types of expenditures made using program funds. 2 C.F.R. §§ 200.403-408; 200.420-475; EDGAR §80.30(c)(2)</b></p> <p>The District failed to provide a policy and/or procedure that evaluate the relative value received from different types of expenditures made using program funds.</p>	<p>The District shall provide to the MDE OFP policy and/or procedure that is used when it identifies excess indirect cost charges.</p> <p>The District shall provide to the MDE OFP a policy and/or procedure that both evaluates the relative value received from different types of expenditures and</p>	<p>August 31, 2018</p> <p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>Compliance Indicator J-7: The LEA/Subgrantee has board policy and/or procedures that provides a process for factoring the sustainability of the program activities into decisions regarding the use of the program funds. 2 C.F.R. §§ 200.403-408; 200.420-475; EDGAR §80.30(c)(2)</b></p> <p>The District failed to provide a policy and/or procedure that provides a process for factoring the sustainability of the program activities into decisions regarding the use of the program funds.</p> <p><b>Compliance Indicator L-1: The LEA has board policy and/or procedures in place to demonstrate:</b></p> <ul style="list-style-type: none"> <li>• the calculation of MOE</li> <li>• process if it fails to meet the MOE requirements</li> <li>• the monitoring process used during the fiscal year to ensure it meets the MOE requirements for expenditures levels.</li> </ul> <p>The District failed to provide a policy and/or procedure to demonstrate the calculation of MOE, process if it fails to meet the MOE requirements, and the monitoring process used during the fiscal year to ensure it meets the MOE requirements for expenditures levels. In reviewing documentation made available to the MDE, the District failed to provide any process documentation to ensure that it met MOE requirements for expenditure levels. Compliance with this indicator needs to be substantiated through testing using the current expenditure levels. The frequency of testing to ensure compliance will be a district-level decision.</p> <p><b>Compliance Indicator M-2: The LEA has a board policy and/or procedure in place to monitor comparability throughout the school year. §1118</b></p> <p>The District failed to provide a policy and/or procedure that monitors comparability throughout the school year.</p>	<p>the sustainability of the program activities into decisions regarding the use of program funds.</p> <p>The District shall provide to the MDE OFP a policy and/or procedure to demonstrate:</p> <ul style="list-style-type: none"> <li>• the calculation of MOE</li> <li>• process if it fails to meet the MOE requirements</li> <li>• the monitoring process used during the fiscal year to ensure it meets the MOE requirements for expenditures levels.</li> </ul> <p>The District shall also provide to the MDE OFP evidence of implementation of its process of ensuring that it met MOE requirements for expenditure levels.</p>	<p>August 31, 2018</p> <p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>Compliance Indicator N-1: The LEA/Subgrantee has board policy and/or procedures for timely and meaningful consultation with private school officials that included discussion of the following as applicable:</b></p> <ul style="list-style-type: none"> <li>• Identification of eligible students</li> <li>• Services to be provided to student</li> <li>• How, where, and by whom will services be performed</li> <li>• How will services be academically evaluated for effectiveness</li> <li>• Size and scope of services that will be provided</li> <li>• Data source to be used to determine effectiveness</li> <li>• How and when decision about delivery of services will be made (third party contractor)</li> <li>• Complaint process</li> <li>• Parent and family engagement</li> <li>• Professional development activities for school officials and staff.</li> </ul> <p><b>§1117, §8501, 34 C.F.R. §76.661, 2 C.F.R. §§ 200.62 – 200.67</b></p> <p>The District failed to provide a policy/procedure for timely and meaningful consultation with private school officials that includes all required applicable components. Although the District indicated that it complies with all the requirements of meaningful consultation with private school, it did not have written policy or procedure.</p> <p><b>Compliance Indicator P-2: Funds are drawn down from MCAPS or requested regularly in correlation to expenditures.</b></p> <p>The monthly requests for funds are being made on a regular basis. However, because some of the budget line items are overspent in Title I at some locations, the requests may not reflect allowable costs. Significant amounts are charged to the program which are not within the current budget.</p> <p><b>Compliance Indicator P-3: Funds are being requested and reported as expended monthly to satisfy the intent of each federal program.</b></p>	<p>The District shall provide to the MDE OFP a policy and/or procedure that outlines how it will monitor comparability throughout the school year.</p> <p>The District shall provide to the MDE OFP a written policy and/or procedure for timely and meaningful consultation with private school officials that include discussion of the following as applicable:</p> <ul style="list-style-type: none"> <li>• Identification of eligible students</li> <li>• Services to be provided to students</li> <li>• How, where, and by whom will services be performed</li> <li>• How will services be academically evaluated for effectiveness</li> <li>• Size and scope of services that will be provided</li> <li>• Data source to be used to determine effectiveness</li> <li>• How and when decision about delivery of services will be made (third party contractor)</li> <li>• Complaint process</li> <li>• Parent and family engagement</li> <li>• Professional development activities for school officials and staff.</li> </ul> <p>Indicators P-2 and P-3: The District shall align and monitor their budgets to ensure</p>	<p>August 31, 2018</p> <p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The monthly requests for funds are being made on a regular basis. However, because some of the budget line items are overspent in Title I at some locations, the requests may not reflect allowable costs. Significant amounts are charged to the program which are not within the current budget.</p>	<p>that requested funds from MCAPS are correlated to expenditures, as approved in the most recent budget adjustment.</p> <p>The District shall submit to the MDE OFP evidence of their aligned budgets.</p>	

**Standard 17: The school district is in compliance with state and/or federal requirements for the following programs:**

**17.7: Driver Education**

**REGULATIONS: Miss. Code Ann. § 37-25-1, et seq., and Miss. Admin. Code 7-3: 29.1, State Board Policy Chapter 29, Rule 29.1**

**SUMMARY of FINDINGS**

- The Noxubee County School District is in compliance with state and/or federal requirements for Driver Education.

**The District is COMPLIANT with Process Standard 17.7.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
None	N/A	N/A

**Standard 17: The school district is in compliance with state and/or federal requirements for the following programs:**

**17.8: Gifted Education**

**REGULATIONS:** Miss. Code Ann. §§ 37-23-171 through 181, Miss. Admin. Code 7- 3: 35.1, State Board Policy Chapter 35, Rule 35.1, and *Regulations for Gifted Education Programs in Mississippi and the Gifted Education Program Standards*

**SUMMARY of FINDINGS**

- The District has one (1) gifted classroom at a central site within the District. The MDE monitored at this site.

**The District is NONCOMPLIANT with Process Standard 17.8.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to provide policies for adapting and adding to the nature and operations of the general education program necessary for gifted education.</p> <p>The District failed to provide provisions in policy for identifying underachievers and students who might be at a disadvantage for IQ testing. The District failed to provide documentation that they use a matrix, and none of their student files indicated that they had used emerging potential to identify students. Therefore, the District failed to identify and serve underachieving gifted students who are potentially gifted.</p> <p>The District failed to make professional development materials pertaining to gifted education available to all staff, parents, and the community, and update materials on a regular basis.</p> <p>The District failed to give equitable consideration to all students for gifted education services.</p>	<p>In order to comply with Miss. Code Ann. §§ 37-23-171 through 181, and Miss. Admin. Code 7-3: 35.1, State Board Policy Chapter 35, Rule 35.1, the District shall:</p> <ul style="list-style-type: none"> <li>• update all policies regarding gifted education as prescribed by the <i>Regulations for Gifted Education Programs 2013</i>;</li> <li>• update all policies regarding potentially gifted students who may be disadvantaged for gifted identification as prescribed by the <i>Regulations for Gifted Education Programs 2013</i>;</li> <li>• provide documentation of professional development materials pertaining to gifted education that are available for checkout to all staff, parents, and the community, including plans for future acquisitions;</li> <li>• include all students in the initial pool of potentially gifted students;</li> <li>• screen all students for potential gifted identification annually at one grade for gifted education services;</li> <li>• accept referrals for the gifted education program from anyone who believes the student might be eligible for</li> </ul>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to provide documentation for universal screening of all students at one grade level for 2016 or 2017.</p> <p>The District failed to accept referrals for gifted screening from multiple sources.</p> <p>The District failed to include a hearing policy for parent appeals in district gifted education program.</p>	<p>gifted program services; and</p> <ul style="list-style-type: none"> <li>establish a policy for parent appeals.</li> </ul> <p>Contact Jen Cornett, Gifted Education Specialist, Office of Elementary Education and Reading, at <a href="mailto:JCornett@mdek12.org">JCornett@mdek12.org</a> or 601.359.2586 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 17.8.</p>	

**Standard 18: Each school has a library media center. Refer to the current edition of the *Mississippi School Library Media Guide*.**

**18.1: Each school has a library media center with an organized collection of materials and equipment that represents a broad range of current learning media, including instructional technology.**

**18.2: The library staff offers a systematic program of service to students and staff by providing access to the materials and equipment, by providing instruction in the use of the materials and equipment, and by working with teachers and other staff members to provide learning activities for the students.**

**REGULATIONS: Miss. Code Ann. §§ 37-17-6(3)(a) through (e) and *Mississippi School Library Media Guide***

**SUMMARY of FINDINGS**

- The MDE monitored four schools: two (2) elementary schools<sup>1</sup>, one (1) middle school, and one (1) high school.
- The overall collection of each library did not represent a well-balanced, broad range of current learning media, including updated instructional technology, periodicals, teacher resources, and equipment.

**The District is NONCOMPLIANT with Process Standards 18, 18.1, and 18.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>According to cataloging records, two (2) elementary schools, one (1) middle school, and one (1) high school do not offer completely automated library collections, which hinders users in finding resources located in the school library. Incomplete records do not reflect the school library collection’s value in the following schools:</p> <ul style="list-style-type: none"> <li>• Virgil J. Jones, Jr. Elementary School</li> <li>• Earl Nash Elementary School</li> <li>• B.F. Liddell Middle School*</li> <li>• Noxubee County High School</li> </ul>	<ul style="list-style-type: none"> <li>• The librarian shall review and ensure compliance with Section 4.7 Cataloging and Processing in the current <i>Mississippi School Library Media Guide</i>.</li> <li>• All library collections shall be cataloged in the automated system, including fiction, non-fiction, easy, reference, professional collection, and non-print items, including CDs/DVDs, and eBooks. The school library shall barcode and place correct spine labels on the physical item and add all record information in the automated system.</li> <li>• Library records for all materials and items shall be current and valid in order to verify the number and/or age of various collections. Library records for all materials and</li> </ul>	<p>August 1, 2019</p>

<sup>1</sup> The library located at B.F. Liddell Middle School is also utilized by B.F. Liddell Elementary School.

The following schools failed to train teachers and students on how to use the automated library system:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to cataloging records, all four schools failed to account for multiple copies of a single title in the collection when present. Classroom materials, reference collections, and professional collections are incorrectly accounted for in the library collection in the following schools:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to cataloging records, all four schools failed to provide quality general collections. The average copyright age of the general collection of materials does not meet the minimum age requirement of 10 years. The collection does not represent a well-balanced, broad range of current learning media, including updated instructional technology, periodicals, teacher resources, and equipment. This is applicable at the following schools:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

items shall match the Dewey Decimal call number and barcode found in the library facility.

- The school librarian shall count only five (5) copies of one (1) title in the system. Sets of reference materials, chapter books, professional development, and resource kits shall be organized and barcoded accordingly so that the sets/kits are accounted for but do not skew the circulation or collection analysis reports.
- Each librarian shall use Dewey Decimal call numbers in cataloging materials. Special collections such as professional, reference, easy, picture books, and/or audio/visual shall have consistent Dewey Decimal call numbers throughout the system. Cataloging and processing guidelines are located on the MDE school library website.  
[www.mde.k12.ms.us/docs/elementary-education-and-reading-library/catalogingandprocessingpractices-\(1\).pdf?sfvrsn=2](http://www.mde.k12.ms.us/docs/elementary-education-and-reading-library/catalogingandprocessingpractices-(1).pdf?sfvrsn=2)
- The school librarian shall provide training to students and faculty on how to use the automated system and how to locate resources in the library.
- The librarians and principals shall review and ensure compliance with Section 4.2 Selection Tools, Section 4.4 Collection Guidelines, and Section 4.5 Weeding in the current *Mississippi School Library Media Guide*.
- The school librarian shall develop a proposed budget addressing the general collection needs of the library center.
- To provide a balanced, diverse, and updated collection, and one that meets the needs of the learning community and the school's curriculum, each librarian shall weed aged, inaccurate, irrelevant, and worn beyond repair items. A weeding overview can be found on the MDE School Library website to aid in weeding.

[www.mde.k12.ms.us/docs/elementary-education-and-reading-library/weeding-overview-final.pdf?sfvrsn=2](http://www.mde.k12.ms.us/docs/elementary-education-and-reading-library/weeding-overview-final.pdf?sfvrsn=2)

According to cataloging records, all four schools failed to catalogue the print reference collection in the automated system which hinders users in finding resources located in the school library. The incomplete records fail to reflect the school library collection's value in the following schools:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to cataloging records, all four schools failed to have quality reference collections that support the current instructional plan as described in Section 4.4 Collection Guidelines in the current *Mississippi School Library Media Guide* and the Reference Collection Overview located on the MDE School Library website:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to cataloging records, all four schools failed to catalogue the non-print collection in the automated system, which hinders users in finding resources located in the school library. The incomplete records failed to reflect the school library collection's value in the following schools:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

- Each librarian shall conduct a formal needs assessment that includes input from teacher and/or students, an interest inventory, and instructional program needs. Assessment results and input shall guide selection of print and non-print materials and learning resources. The librarian shall use the Collection Evaluation and Collection Development Plan forms located on the MDE School Library website to develop a Collection Development Plan.  
[www.mde.k12.ms.us/ESE/LM/section-4-library-collection](http://www.mde.k12.ms.us/ESE/LM/section-4-library-collection)
- To maintain circulation records and aid users in finding titles located in the general collection, the school librarian shall barcode and place correct spine labels on the physical item and all record information in the automated system.
- The elementary school librarian shall provide resources to Kindergarten learning centers and classroom library centers in accordance to *Mississippi Pre-K Guidelines, Section IV, A2a* and *Mississippi Kindergarten Guidelines (2015), Section IV, A3a*.
- The librarian and principals shall review and ensure compliance with Section 3.6 Planning for Instruction, Section 4.4 Collection Guidelines, Section 4.5 Weeding, and Section 4.7 Cataloging and Processing in the current *Mississippi School Library Media Guide*.
- The school librarian shall develop a proposed budget addressing the reference collection needs of the library center.
- To provide a balanced, diverse, and updated reference collection, and one that meets the needs of the learning community and the school's curriculum, each librarian shall weed aged, inaccurate, irrelevant, and worn beyond repair items. The school librarian shall use the Reference Collection Overview, located on the MDE School Library website, to weed and create reference collections that connect to the College- and Career-Readiness Standards.  
[www.mde.k12.ms.us/docs/elementary-education-and-](http://www.mde.k12.ms.us/docs/elementary-education-and-)

According to cataloging records, all four schools failed to have quality non-print collections that support the current instructional plan:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to the MDE School Library Monitoring Rubric, all four schools failed to provide a separate school library website that provides access to credible, age-appropriate websites that support the curriculum and a link to the MAGNOLIA database:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to the MDE Library Monitoring Rubric, all four schools failed to train teachers and students on how to use the MAGNOLIA database and other non-print resources:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to cataloging records, all four schools failed to provide professional resources and/or provide the required professional periodicals that support the current professional development plan according to Process Standard 15 of the *Mississippi Public School Accountability Standards, 2018*:

[reading-library/21st-century-reference-collection.pdf?sfvrsn=2](#)

- The school librarians shall collaborate regularly with administrators and teachers on ways to integrate curriculum with the information literacy standards and indicators for student learning. Reference collection shall be used to meet College- and Career-Readiness English Language Arts Standards such as RI.3.5; L.4.4; and W.6.8.
- A core Reference collection shall consist of dictionaries, thesauruses, atlas, almanacs, and encyclopedias with access to MAGNOLIA.
- Each school library shall keep the most current edition of print encyclopedias and other reference materials and discard all other editions. Please review the Weeding Overview document found on the MDE School Library website: [www.mde.k12.ms.us/docs/elementary-education-and-reading-library/weeding-overview-final.pdf?sfvrsn=2](#).
- To maintain circulation records and aid users in finding titles located in the reference collection, the school librarian shall barcode and place correct spine labels on the physical item and all record information in the automated library system.
- The Librarian shall review and ensure compliance with Section 3.12 MAGNOLIA Database, Section 4.4 Collection Guidelines, Section 5.3 Digital Resources, and Section 5.6 Cataloging and Processing Digital Resources in the current *Mississippi School Library Guide*.
- The school library shall promote a curriculum-rich environment by providing balanced, up-to-date, diverse digital format materials for class-related research, individual investigation, independent reading, and personal inquiry. School librarians shall work with teachers on building the electronic resource collection, which connects to the College- and Career-Readiness standards. An

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to the school library policies and procedures handbook, all four schools failed to have long-term and short-term goals that are supported by program assessment including input from administrators, faculty, and students to assist in the process:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to the school library policies and procedures handbook, all four schools failed to have district-approved policies regarding collection development, weeding, gifts, challenged materials, and circulation:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to budget reports, all four schools failed to provide adequate funding to purchase school library materials and resources or submitting budget report or expenditure summaries to administration:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

audio/visual curriculum connection form can be found on the MDE school library website.

[www.mde.k12.ms.us/docs/elementary-education-and-reading-library/avcurriculumconnection-\(1\).pdf?sfvrsn=2](http://www.mde.k12.ms.us/docs/elementary-education-and-reading-library/avcurriculumconnection-(1).pdf?sfvrsn=2)

- The school librarian shall work with technology specialist to design a library webpage that contains library news, book reviews, unit project, recommended titles, and links to website to serve as an advocacy tool for the school library. The school website shall be linked to the school website. The school library website shall contain the librarian's name, email, and library schedule.
- The school library webpage shall contain online access to materials available in the school library, a list of credible, age-appropriate websites that support the curriculum, a link to the MAGNOLIA database, as well as other databases. MAGNOLIA and other databases shall be visibly promoted in the library.
- The school librarian shall provide training to students and faculty members on the school library website contents and MAGNOLIA database.
- To maintain circulation records and aid users in finding titles located in the non-print collection, the school librarian shall barcode and place correct spine labels on the physical item and all record information in the automated library system.
- The Librarian shall review and ensure compliance with Section 2.5 Professional Development, Section 3.12 MAGNOLIA Resources, Section 4.4 Collection Guidelines, Section 4.5 Weeding, Section 4.7 Cataloging and Processing, Section 5.3 Digital Resources, and Section 5.6 Cataloging and Processing Digital Resources in the current *Mississippi School Library Media Guide*.
- The school librarian shall develop a proposed budget addressing the professional collection needs of the library center. The school librarian shall collaborate with administrators and teachers to keep current resource

According to the school library handbook, all four schools failed to develop and utilize a school library advocacy committee that is comprised of an administrator, librarian, subject or grade level teachers, community members, and students:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to the school library handbook, all four schools failed to develop a public relations plan to promote the school library. Instead, the following schools have utilized inconsistent methods of communicating and publicizing the library:

- Virgil J. Jones, Jr. Elementary School
- Earl Nash Elementary School
- B.F. Liddell Middle School\*
- Noxubee County High School

According to facility observation, all four schools failed to provide a library climate conducive to learning and student achievement in accordance with Section 6.7 of the MS Public and Nonpublic School Library Guide.

Additional findings include:

**Virgil J Jones, Jr. Elementary School**

- The school failed to provide appropriate signage indicating various sections of the library collection.
- The school failed to provide a storytelling area for elementary students.
- The school failed to provide a neat and well-

materials for professional growth and development to meet 21st century learning needs of the staff.

- The school librarian shall collaborate with administrators and teachers to keep current resource materials for professional growth and development to meet 21st century learning needs of the staff and shall support the required professional development resources in accordance with the Process Standard 15 of the *Mississippi Public School Accountability Standards, 2018* {Miss. Code Ann. § 37-17-8} (7 Miss. Admin. Code Pt. 3, Ch. 44, R. 44.1).
- To maintain circulation records and aid users in finding titles located in the professional collection, the school librarian shall barcode and place correct spine labels on the physical item and all record information in the automated system.
- The librarians and principals shall review and ensure compliance with Section 6.8 Short- and Long-Term Goals in the current *Mississippi School Library Media Guide*.
- Goals for short- and long-range strategic plans for library improvement shall be developed. Periodic program assessments, inventories, and input from all stakeholders shall be utilized in developing the improvement goals. Goals shall be updated and addressed each year by the librarian and the administrators.
- The librarians and principals shall review and ensure compliance with Section 1.4 Intellectual Freedom, Section 1.5 Freedom to Read, Section 3.4 Using Data, Section 4.1 Understanding Collection Development, Section 4.5 Weeding of Collection Resources, Section 4.6 Challenged Materials, Section 4.7 Cataloging and Processing, and Section 6.9 Policies and Procedures Handbook in the current *Mississippi School Library Media Guide*.
- The District shall approve board policies to address selection of materials, challenges to materials, donated materials, and weeded materials.

organized library with shelving and furniture that are age-appropriate for all ages that use the library.

- The school failed to maintain organized, clutter free areas making it difficult for resources to be retrieved.
- The school failed to shelve books from left to right, read from top to bottom, and accommodate for growth.
- The school failed to organize books by the Dewey Decimal Classification System and by grade levels.

**Earl Nash Elementary School**

- The school failed to provide appropriate signage indicating various sections of the library collection.
- The school failed to provide a storytelling area for elementary students and a leisure reading area.
- The school failed to provide a neat and well-organized library with shelving and furniture that are age-appropriate for all ages that use the library.
- The school failed to maintain organized, clutter-free areas making it difficult for resources to be retrieved.
- The school failed to shelve books from left to right, read from top to bottom, and accommodate for growth.
- The school failed to organize books by the Dewey Decimal Classification System and not by reading levels.

**B.F. Liddell Middle School\***

- The school failed to provide appropriate signage indicating various sections of the library

- A library handbook of library policies and procedures shall be developed, adopted, and used in each library. The handbook shall include procedures concerning circulation, maintenance, inventory of materials, and weeding of the collection.
- The school library circulation policy shall not hinder students from open access to all the library’s resources. Students shall be able to checkout books that are related to their Lexile level and interests.
- The librarians and principals shall review and ensure compliance with Section 6.2 Budget in the current *Mississippi School Library Media Guide*.
- Each librarian shall submit an annual budget plan to the school administrator, utilizing input from all stakeholders (administrators, faculty, students, school committees).
- Each librarian shall prepare an annual budget report on expenditures by funding sources and keep records for three years. A budget template can be found on the MDE school library website.  
[www.mde.k12.ms.us/docs/elementary-education-and-reading-library/fillable-budget-report-\(3\)F9A501E38E04.pdf?sfvrsn=2](http://www.mde.k12.ms.us/docs/elementary-education-and-reading-library/fillable-budget-report-(3)F9A501E38E04.pdf?sfvrsn=2)
- The District shall provide consistent, sustained library funding to provide current books, reference materials, magazines, periodicals, newspapers, electronic resources, equipment, other emerging technologies, reaching the goal of 10 books per student.
- The District shall provide consistent, sustained library funding to provide current resources and materials to create a library environment that is conducive to building collaborative relationships with teachers and increasing student achievement.
- The librarians and principals shall review and ensure compliance with Section 3.8 Encouraging Advocacy in the current *Mississippi School Library Media Guide*.

collection.

- The school failed to provide a leisure reading area.
- The school failed to provide a neat and well-organized library with shelving and furniture that are age-appropriate for all ages that use the library.
- The school failed to maintain organized, clutter-free areas making it difficult for resources to be retrieved.
- The school failed to shelve books from left to right, read from top to bottom, and accommodate for growth.

**Noxubee County High School**

- The school failed to provide appropriate signage indicating various sections of the library collection.
- The school failed to provide a neat and well-organized library with shelving and furniture that are age-appropriate.
- The school failed to maintain organized, clutter-free areas making it difficult for resources to be retrieved.
- The school failed to shelve books from left to right, read from top to bottom, and accommodate for growth.
- The school failed to provide a secure location for all library resources and materials.

- Each school librarian shall establish an advocacy committee for the school library program within the school and beyond. The advocacy committee shall include: library staff, principal/administrator, teachers, parents, and students (when age appropriate). Advocacy committee shall link students with learning opportunities, increase available resources, and secure community support.
- The advocacy committee shall meet regularly, or a minimum of each semester, for program planning, procedures, public relations initiatives, and collection development.
- The school librarian shall create Library Advocacy Committee meeting schedules, goals and objectives, and meeting agendas. A basic agenda template can be found <http://www.mde.k12.ms.us/docs/elementary-education-and-reading-library/library-advocacy-agenda-fillable.pdf?sfvrsn=2>.
- The school librarian shall reference the American Association of School Librarians (AASL), which provides advocacy tools for school library programs at [www.aasl.org](http://www.aasl.org).
- The librarians and principals shall review and ensure compliance with Section 3.8 Encouraging Advocacy in the current *Mississippi School Library Media Guide*.
- The school's Library Advocacy Committee shall develop a Public Relations Plan to communicate regularly with all stakeholders regarding library programs and resources through print newsletters, library website, social media, displays, and public announcements. A basic Public Relations Plan template can be found at [http://www.mde.k12.ms.us/docs/elementary-education-and-reading-library/librarypublicrelationsoverview\(1\).pdf?sfvrsn=2](http://www.mde.k12.ms.us/docs/elementary-education-and-reading-library/librarypublicrelationsoverview(1).pdf?sfvrsn=2).
- The school librarian shall work with district or school public relations contact person to send library information to local news outlets and post to the district's website.

- The librarians and principals shall review and ensure compliance with Section 6.7 School Library Facilities Recommendations in the current *Mississippi School Library Media Guide*.
- The school library shall be arranged for a variety of uses by large groups, small groups, and individuals as well as leisure reading. Library furniture shall be age appropriate in each school library.
- Books and materials shall be shelved appropriately so that they are physically accessible by age level. Books shall be shelved from left to right and from top to bottom on the library shelves.
- Provide an inviting environment for students and staff with appropriately shelved and labeled resources. Quality signage shall be provided to label various sections of the library's materials and resources.
- Storage, teacher resource areas, and office spaces shall be provided and kept organized, uncluttered, resources shall be easily accessible for staff. Additional storage space shall be provided near the library for working equipment to be stored out of sight if needed.
- The school library shall be arranged to provide equitable access to information and resources within the school, community, and global networks.

Contact Elizabeth Simmons, Library Media Specialist, Office of Elementary Education and Reading, at [ESimmons@mdek12.org](mailto:ESimmons@mdek12.org) or 601.359.2586 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 18.



**Standard 19: The school district is in compliance with state law and State Board of Education policies for state adopted textbooks.**

**19.1: Each school district provides students in each school with access to current or otherwise appropriate textbooks that are in good condition. (See glossary for definition of textbook.)**

**19.2: Each school district shall keep an active and surplus inventory for each school in the district to be completed by June 15 of each year. The district shall report the inventory in the Textbook Inventory Management System.**

**REGULATIONS. Miss. Code Ann. § 37-43-1, § 37-43-24, § 37-43-31(2), § 37-43-51, § 37-9-14(2)(b), § 37-7-301(ff), Miss. Admin. Code 7-3: 79.1 and 79.2, State Board Policy Chapter 79, Rules 79.1 and 79.2, and *Textbook Administration Handbook Rules and Regulations***

**SUMMARY of FINDINGS**

- The MDE monitored three (3) schools: one (1) elementary school, one (1) middle school, and one (1) high school: Earl Nash Elementary School, B.F. Liddell Middle School, and Noxubee County High School.
- MDE could not verify compliance in two (2) schools because of limited access to district personnel during the summer months: Virgil Jones Elementary School and B.F. Liddell Elementary School.
- The District is noncompliant in three (3) schools: Earl Nash Elementary School, B.F. Liddell Middle School, and Noxubee County High School.

**The District is NONCOMPLIANT with Process Standards 19, 19.1, and 19.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to provide accurate textbook inventories. Books listed on the active listing report for the school did not reflect the books used in the classroom(s).</p> <p>School personnel reported that they did not have access to the Textbook Inventory Management System (TIMS). The personnel listed on the TIMS reports as responsible for TIMS management for the schools no longer worked at the schools. Therefore, TIMS reports have not been updated.</p> <p>The District failed to provide students with current textbooks. Some of the textbooks listed are over 12 years</p>	<p>In accordance with Miss. Code Ann. §§ 37-43-1, 37-43-24, 37-43-31(2), 37-43-51, 37-9-14(2)(b), and 37-7-301(ff), and Miss. Admin. Code 7-3: 79.1 and 79.2, State Board Policy Chapter 79, Rule 79.1 and 79.2, the District shall provide students in each school with access to current or otherwise appropriate textbooks that are in good condition and shall keep an active and surplus inventory for each school in the District to be completed by June 15 of each year. The District shall report the inventory in the Textbook Inventory Management System (TIMS). To comply with the above laws and rules:</p>	<p>December 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>old, a violation of textbook inventory policy, as outlined in the <i>Textbook Administration Handbook Rules and Regulations</i>.</p> <p><b><u>Earl Nash Elementary School</u></b>  <b>Standard 19.1:</b></p> <ul style="list-style-type: none"> <li>• Science books presented for Grades 3 and 4 are copyright 2002.</li> <li>• The school failed to present any Social Studies books. Weekly Readers and open source materials were presented as textbooks. However, they were not listed on TIMS active listing and do not meet the definition of a textbook.</li> <li>• The principal told MDE that the textbooks being used are between 15 and 20 years old and there is not enough money budgeted to update textbooks.</li> </ul> <p><b>Standard 19.2:</b></p> <ul style="list-style-type: none"> <li>• No one currently employed with the school has access to TIMS to maintain an accurate inventory.</li> <li>• Social studies books on the active listing in TIMS are copyright 2000 or earlier.</li> <li>• The school presented “Math Ready” consumable books for Grades K-4 for mathematics but failed to list them on the active listing in TIMS.</li> <li>• The school presented “Read Ready” consumable workbooks Grades K- 4 for Reading but failed to list them on the active listing in TIMS.</li> <li>• Social studies books on the TIMS active listing are copyright 2000.</li> </ul> <p><b><u>B.F. Liddell Middle School</u></b>  <b>Standard 19:</b></p> <ul style="list-style-type: none"> <li>• The school failed to provide adequate storage/shelving space for safe textbook storage.</li> </ul>	<ul style="list-style-type: none"> <li>• The District/School shall transfer all textbooks with 2004 or older copyright date to disposal as required by the <i>Textbook Administration Handbook</i> policy.</li> <li>• The District/School shall update the Security Listing report in TIMS to accurately reflect personnel currently employed with the district that have access to TIMS as required by the <i>Textbook Administration Handbook</i> policy.</li> <li>• The District/School shall update the TIMS inventory to accurately reflect all books being used at the school as required by Process Standard 19.2.</li> <li>• The District/School shall properly document the type of access each student has to instructional materials/textbooks as required by Process Standard 19.2.</li> <li>• The District/School shall remove all textbooks that are 12 years or older from storage room as required by the <i>Textbook Administration Handbook Policy</i>.</li> <li>• The District/School shall organize storage rooms so that they are safe and accessible as required by the <i>Textbook Administration Handbook Policy</i>.</li> <li>• The District/School shall provide adequate shelving for textbook storage facilities as required by the <i>Textbook Administration Handbook Policy</i>.</li> </ul> <p>Contact Chauncey Spears, Director of Textbooks, Office of Elementary Education and Reading, at</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b>Standard 19.1:</b></p> <ul style="list-style-type: none"> <li>• Science books presented for Grades 7 and 8 are copyright 2003.</li> </ul> <p><b>Standard 19.2:</b></p> <ul style="list-style-type: none"> <li>• The school failed to list the Literature books presented for Grades 7 and 8 on the active listing in TIMS.</li> <li>• The school failed to list the Math books presented (“Curriculum Associates –Instructional Manuals”) on the active listing in TIMS.</li> <li>• The school failed to list the Social studies books presented on the active listing in TIMS.</li> <li>• No one currently employed with the school has access to TIMS to maintain an accurate inventory.</li> </ul> <p><b><u>Noxubee County High School</u></b></p> <p><b>Standard 19.1:</b></p> <ul style="list-style-type: none"> <li>• English III Books presented are copyright 1998 and are in a classroom set of 18. TIMS has an active listing 131 books.</li> <li>• Literature IV books presented are copyright 1997. The school presented 38 books, yet 137 books were listed in TIMS.</li> <li>• Biology I books presented are copyright 2001.</li> </ul> <p><b>Standard 19.2:</b></p> <ul style="list-style-type: none"> <li>• No one currently employed with the school has access to TIMS to maintain an accurate inventory.</li> <li>• The school failed to list the Algebra I book presented on the active listing in TIMS.</li> </ul>	<p><a href="mailto:CRSpears@mdek12.org">CRSpears@mdek12.org</a> or 601.984.8273 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standards 19, 19.1, and 19.2.</p>	

**Standard 20: The school district meets the following instructional management requirements:**

**20.1: The school district implements an instructional management system that has been adopted by the school board and includes, at a minimum, the competencies and objectives required in the curriculum frameworks approved by the State Board of Education that are available to all teachers in each school. (Districts Meeting the Highest Levels of Performance are exempted.)**

**20.2: The instructional management system includes a tiered instructional model in accordance with Miss. Admin. Code 7-3: 41.1, State Board Policy Chapter 41, Rule 41.1, including academic interventions, behavioral interventions, and *Literacy-Based Promotion Act* requirements.**

**REGULATIONS: Miss. Code Ann. §§ 37-3-49(2)(a-c), 37-3-49(5), and Miss. Admin. Code 7-3: 41.1, State Board Policy Chapter 41, Rule 41.1**

**SUMMARY of FINDINGS**

- The MDE reviewed Tier folders at two (2) elementary schools, one (1) middle school, and one (1) high school.
- The MDE could not gain access to the required documentation at B.F. Liddell Elementary School due to the school not being in session.
- The District provided incomplete documentation at Virgil Jones, Jr. Elementary School.

**The District is NONCOMPLIANT with Process Standards 20, 20.1 and 20.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The most current instructional management system (IMS) found was for the 2016-2017 academic year, but the District failed to produce Board minutes showing that the 2017 - 2018 instructional management system (IMS) has been approved, as mandated in the standards. The documentation provided indicated that the Board approved the last IMS in 2006.</p> <p>A third-party education contractor created lesson plan templates, which the District used in the middle school and high school. However, the lesson plans consistently failed to include the teacher names, dates, school name, and activities. Furthermore, the lesson plans failed to include the activities, assignments and assessments under</p>	<p>Pursuant to Miss. Code Ann. §§ 37-3-49(2)(a-c) and 37-3-49(5), the district school board must approve an IMS that includes the competencies and objectives required in the curriculum frameworks approved by the State Board of Education and make them available to all teachers in each school to be in compliance.</p> <p>Pursuant to Miss. Code Ann. §§ 37-3-49(2)(a-c) and 37-3-49(5), the implementation of the IMS requires that the District monitor teachers to ensure that they are instructing at all levels that meet the standards provided in the State curriculum frameworks. To ensure compliance with Process Standard 20 and 20.1, the District shall develop and implement with fidelity an IMS</p>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>the curriculum framework and sub-strands. The lesson plans failed to include any tiered intervention.</p> <p><b><u>Virgil Jones, Jr. Elementary School</u></b> The MDE could not verify compliance with Process Standard 20.1. For Process Standard 20.2, the school failed to provide the MDE with all required documentation. The principal provided folders only for students who failed the previous school year. Folders provided failed to meet minimal requirements.</p> <p><b><u>B.F. Liddell Elementary School</u></b> The MDE could not verify compliance with Process Standard 20.1. For Process Standard 20.2, the school failed to provide the MDE with required documentation. The Principal was on leave. The special education director contacted the principal to see if someone could let the MDE in the building and provide documentation or to see if someone could bring Multi-Tiered System of Support (MTSS) documentation to district office for review, with no success.</p> <p><b><u>Earl Nash Elementary School</u></b> The MDE could not verify compliance with Process Standard 20.1.</p> <p>For Process Standard 20.2:</p> <ul style="list-style-type: none"> <li>• In 10 of 59 folders, the school failed to include all required documentation on the student profile sheet.</li> <li>• In 12 of 59 folders, the school failed to maintain the high-quality teacher checklist.</li> <li>• In 17 of 59 folders, the school failed to provide parent notification documentation.</li> </ul>	<p>that meets the standards set forth by the State Board of Education</p> <p>Pursuant to Miss. Admin. Code 7-3: 41.1, State Board Policy Chapter 41, Rule 41.1, the District shall implement a tiered instructional model, including academic and behavioral interventions in a MTSS, and meeting the requirements of the Literacy Based Promotion Act. To ensure compliance with Process Standard 20.2, the District shall identify all students who need interventions and place them in a structured academic and/or behavioral intervention.</p> <p>Contact Robin Lemonis, Bureau Director, Elementary Education and Reading at <a href="mailto:RLemonis@mdek12.org">RLemonis@mdek12.org</a> or Dr. Dana Bullard, Bureau Director, Office of Secondary Education at <a href="mailto:DBullard@mdek.12.org">DBullard@mdek.12.org</a>, for technical assistance or when the district is prepared for a follow-up visit to verify compliance with Process Standards 20, 20.1, and 20.2</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<ul style="list-style-type: none"> <li>• In 10 of 59 folders, the school failed to provide evidence that the students were participating in intervention.</li> <li>• In 33 of 59 folders, the school failed to provide evidence of meetings for students who had populated the MSIS screen.</li> <li>• In 32 of 59 folders, the school failed to provide Individualized Reading Plans; seven (7) of 59 folders contained Individualized Reading Plans that lacked required components.</li> <li>• In 14 of 59 folders, the school failed to provide evidence of progress monitoring data.</li> </ul> <p><b><u>B.F. Liddell Middle School</u></b>  The school is noncompliant with Process Standard 20.1. The MDE auditors had access to the counselor’s records. The IMS is from 2016-2017 and failed to include the activities, assignments and assessments under the curriculum framework and sub-strands.</p> <p>The school is noncompliant with Process Standard 20.2 based on a lack of MTSS documentation folders.</p> <p><b><u>Noxubee County High School</u></b>  The school is noncompliant with Process Standard 20.1. Of the classrooms visited with the principal of Noxubee County High School, MDE auditors could not find lesson plans or any evidence of an IMS. Additionally, the principal could not produce the IMS.</p> <p>The school is noncompliant with Process Standard 20.2 based on information obtained in interviews and a lack of MTSS documentation folders.</p>		

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Note: Because schools were not in session and District staff were unavailable, MDE auditors could not gain access to review lesson plans in some schools or observe classroom instruction to verify compliance with Process Standard 20.1. However, the MDE auditors observed that the textbooks are outdated and not aligned to the Mississippi College- and Career-Ready Standards. (<i>See also</i> process Standard 19.)</p>		

**Standard 21: The district follows an established board policy that defines criteria for the academic promotion/progression/retention of students. Such criteria prohibit the retention of students for extracurricular purposes.**

**21.1: The school district implements a uniform grading policy.**

**21.2: A student who is enrolled in any grade higher than Grade 6 in a school district must be suspended from participation in any extracurricular or athletic activity sponsored or sanctioned by the school district after a semester in which the student’s cumulative grade point average is below 2.0 on a 4.0 scale in accordance with the Mississippi High School Activities Association (MHSAA). This portion of the standard will be jointly monitored and enforced by the State Board of Education and the MHSAA.**

**REGULATIONS: Miss. Code Ann. §§ 37-11-64, 65, and 66, and Miss. Admin. Code 7-3: 2.3, State Board Policy Chapter 2, Rule 2.3**

<b>SUMMARY of FINDINGS</b>
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- The District does not have a current, Board approved policy for the promotion, progression, and retention of students.
- Inconsistencies exist in the approved local board policies and District publications regarding the promotion, progression, and retention of students.

**The District is NONCOMPLIANT with Process Standards 21, 21.1, and 21.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District does not have current, Board approved policies for the promotion, progression, and retention of students.</p> <p>The student handbook used in the District is from the 2015-2016 school year.</p> <p>Errors and inconsistencies exist in the Board policies and student handbooks regarding the promotion, progression, and retention of students.</p>	<p>In order to comply with Miss. Code Ann. §§ 37-11-64, 65 and 66, and Miss. Admin. Code 7-3: 2.3, State Board Policy Chapter 2, Rule 2.3, the District shall review and revise local board policies and district publications, such as student handbooks, to include the promotion, progression, and retention of students.</p> <p>The District shall establish and implement a uniform grading policy as required by Miss. Code Ann. §§ 37-11-64 and 66.</p>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>MDE could not identify a Board approved policy that addressed the implementation of a uniform grading policy and process that complies with Miss. Code Ann. §§ 37-11-64 and 66 and outlined in Process Standard 21.1.</p> <p>During confidential interviews with District staff, evidence such as cumulative folders, permanent records, class rosters, attendance reports, and failure lists, indicate that the District promoted students that should have been retained.</p> <p>Compliance with Process Standard 21.2 could not be verified because the District does not have a current, Board approved grading policy.</p>	<p>The District shall develop procedures to ensure that school administrators or other employees do not change, alter, or otherwise influence grades received by students from teachers or promoted students who should be retained.</p> <p>The District shall ensure that all students participating in extracurricular activities have a cumulative grade point average of a 2.0 on a 4.0 scale.</p> <p>Contact Dr. Jo Ann Malone, Executive Director, Office of Accreditation at <a href="mailto:JMalone@mdek12.org">JMalone@mdek12.org</a> or 601.359.3764 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standards 21, 21.1, and 21.2.</p>	

**Standard 22: The school district provides access to an alternative education program that meets the program guidelines outlined in Miss. Code Ann. § 37-13-92 and the guidelines established by the State Board of Education.**

**REGULATIONS: Miss. Code Ann. § 37-13-92, Miss. Admin. Code 7-3: 7.1, State Board Policy Chapter 7, Rule 7.1, and the *Guidelines for Alternative/High School Equivalency School Programs***

**SUMMARY of FINDINGS**

- Because the Noxubee County School District was not in session for the summer, the MDE completed a desk audit on one (1) alternative education program on June 25, 2018.
- The Noxubee County School District has a local school board approved contractual agreement with the Lowndes County School District to provide educational and related services to students placed in alternative education.

**The District is NONCOMPLIANT with Process Standard 22.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The MDE conducted a desk audit and reviewed the Noxubee County School District’s student handbook. The District currently has three (3) handbooks posted to the District’s website, outlining the district’s policies and procedures. The Superintendent stated that the District uses the 2015-2016 student handbook; therefore, the information obtained for this audit is from the 2015-2016 student handbook.</p> <p>The District’s policies and procedures regarding discipline do not effectively outline the continuum of disciplinary actions that will lead to student placement in the alternative education school program.</p> <p>The district is utilizing three (3) handbooks that reference discipline. The 2016-2017 Student Code of Conduct and the Parent/Student Handbooks reference the Alternatives to Suspension Program which no longer exist within the Noxubee County School District. The 2015-2016</p>	<p>The District shall review and update the local board policies and student handbook to reflect the current policies for the alternative education program.</p> <p>The District shall provide one (1) guidance document to students and parents regarding the District’s alternative education program including the student’s right to due process as outlined in <i>Goss vs. Lopez (1975)</i>.</p> <p>The consequences for specified disciplinary infractions, containing the appropriate actionable timelines, must be clear to parents, students and staff in an effort to reduce confusion and concerns regarding the governing discipline policies.</p> <p>Contact Toni Kersh, Bureau Director, Compulsory School Attendance Enforcement, Alternative Education and High School Equivalency Program, at <a href="mailto:TKersh@mdek12.org">TKersh@mdek12.org</a> or 601.359.3178 for technical</p>	<p>August 31, 2018</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>District Handbook outlines the continuum of disciplinary infractions that result in Alternative Education placement. The handbook does not outline the due process procedures for Alternative Education Placement as outlined in Goss vs. Lopez (1975).</p>	<p>assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 22.</p>	

**Standard 23: The school district, in its discretion, may provide access to a GED Option program that meets the program guidelines outlined in Miss. Code Ann. § 37-13-92(4) and the guidelines established by the State Board of Education.**

**REGULATIONS. Miss. Code Ann. § 37-13-92(4), Miss. Admin. Code 7-3: 7.2, State Board Policy Chapter 7, Rule 7.2, and the *Guidelines for Alternative/GED School Programs***

**SUMMARY of FINDINGS**

- The Noxubee County School District does not operate a GED Option program.

This standard **is NOT APPLICABLE.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
N/A	N/A	N/A

**Standard 24: Each classroom teacher, excluding vocational teachers whose class periods exceed 50 minutes, has an unencumbered period of time during the teaching day to be used for individual or departmental planning.**

**24.1: If the school utilizes a traditional six-period or seven-period day schedule, the instructional planning time provided for secondary teachers is a minimum of 225 minutes per week, exclusive of lunch period. If the school utilizes any form of a modular/block schedule, the instructional planning time provided is a minimum of either 225 minutes per week or an average of 225 minutes per week per instructional cycle, exclusive of lunch period.**

**24.2: Instructional planning time for the elementary school teacher is no less than 150 minutes per week, exclusive of lunch period.**

**REGULATIONS: Miss. Admin. Code 7-3: 2.1, State Board Policy Chapter 2, Rule 2.1**

<b>SUMMARY of FINDINGS</b>
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- Based on the 2017-2018 MSIS Personnel Data Report, all teachers have the appropriate amount of instructional planning time.

**The District is COMPLIANT with Process Standards 24, 24.1, and 24.2.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>None.</p> <p>NOTE: During the July 2, 2018 Board meeting the superintendent made the recommendation to reduce the use of substitute teachers in the upcoming 2018-2019 school year to help minimize costs by allowing teachers to volunteer to cover classes during their planning periods. The Superintendent used the term “incentive” which created confusion and questions by the Board members. The Board did not take on the recommendation but should the District do so, the District would become noncompliant with Process Standard 24 if any classroom teacher, excluding vocational teachers whose class periods exceed 50 minutes, fails to have an unencumbered period of time</p>	N/A	N/A

<b>FINDINGS</b>	<b>CORRECTIVE ACTION</b>	<b>TIMELINE</b>
during the teaching day for individual or departmental planning.		

**Standard 25: Individual teachers (grades 9-12) are limited to three (3) course preparations per scheduling cycle or five (5) in the same subject/content area. Any request for an exception must be submitted in writing to the Commission on School Accreditation for review and action.**

**REGULATIONS: Miss. Admin. Code 7-3: 2.1, State Board Policy Chapter 2, Rule 2.1**

**SUMMARY of FINDINGS**

- Based on the 2017-2018 MSIS Personnel Data Report, individual teachers of Grades 9-12 are limited to three (3) course preparations per scheduling cycle or five (5) in the same subject/content area.

**The District is COMPLIANT with Process Standard 25.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
None	N/A	N/A

**Standard 26: The curriculum of each high school at a minimum consists of required and approved courses that generate at least 32½ Carnegie units annually. Any request for an exemption from teaching the courses listed in Appendix B must be submitted in writing to the Commission on School Accreditation for review and action.**

**REGULATIONS: Miss. Code Ann. § 37-1-3(2), Miss. Admin. Code 7-3: 28.2 and 28.3, State Board Policy Chapter 28, Rules 28.2 and 28.3, and Appendices B and C of the *Mississippi Public Schools Accountability Standards, 2018***

**SUMMARY of FINDINGS**

- The MDE monitored one (1) high schools: Noxubee County High School.

**The District is NONCOMPLIANT with Process Standard 26.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Based on the 2017-2018 Master Schedule provided by the high school counselor, the school does not offer at least one (1) Advanced Placement course in each of the four (4) core areas. The 2017-2018 MSIS report indicates the school did not offer the required Advanced Placement courses. The District failed to provide evidence of completed student course request forms or inclusion of students in the courses in the master schedule. The District is noncompliant with Process Standard 26.</p>	<p>In order to comply with Miss. Code Ann. § 37-1-3(2), 7 Miss. Admin. Code Pt. 3, Ch. 28, R. 28.2, R. 28.3, and Appendices B and C of the <i>Mississippi Public Schools Accountability Standards, 2016</i>, all high schools must offer an advanced placement course in each of the four (4) core areas or submit a justification for exemption.</p> <p>Contact Dr. Dana Bullard, Bureau Director, Office of Secondary Education, at <a href="mailto:DBullard@mdek12.org">DBullard@mdek12.org</a> or 601.359.3933 for technical assistance or when the District is prepared for a follow-up visit to verify compliance with Process Standard 26.</p>	<p>August 31, 2018</p>

**Standard 27: The curriculum of each elementary or middle school (any configuration of grades K-8) at a minimum consists of reading/language arts, mathematics, science, social studies, the arts, health education, and physical education, which may be taught by a regular classroom teacher.**

**27.1: In any configuration of grades K-8, the curriculum must include 150 minutes of activity-based instruction per week and 45 minutes of instruction in health education per week.**

**27.2: Implementation of the activity-based instruction must meet or exceed the standards as approved by the State Board of Education.**

**27.3: A regular classroom teacher may provide instruction in the arts, health education, and physical education in a self-contained classroom setting.**

**REGULATIONS: Miss. Code Ann. § 37-1-3(2) and § 37-13-134**

**SUMMARY of FINDINGS**

- Because schools are not in session and district staff unavailable, the MDE could not gain access to the required documentation.

**The MDE could not determine the District’s compliance with Process Standards 27, 27.1, 27.2, and 27.3.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>Because the schools are not in session, the MDE could not gain access to the required documentation.</p> <p>It is recommended that MDE auditors return in the Fall of 2018 to review Process Standard 27.</p>	<p>N/A</p> <p>Contact Robin Lemonis, Bureau Director, Elementary Education and Reading at <a href="mailto:rlemonis@mdek12.org">rlemonis@mdek12.org</a> for technical assistance with Process Standard 27.</p>	<p>N/A</p>

**Standard 28: Student teacher ratios do not exceed the following:**

- 28.1: Student teacher ratios do not exceed 22 to 1 in kindergarten, except in instances in which a full-time assistant teacher is in the classroom. If a full-time assistant teacher is employed, 27 may be enrolled.**
- 28.2: Student teacher ratios do not exceed 27 to 1 in classrooms serving grades 1 through 4 unless approved by the State Board of Education. (Schools Meeting the Highest Levels of Performance are exempted.)**
- 28.3: Student teacher ratios do not exceed 30 to 1 in self-contained classes serving grades 5-8. A one-year waiver may be requested for classes that do not exceed more than two (2) students beyond the allowable student teacher ratio.**
- 28.4: Student teacher ratios do not exceed 33 to 1 in departmentalized academic core classes serving grades 5-12. A one-year waiver may be requested for classes that do not exceed more than two (2) students beyond the allowable student teacher ratio.**
- 28.5 The total number of students taught by an individual teacher in academic core subjects at any time during the school year shall not exceed 150. A teacher who provides instruction through intra-district or inter-district distance learning or supervises students taking virtual courses will be exempt from the 150-student limitation. A lab facilitator or principal designee will be responsible for the assignment of grades and related activities at the receiving school. (Schools Meeting the Highest Levels of Performance are exempted.)**

**REGULATIONS:** Miss. Code Ann. § 37-151-77, Miss. Admin. Code 7-3: 19.1, State Board Policy Chapter 19, Rule 19.1, and the *Mississippi Kindergarten Guidelines*

**SUMMARY of FINDINGS**

- Based on the 2017-2018 MSIS Personnel Data Report, there were no student/teacher ratios exceptions in the Noxubee County School District.

**The District is COMPLIANT with Process Standards 28, 28.1, 28.2, 28.3, 28.4, and 28.5.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
None	N/A	N/A

**Standard 29: The school district complies with the applicable policies of the State Board of Education and state and federal laws in the operation of its transportation program. The school district implements Nathan’s Law as a priority for promoting school bus safety.**

**29.1: All buses are inspected on a quarterly basis and are well-maintained and clean.**

**29.2: Each bus driver has a valid bus driver certificate and a commercial driver's license and operates the bus according to all specified safety procedures. The school district has on file a yearly motor vehicle report on each driver and evidence that each driver has received two (2) hours of in-service training per semester.**

**29.3: Bus schedules ensure arrival of all buses at their designated school sites prior to the start of the instructional day.**

**29.4: Emergency bus evacuation drills are conducted at least two (2) times each year.**

**REGULATIONS: Miss. Code Ann. § 37-41-53, § 63-1-33, § 63-1-73, § 63-3-615, and § 97-3-7, and Miss. Admin. Code 7-3: 81.3, 81.4, 81.6, 81.7, and 81.9, State Board Policy Chapter 81, Rule 81.3, 81.4, 81.6, 81.7, and 81.9.**

**SUMMARY of FINDINGS**

- The Noxubee County School District has a current inventory of 26 buses. The MDE inspected 20 buses. Six (6) buses were in the shop and were not inspected.
- Two (2) buses are restricted<sup>1</sup>.
- Because school is not in session, the MDE could not evaluate Process Standard 29.3.

**The District is NONCOMPLIANT with Process Standards 29.1, 29.2, and 29.4.**

**The MDE did not evaluate Process Standard 29.3.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The District failed to inspect all buses on a quarterly basis and ensure all buses are well-maintained and clean in accordance with Process Standard 29.1. Refer to Attachment E (Bus Fleet Inspection Report) for specific details related to noncompliance.</p> <p><b><u>Process Standard 29.1</u></b> The District failed to produce any documentation of</p>	<p>In order to comply with Miss. Code Ann. § 37-41-53, § 63-1-33, § 63-1-73, § 63-3-615, § 97-3-7, and Miss. Admin. Code 7-3: 81.3, 81.4, 81.6, 81.7, and 81.9, State Board Policy Chapter 81, Rule 81.3, 81.4, 81.6, 81.7, and 81.9, the District shall correct all noted deficiencies in Attachment E.</p> <p>The District shall inspect all buses on a quarterly basis</p>	<p>Immediately and Ongoing</p>

<sup>1</sup> Restricted buses may not be used until crossing arms and stop signs are repaired/replaced.

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>quarterly bus inspections. When asked for documentation of quarterly inspections the District presented work orders which are unacceptable forms of documentation of inspections. (See Attachment E for detailed report on fleet).</p> <p><b><u>Process Standard 29.2</u></b> The District had a yearly motor vehicle report for each bus driver on file; however, the District failed to provide documentation of the required two (2) hours of in-service training per semester for every bus driver.</p> <p><b><u>Process Standard 29.4</u></b> The District failed to produce documentation that emergency bus evacuation drills are conducted at least (2) times per year.</p>	<p>and report findings to the MDE and keep proper documentation of all inspections.</p> <p>The District shall ensure that all buses are well-maintained and clean.</p> <p>Restricted buses shall not be used to transport students.</p> <p>The District shall ensure that every school bus driver participates in a minimum of two (2) hours of in-service training per semester.</p> <p>The District shall require and ensure that bus drivers complete bus safety drills once per semester, preferably during the first week of the new school year and at the beginning of the second semester.</p> <p>The District is responsible for coordinating with the Office of Safe and Orderly Schools, Division of Pupil Transportation to correct the areas of noncompliance. Clearance of this accreditation deficiency will depend upon receipt in the Office of Accreditation of a notice from the Office of Safe and Orderly Schools, Division of Pupil Transportation stating that all noted deficiencies have been corrected and the District is in compliance with Process Standards 29, 29.1, 29.2 and 29.4.</p> <p>Contact Janice M. Shannon in the Office of Safe and Orderly Schools, Division of Pupil Transportation at <a href="mailto:jmshannon@mdek12.org">jmshannon@mdek12.org</a> or 601.359.1028 for technical assistance and/or when the District is prepared for a follow-up visit to verify compliance with Process Standards 29.1, 29.2, and 29.4.</p>	



**Standard 30: The school district provides clean and sanitary facilities in a safe and secure environment. All classrooms in each school will be air-conditioned.**

**REGULATIONS: Miss. Code Ann. § 37-7-301(c)(d)(j), §§ 37-11-5 and 49, and § 45-11-101**

**SUMMARY of FINDINGS**

- The MDE monitored six (6) schools: three (3) elementary schools, one (1) middle school, one (1) high school, and one (1) vocational school.
- The MDE found a total of 128 deficiencies on June 26, 2018.

**The District is NONCOMPLIANT with Process Standard 30.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>See enclosed Attachment F (Facility Safety Assessment) from the Office of Safe and Orderly Schools, Division of School Buildings.</p>	<p>See Attachment F for specific Corrective Actions. The District is responsible for coordinating with the Office of Safe and Orderly Schools, Division of School Buildings to correct the areas of noncompliance. Clearance of this accreditation deficiency will depend upon receipt in the Office of Accreditation of a notice from the Office of Safe and Orderly Schools, Division of School Buildings stating that all noted deficiencies have been corrected and the District is compliant with Process Standard 30.</p> <p>Contact Dennis Meador or Mark Hobson in the Office Safe and Orderly Schools, Division of School Buildings at, <a href="mailto:DMeador@mdek12.org">DMeador@mdek12.org</a>, <a href="mailto:MHobson@mdek12.org">MHobson@mdek12.org</a> or 601.359.1028, for technical assistance and/or when the District is prepared for a follow-up visit to verify compliance with Process Standard 30.</p>	<p>Immediately and Ongoing</p>

**Standard 31: The school district complies with State Board Policies and State and Federal laws to provide Safe Schools. Each school has Comprehensive School Safety Plan on file that has been approved annually by the local school board.**

**REGULATIONS: Miss. Code Ann. § 37-3-81, § 37-3-82, § 37-3-83, § 37-7-321, § 37-11-5, § 37-11-29, § 37-11-53, § 37-11-67, § 37-11-69, the Mississippi School Safety Manual, and the MDE Occupational Safety and Crisis Response Planning Manual**

**SUMMARY of FINDINGS**

- The MDE monitored six (6) schools in the District: three (3) elementary, one (1) middle, one (1) high school and one (1) Career-Technical Center.
- Comprehensive Crisis Management Plans at six (6) schools are noncompliant with Process Standard 31: Virgil Jones, Jr. Elementary School, B.F. Liddell Elementary School, Earl Nash Elementary School, B.F. Liddell Middle School, Noxubee County High School, and Noxubee County Career and Technical Center.

**The District is NONCOMPLIANT with Process Standard 31.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>The Board failed to adopt a District Comprehensive School Safety Plan for the 2017-2018 school year.</p> <p>The Board failed to adopt School Safety Plans for each school for the 2017-2018 school year.</p> <p>The District failed to provide documentation of required emergency evacuation drills.</p> <p>The District failed to provide Emergency Packs for all classrooms. During interviews, a staff member claimed that the packs are removed at the end of the year and replaced at the beginning of each school year.</p> <p>The MDE reviewed individual school Safety Plans that school staff provided however, the District failed to provide evidence that the Board ever adopted these plans.</p>	<p>In order to comply with Miss. Code Ann. § 37-11-5, the District shall conduct and document the required number of safety drills.</p> <p>The District shall adopt a Comprehensive School Safety Plan annually.</p> <p>The District shall adopt School Safety Plans for each school annually.</p> <ul style="list-style-type: none"> <li>• All plans shall include two (2) evacuation locations with maps.</li> <li>• All plans shall include two (2) Reunification locations with maps.</li> <li>• All plans shall include a Crisis Management Team listing with up to date contact information.</li> <li>• All plans shall contain provisions for the following crises at a minimum: Fire/explosion,</li> </ul>	<p>Immediately and Ongoing</p>

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p>One (1) of the plans reflected a date of 2013, one (1) reflected a date of 2015, and four (4) reflected dates for the 2016-2017 school year.</p> <p>Additional non-compliance includes:</p> <p><b><u>Virgil Jones Jr. Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The school’s Safety Plan failed to provide two (2) Evacuation locations with maps.</li> <li>• The school’s Safety Plan failed to provide two (2) Reunification points with maps.</li> <li>• The school’s Safety Plan failed to have a Crisis Management Team with contact numbers provided.</li> <li>• Safety Plan uses “codes” for emergencies rather than plain language.</li> <li>• Exterior fence gate needs to be repaired.</li> <li>• Electrical wires are in reach of the children.</li> </ul> <p><b><u>B.F. Liddell Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• The school’s Safety Plan failed to provide two (2) Evacuation locations with maps.</li> <li>• The school’s Safety Plan failed to provide two (2) Reunification points with maps.</li> <li>• The school’s Safety Plan failed to have a Crisis Management Team with contact numbers provided.</li> <li>• The school’s Safety Plan failed to address the required crises: Fire/explosion, Tornado/inclement weather, Bomb threat/Lockdown/Active Shooter, Earthquake, Internal/External hazardous materials, and threats unique to the geographical location of the school.</li> <li>• Boy’s and girl’s restroom walls contained gang graffiti.</li> </ul>	<p>Tornado/inclement weather, Bomb threat/Lockdown/Active Shooter, Earthquake, Internal/External hazardous materials, and threats unique to the geographical location of the school.</p> <ul style="list-style-type: none"> <li>• All plans shall include school blueprints.</li> </ul> <p>The District shall provide emergency packs for each classroom that contain: red, yellow, and green cards for outside evacuations, class roster with emergency student contacts, emergency procedures checklist, whistle, and list of any specific special needs of students.</p> <p>In order to comply with National Incident Management System (NIMS) guidelines, the District shall use plain language instead of color codes for emergency situations. (Replace “Code Red”, “Code Yellow”, etc. with plain language wording.)</p> <p>The District shall ensure all interior and exterior doors are capable of being secured for Lockdown situations. All doors/knobs/locks that are not functioning properly shall be repaired.</p> <p>Fences shall be repaired.</p> <p>Graffiti shall be removed.</p> <p>Ensure all electrical wiring is out of reach of children.</p> <p>The District shall work with the MDE to determine an appropriate and safe location for preschool students.</p> <p>Additional recommendations for all schools are provided in Attachment G.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b><u>Earl Nash Elementary School</u></b></p> <ul style="list-style-type: none"> <li>• Crisis Management Team and contact numbers have not been updated since 2013.</li> <li>• The school’s Safety Plan failed to address the required crises: Fire/explosion, Tornado/inclement weather, Bomb threat/Lockdown/Active Shooter, Earthquake, Internal/External hazardous materials, and threats unique to the geographical location of the school.</li> <li>• Preschool students are housed in the District administration building which is unsecured.</li> <li>• Preschool students are housed in a location that requires them to walk through traffic to access the cafeteria.</li> </ul> <p><b><u>B.F. Liddell Middle School</u></b></p> <ul style="list-style-type: none"> <li>• The school’s Safety Plan failed to provide two (2) Evacuation locations with maps.</li> <li>• The school’s Safety Plan failed to provide two (2) Reunification points with maps.</li> <li>• The school’s Safety Plan failed to have a Crisis Management Team with contact numbers provided.</li> <li>• Boy’s restroom walls contained gang graffiti.</li> </ul> <p><b><u>Noxubee County High School</u></b></p> <ul style="list-style-type: none"> <li>• The school’s Safety Plan failed to provide two (2) Evacuation locations with maps.</li> <li>• The school’s Safety Plan failed to provide two (2) Reunification points with maps.</li> <li>• The school’s Safety Plan failed to have a Crisis Management Team with contact numbers provided.</li> <li>• Boy’s and girl’s restroom walls contained gang graffiti.</li> <li>• Girl’s locker room contained vulgar graffiti.</li> </ul>	<p>The District is responsible for coordinating with the Office of Safe and Orderly Schools, Division of School Safety to correct the areas of noncompliance. Clearance of this accreditation deficiency will depend upon receipt in the Office of Accreditation of a notice from the Office of Safe and Orderly Schools, Division of School Safety stating that all noted deficiencies have been corrected and the District is compliant with Process Standard 31.</p> <p>Contact Darin Dorsey or Jennifer Skelton, Office of Safe and Orderly Schools, Division of School Safety at <a href="mailto:schoolsafety@mdek12.org">schoolsafety@mdek12.org</a> or 601-359-1028 for technical assistance and/or when the District is prepared for a follow-up visit to verify compliance with Process Standard 31.</p>	

FINDINGS	CORRECTIVE ACTION	TIMELINE
<p><b><u>Noxubee County Career and Technical Center</u></b></p> <ul style="list-style-type: none"> <li>• Interior doors are missing door knobs. Therefore, doors are not secure for Lockdowns.</li> <li>• All interior doors for the building can only be locked from the outside with a key. Therefore, it is impossible to lock down the building without opening the door.</li> <li>• The school’s Safety Plan failed to provide two (2) Evacuation locations with maps.</li> <li>• The school’s Safety Plan failed to provide two (2) Reunification points with maps.</li> <li>• The school’s Safety Plan failed to have a Crisis Management Team with contact numbers provided.</li> <li>• The school’s Safety Plan failed to address the required crises: Fire/explosion, Tornado/inclement weather, Bomb threat/Lockdown/Active Shooter, Earthquake, Internal/External hazardous materials, and threats unique to the geographical location of the school.</li> </ul> <p>See Attachment G (School Safety Audit) from the Office of Safe and Orderly Schools, Division of School Safety for additional recommendations and comments.</p>		

**Standard 32: The school district complies with state statute and State Board of Education policy for educating juveniles in youth detention centers.**

**32.1: Educational requirements**

**32.2: Financial reimbursement requirements**

**REGULATIONS: Miss. Code Ann. § 42-21-321, Miss. Admin. Code 7-3: 30.6, State Board Policy Chapter 30, Rule 30.6, and *Guidebook for Educating Juveniles in Detention Centers***

**SUMMARY of FINDINGS**

- The Noxubee County School District complies with the laws and standards governing the following Juvenile Detention Center Education Program: Lowndes County Juvenile Detention Center.

**The District is COMPLIANT with Process Standard 32.**

FINDINGS	CORRECTIVE ACTION	TIMELINE
None	N/A	N/A



Roger W. Liddell,  
Superintendent of Education

## Noxubee County School District

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*Albert Williams, Chairperson  
Yolanda Atkins, Vice Chairperson  
Betty Chandler, Board Secretary  
Narvel Coleman, Board Member  
Earl Stewart, Board Member*

**Joann Grassaree**  
Secretary

June 8, 2018

MS Department of Education  
Attn: Dr. Felicia Gavin  
P.O. Box 771  
Jackson, MS 39205

Dr. Gavin,

On behalf of the Noxubee County School District, I am requesting financial assistance for cash flow purposes from the MS Department of Education. According to MS. Code 37-17-6, the District can seek financial assistance for cash flow purposes from the Department of Education.

The Noxubee County Board of Education and I are committed to achieving and maintaining a healthy financial condition for our students and employees. I appreciate any and all assistance that your department is willing to provide.

If you need any additional information or have any questions, please contact me.

Sincerely,

Roger W. Liddell  
Superintendent of Education



**MISSISSIPPI OFFICE OF THE STATE AUDITOR**  
**STACEY E. PICKERING, AUDITOR**

PERFORMANCE AUDIT DIVISION  
DISTRICT EXIT CONFERENCE

*December 05, 2013*

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**Noxubee County School District**

Beginning on Tuesday, November 19, 2013, the Office of the State Auditor's Performance Audit Division (PAD) performed a limited review of the accuracy and reliability of student and personnel data transmitted to the Mississippi Department of Education for the purpose of determining funding for local school districts. OSA reviewed the following:

**Student Enrollment**

1. I determined whether there is a written policy on enrollment requirements and procedures at each school. As a result, I found the following:

Wilson Elementary School does have a written policy on enrollment requirements and procedures.

B F Liddell Middle School does have a written policy on enrollment requirements and procedures.

Noxubee County High School does have a written policy on enrollment requirements and procedures.

2. I determined whether the number of students enrolled in school is being accurately reported. As a result, I found the following:

Wilson Elementary School is reporting the number of students enrolled accurately.

B F Liddell Middle School is reporting the number of students enrolled accurately.

Noxubee County High School is reporting the number of students enrolled accurately.

3. I determined whether the school is following policy regarding student enrollment records. As a result, I found the following:

Wilson Elementary School is not following policy regarding student enrollment. Of the records reviewed, 12 out of 15 had missing, incomplete, or invalid proof of residency.

B F Liddell Middle School is not following policy regarding student enrollment. Of the records reviewed, 14 out of 14 had missing, incomplete, or invalid proof of residency.

Noxubee County High School is not following policy regarding student enrollment. Of the records reviewed, 27 out of 28 had missing, incomplete, or invalid proof of residency.



4. I determined whether the selected student's information is in the student package and is the same as the information kept in the student's record. As a result, I found the following:

At Wilson Elementary School, the selected student's information in the student package **is not the same** as the information kept in the student's record. Of the records reviewed, 8 out of 15 student's information **did not match** information in the student package.

At B F Liddell Middle School, the selected student's information in the student package **is not the same** as the information kept in the student's record. Of the records reviewed, 1 out of 14 student's information **did not match** information in the student package.

At Noxubee County High School, the selected student's information in the student package **is not the same** as the information kept in the student's record. Of the records reviewed, 20 out of 28 student's information **did not match** information in the student package.

**Student Attendance/Absenteeism**

1. I determined whether there is a written policy on monitoring and reporting student absences. As a result, I found the following:

Wilson Elementary School does have a written policy on monitoring and reporting student absences.

B F Liddell Middle School does have a written policy on monitoring and reporting student absences.

Noxubee County High School does have a written policy on monitoring and reporting student absences.

2. I determined whether the school is following policy regarding attendance and absenteeism. As a result, I found the following:

Wilson Elementary School is not following policy regarding attendance and absenteeism. Of excuses reviewed, 1 out of 17 did not have a valid excuse on file.

B F Liddell Middle School is following policy regarding attendance and absenteeism.

Noxubee County High School is not following policy regarding attendance and absenteeism. Of the excuses reviewed, 1 out of 21 did not contain enough information to actually validate the excused absence; and 6 out of 21 did not have a valid excuse on file.



**Graduation – THIS IS ONLY PERFORMED AT SCHOOLS WITH A 12<sup>TH</sup> GRADE**

1. I determined whether graduation requirements are being met. As a result, I found the following:

Noxubee County High School, not all students selected met graduation requirements. Of the records reviewed, 1 out of 10 did not pass or did not have documentation of being exempt from the Subject Area Tests.

2. I determine whether all graduation records were complete. As a result, I found the following:

At Noxubee County High School, all graduation records were not complete. Of the records reviewed, 7 out of 10 of students' records reviewed had incomplete Graduation Facts sections.

**School Attendance Reporting**

1. I determined whether the school is following policy regarding the reporting of unexcused absences. As a result, I found the following:

Wilson Elementary School is not following policy regarding the reporting of unexcused absences. Of the records reviewed, 1 out of 2 students reviewed was not reported in a timely manner, as specified by law, after accumulating five (5) or more unexcused absences.

B F Liddell Middle School is not following policy regarding the reporting of unexcused absences. Of the records reviewed, 1 out of 7 students reviewed was not reported to the school attendance officer after accumulating five (5) or more unexcused absences; and 3 out of 7 students reviewed were not reported in a timely manner, as specified by law, after accumulating five (5) or more unexcused absences.

Noxubee County High School is not following policy regarding the reporting of unexcused absences. Of the records reviewed, 8 out of 19 students reviewed were not reported to the school attendance officer after accumulating five (5) or more unexcused absences; and 5 out of 19 students reviewed were not reported in a timely manner, as specified by law, after accumulating five (5) or more unexcused absences.

2. I determined whether the school attendance officer is following policy regarding reporting of unexcused absences. As a result, I found the following:

Wilson Elementary School attendance officer is following policy regarding the reporting of unexcused absences.

B F Liddell Middle School attendance officer is following policy regarding the reporting of unexcused absences.

Noxubee County High School attendance officer is following policy regarding the reporting of unexcused absences.



**Reporting of Suspensions**

1. I determined whether the school is following policy regarding the reporting of suspensions. As a result, I found the following:

Wilson Elementary School is not following policy regarding the reporting of suspensions. Of the suspensions reviewed, 2 out of 5 were not reported to the school attendance officer as they occurred; 1 out of 5 suspensions was not coded as an unexcused absence, as required by law.

B F Liddell Middle School is following policy regarding the reporting of suspensions.

Noxubee County High School is not following policy regarding the reporting of suspensions. Of the suspensions reviewed, 2 out of 8 were not reported to the school attendance officer as they occurred; and 1 out of 8 suspensions was not coded as an unexcused absence, as required by law.

**Posting of Historical Documents**

1. I determined whether the school is posting the required historical documents. As a result, I found the following:

Wilson Elementary School is posting the required historical documents.

B F Liddell Middle School is posting the required historical documents.

Noxubee County High School is posting the required historical documents.

**Teacher Endorsements**

1. I determined whether teachers in the school have proper endorsements for the subjects they teach. As a result, I found the following:

At Wilson Elementary School, all the teachers reviewed have proper endorsements for the subjects they teach.

At B F Liddell Middle School, all the teachers reviewed have proper endorsements for the subjects they teach.

At Noxubee County High School, all the teachers reviewed have proper endorsements for the subjects they teach.

**Note: OSA is aware that Process Standard 8.1 allows no more than 5% of FTE units, not including academic core subjects, to work outside of the area or areas of endorsement.**



**Textbooks**

1. I determined whether each child in the school is assigned a textbook in each applicable class. As a result, I found the following:

Of the classes reviewed at Wilson Elementary School, 18 out of 20 classes did not assigned textbooks to all students enrolled.

Of the classes reviewed at B F Liddell Middle School, 20 out of 20 classes did not assigned textbooks to all students enrolled.

Of the classes reviewed at Noxubee County High School, 18 out of 20 classes did not assigned textbooks to all students enrolled.

**Note: If you are found not in compliance in this area, it is in no way OSA’s intention for you to purchase textbooks for each student in your district. OSA is simply pointing out the lack of compliance with this law as it is currently written. At this time, OSA is working diligently with the MS Legislature to amend this law in such a manner that the intent of the law is met, but there is no undue burden placed on the district/school.**

**Safety**

1. I determined whether the district/schools are in compliance with all required safety laws and policies. As a result, I found the following:

District

Noxubee County School District is in compliance with all required safety laws and policies.

Schools

Wilson Elementary School is not in compliance with all required safety laws and policies.

B F Liddell Middle School is not in compliance with all required safety laws and policies.

Noxubee County High School is in compliance with all required safety laws and policies.

**Property Internal Controls**

1. I determined whether the district has internal controls related to property and whether the district is adhering to those controls. As a result, I found the following:

Noxubee County School District has written internal controls related to property but is not adhering to those controls. 1 out of 20 items reviewed did not follow the district’s internal control procedures.



Kevin Jones, Ed. D.  
Superintendent of Education

## Noxubee County School District

*P. O. Box 540*

*Macon, Mississippi 39341*

*Phone: (662) 726-4527 or 726-4583*

*Fax: (662) 726-2809*

*[www.noxcnty.k12.ms.us](http://www.noxcnty.k12.ms.us)*

*Earl Stewart, Chairperson*  
*Albert Williams, Vice Chairperson*  
*Yolanda Welch Atkins, Board Secretary*  
*Betty Chandler, Board Member*  
*Narvel Coleman, Board Member*

*Joann Grassaree*  
*Secretary*

December 19, 2013

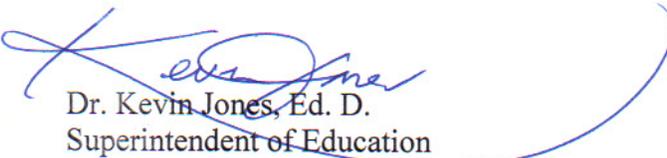
Mississippi Office of the State Auditor  
Performance Audit Division  
Earlene Stewart  
P. O. Box 11183  
Jackson, MS 39283

Dear Ms. Earlene Stewart:

Attached is the Corrective Action Plan for citations noted during the December 5, 2013 audit. For clarity district-wide pre-registration will be conducted prior to the beginning of school. Residency proofs will be collected during the pre-registration.

If additional information is needed please don't hesitate to request it.

Sincerely,



Dr. Kevin Jones, Ed. D.  
Superintendent of Education

Noxubee County School District  
Corrective Action Plan (CAP)  
State Auditor's Findings  
November 2013

WILSON ELEMENTARY SCHOOL  
CORRECTIVE ACTION PLAN (CAP)

Student Enrollment:

**3. I determined whether the school is following policy regarding student enrollment records. As a result, I found the following:**

**Wilson Elementary School is not following policy regarding student enrollment. Of the records reviewed, 12 out of 15 had missing, incomplete, or invalid proof of residency.**

Wilson Elementary will have pre-registration for all students during the summer at which time all students will present two (2) proofs of residency.

**4. I determined whether the selected student's information is in the student package and is the same as the information kept in the student's record. As a result, I found the following:**

**At Wilson Elementary School, the selected student's information in the student package is not the same as the information kept in the student's record. Of the records reviewed, 8 out of 15 student's information did not match information in the student package.**

Wilson Elementary School's secretary/counselor will ensure that the students' residency addresses and telephone numbers are kept up-to-date in the student package (SAM) and in the student's record (Cumulative Folder). As changes are being made by the secretary in SAM, an update slip will be placed in the cumulative folder for the counselor to update the student record.

Student Attendance/Absenteeism:

**2. I determined whether the school is following policy regarding attendance and absenteeism. As a result, I found the following:**

**Wilson Elementary School is not following policy regarding attendance and absenteeism. Of excuses reviewed, 1 out of 17 did not have a valid excuse on file.**

Documentation for excused absences will be reviewed for acceptance and placed on file in the school office.

**School Attendance Reporting**

**1. I determined whether the school is following policy regarding the reporting of excused absences. As a result, I found the following:**

**Wilson Elementary School is not following policy regarding the reporting of unexcused absences. Of the records, reviewed, 1 out of 2 students reviewed was not reported in a timely manner, as specified by law, after accumulating five (5) or more unexcused absences.**

Wilson Elementary School will collect daily absences on all students and report to the attendance office all student unexcused absences that are five or more each week on Tuesdays and Thursdays. Excused absences will only include: Doctor's excuses, Funerals (must produce a copy of the obituary) and Parent Excuses (a written note or letter from the parent – 3 per semester). A copy of this policy will be placed within the general section of the Noxubee County Student Handbook.

**Reporting of Suspensions**

**1. I determined whether the school is following policy regarding the reporting of suspensions. As a result, I found the following:**

**Wilson Elementary School is not following policy regarding the reporting of suspensions. Of the suspensions reviewed, 2 out of 5 were not reported to the school attendance office as they occurred; 1 out of 5 suspensions was not coded as an unexcused absence, as required by law.**

Suspensions will be reported to the attendance officer in the form of a fax and a follow-up phone call on the day that they occur. All suspensions will be tagged as unexcused in our student package (SAM) as required by law.

**Textbooks**

**1. I determined whether each child in the school is assigned a textbook in each applicable class. As a result, I found the following:**

**Of the classes reviewed at Wilson Elementary School, 18 out of 20 classes did not assign textbooks to all students enrolled.**

Due to funding, Wilson Elementary School provides classroom sets of books for each class.

**Safety**

1. **I determined whether the district/schools are in compliance with all required safety laws and policies.** As a result, I found the following:

**Wilson Elementary School is not in compliance with all required safety laws and policies.**

Wilson Elementary School will update its safety plan annually to ensure that all safety laws and policies are addressed in detail and followed.

**B.F. LIDDELL MIDDLE SCHOOL**

**CORRECTIVE PLAN ACTION**

**Student Enrollment**

1. **B. F. Liddell Middle School does have a written policy on enrollment requirements and procedures.**
2. **B. F. Liddell Middle School is reporting the number of students enrolled accurately.**

3. **B. F. Liddell Middle School is not following policy regarding student enrollment.**

Prior to the beginning of each school year, all students will receive a pre-registration package. One of the registration pieces will be proof of residency. All parents or guardians of students will be required to provide the school with 2 proofs of residency to verify residence. The proofs will be placed inside each student's permanent record.

4. **At B. F. Liddell Middle School, the selected student's information in the student package is not the same as the information kept in the student's record. Of the records reviewed, 1 out of 14 student's information did not match information in the student's package.**

Once per semester, the students will take home an information questionnaire for the parents or guardians to update addresses and phone numbers. This information will be

updated in the student package (SAM) and on the students' permanent records. As information is updated in SAM, the students' permanent records will also be updated.

### Student Attendance/Absenteeism

1. **B. F. Liddell Middle School does have a written policy on monitoring and reporting student absences.**
2. **B. F. Liddell Middle School is following policy regarding attendance and absenteeism.**

### School Attendance Reporting

1. **B. F. Liddell Middle School is not following policy regarding the reporting of unexcused absences. Of the records reviewed, 1 out of 7 students reviewed was not reported to the school attendance officer after accumulating five (5) or more unexcused absences; and 5 out of 9 students reviewed were not reported in a timely manner, as specified by law, after accumulating five (5) or more excused absences.**

The school attendance officer will be notified on school letterhead via fax on the day of all student suspensions. Also, the counselor will notify the school attendance officer on Tuesdays and Thursdays of the students who have accumulated 5 or more unexcused absences.

2. **B. F. Liddell Middle School is following policy regarding the reporting of suspensions.**

### Reporting of Suspensions

1. **B. F. Liddell Middle School is posting the required historical documents.**

### Teacher Endorsement

1. **At B. F. Liddell Middle School, all the teachers reviewed have proper endorsements for the subjects they teach.**

**Textbooks**

1. **Of the classes reviewed at B. F. Liddell Middle School, 20 out of 20 classes did not assign textbooks to all students enrolled.**

A classroom set of textbooks is provided for all teachers in all subject areas. Each student has access to a textbook during the time assigned to a particular class. Homework assignments are photocopied for each child to take home to complete.

**Safety**

1. **B.F. Liddell Middle School is not in compliance with all required safety laws and policies.**

The faculty and students will be trained on the procedures to follow during a crisis situation. Crisis drills for tornado, fire, intruder, and bomb will be conducted according to State Policy and documentation of each will be kept on file. The Crisis Management Plan will be used.

**NOXUBEE COUNTY HIGH SCHOOL**

**CORRECTIVE PLAN ACTION**

**Student Enrollment**

**Noxubee County High School is not following policy regarding student enrollment. Of the records reviewed, 27 out of 28 had missing, incomplete, or invalid proof of residency.**

3. Noxubee County High School will adhere to the Verification of Residence policy (NCSD School Board Policy JBC, JBCA) that requires parents, legal guardians, or other adults seeking to enroll students to provide documentation (two proofs of residency), which will verify that each student resides with the parent or legal guardian in the Noxubee County School District boundaries at the beginning of the current school year. This documentation will be provided on or before the initial enrollment day for Noxubee County High School students.

**At Noxubee County High School the selected student information in the student package is not the same as the information kept in the student's record. Of the records reviewed, 20 out of 28 students' information did not match information in the student package.**

4. The Noxubee County High School counselors will review student records during the first month of current school year to verify that information in the student's record is current. Upon reviewing each student's records, the counselors will ensure that the information in the student package concurs with information kept in the student's record. If the information does not match, the counselor will update the information on the student's record.

#### **Student Attendance/Absenteeism**

**Noxubee County High School is not following policy regarding attendance and absenteeism. Of the excuses reviewed, 1 out of 21 did not contain enough information to actually validate the excused absence; and 6 out of 21 did not have a valid excuse on file.**

2. Noxubee County High School will adhere to the attendance policy adopted by the Noxubee County School Board regarding excused absences: Excused absences will validating only include doctors, funeral, parent excuses (3 per semester). Documentation of such excused absences will be kept on file in the parent coordinator's office with copies in the main administrative office.

#### **Graduation**

**Noxubee County High School, not all students selected met graduation requirements. Of the records reviewed, 1 out of 10 did not pass or did not have the documentation of being exempt from the Subject Area Tests.**

1. Documentation will be obtained and placed in each student's permanent cumulative folder documenting the student's passing or being exempt from Subject Area Tests.

### Attachment C:

In accordance with the Federal Educational Rights to Privacy Act (FERPA) and the Individuals with Disabilities Education Act (IDEA), to prevent the disclosure of students' personally identifiable information, Attachment C has been provided to the Noxubee County School District, shall remain confidential, and shall not be released in ANY public records request.

## Attachment D:

Note: Attachment D has been pulled.

## Attachment E

### Noxubee County School District Bus Fleet Inspection Report

<u>Bus #</u>	<u>Year, Make, Model</u>	<u>Mileage</u>	<u>Defects</u>
07-21	2006	123,480	<ul style="list-style-type: none"><li>• Rear passenger side tire needs replacing</li><li>• Front passenger side signal light out</li><li>• Left and right-side crossover mirrors loose</li><li>• Several seats need clamping</li><li>• Graffiti on several seats</li><li>• Aisle runner needs replacing</li></ul>
54-03	2003 International	65,023	<ul style="list-style-type: none"><li>• Front driver's side tire needs replacing</li><li>• Rear passenger side tire needs replacing</li><li>• Passenger side crossover mirror loose</li><li>• Graffiti on several seats</li><li>• Passenger side emergency window buzzers not working</li><li>• Left and right reverse lights out</li><li>• Reverse buzzer not working</li><li>• Oil leak</li><li>• Entrance door rubber sealing needs replacing</li></ul>

07-20 RESTRICTED <sup>1</sup>	2006 International	210,533	<ul style="list-style-type: none"> <li>• Crossing control arm not working</li> <li>• Several seats need padding and covering</li> <li>• One (1) seat needs clamping</li> <li>• Emergency door difficult to open</li> <li>• Missing First Aid kit</li> <li>• Missing Body Fluid kit</li> <li>• Left and right reverse lights out</li> <li>• Reverse buzzer not working</li> <li>• Aisle runner needs replacing</li> <li>• Entrance door rubber sealing needs replacing</li> <li>• Damaged tail pipe</li> </ul>
52-03	2003 International	97,059	<ul style="list-style-type: none"> <li>• Front amber light out</li> <li>• Emergency window buzzers not working</li> <li>• Emergency door buzzer not working</li> <li>• Front emergency roof hatch buzzer not working</li> <li>• Missing Body Fluid kit</li> <li>• Left reverse light out</li> <li>• Entrance door rubber sealing needs replacing</li> <li>• Cracked driver side window</li> <li>• Missing tail pipe</li> <li>• Hood needs replacing</li> </ul>
31	2009 Blue Bird	122,323	<ul style="list-style-type: none"> <li>• Entrance door rubber sealing needs replacing</li> <li>• Stop sign needs replacing</li> <li>• Four (4) seats need clamping</li> <li>• Several seats need covering</li> <li>• Emergency window buzzers not working</li> <li>• Emergency door difficult to open</li> </ul>

<sup>1</sup> Restricted buses may not be used to transport students.

48	2000 Blue Bird	168,348	<ul style="list-style-type: none"> <li>• Stop sign cover needs replacing</li> <li>• Emergency window buzzers not working</li> <li>• Emergency door difficult to open</li> <li>• Emergency door buzzer not working</li> <li>• Emergency roof hatch buzzers not working</li> <li>• Missing Body Fluid kit</li> <li>• Right side lower and upper brake lights out</li> <li>• Entrance door rubber sealing needs replacing</li> </ul>
14-18	2014 International	99,201	<ul style="list-style-type: none"> <li>• Loose crossing control arm</li> <li>• Stop sign cover needs replacing</li> <li>• Amber lights not working</li> <li>• Bus interior needs cleaning</li> <li>• Several seats torn</li> <li>• Several seats need padding and covering</li> <li>• Emergency window buzzers not working</li> <li>• Emergency roof hatch buzzers not working</li> <li>• Entrance door rubber sealing needs replacing</li> </ul>
102	2017 Blue Bird	18,513	<ul style="list-style-type: none"> <li>• Emergency window buzzers not working</li> <li>• Emergency roof hatch buzzers not working</li> </ul>
20-16	2016 International	63,899	<ul style="list-style-type: none"> <li>• Cracked windshield</li> <li>• Reverse buzzer not working</li> </ul>
11-81	2011 International	97,786	<ul style="list-style-type: none"> <li>• Window buzzers not working</li> <li>• Left side crossover mirror loose</li> </ul>
103	2017 Blue Bird	59,419	<ul style="list-style-type: none"> <li>• Reverse light not working</li> <li>• Rear stop-sign light out</li> <li>• Tail light out on the right side</li> <li>• Coolant fan not working</li> </ul>
25	2004 International	168,688	<ul style="list-style-type: none"> <li>• Emergency window buzzers not working</li> <li>• Emergency door buzzer not working</li> <li>• Several seats need covering</li> <li>• Left and right crossover mirrors loose</li> </ul>

33	2006 Blue Bird	120,125	<ul style="list-style-type: none"> <li>• Reverse lights not working</li> <li>• Rear stop-sign not working</li> <li>• Windshield wiper blades need replacing</li> <li>• Several seats need covering</li> <li>• Emergency roof hatch buzzers not working</li> <li>• Missing Body Fluid kit</li> <li>• Left and right crossover mirrors loose</li> <li>• Hood latch not working</li> <li>• Right front student light-cover needs replacing</li> </ul>
82	2011 International	109,253	<ul style="list-style-type: none"> <li>• Rear stop-sign light out</li> <li>• Rear reverse light out</li> <li>• Left side window buzzers not working</li> <li>• Left and right crossover mirrors loose</li> <li>• Several seats need covering</li> </ul>
101	2017 Blue Bird	29,288	<ul style="list-style-type: none"> <li>• Left and right crossover mirrors loose</li> <li>• Left and right reverse lights not working</li> <li>• Reverse lights out</li> </ul>
26	2006 International	133,454	<ul style="list-style-type: none"> <li>• Several seats need covering</li> <li>• Missing fire extinguisher</li> <li>• Left front signal light not working</li> </ul>
17	2011 International	86,323	<ul style="list-style-type: none"> <li>• Cracked windshield</li> <li>• Emergency window buzzers not working</li> </ul>
22	2003 International	205,450	<ul style="list-style-type: none"> <li>• Stop sign lights out</li> </ul>
56-03 RESTRICTED	2003 International	145,000	<ul style="list-style-type: none"> <li>• Stop sign not working</li> <li>• Driver side front signal light cover needs replacing</li> <li>• Emergency window buzzers not working</li> <li>• Emergency door buzzer not working</li> <li>• Lower right-side tail light not working</li> <li>• Right side reverse light not working</li> <li>• Oil leak</li> </ul>

04-5	2004 International	121,834	<ul style="list-style-type: none"> <li>• Front driver side tire needs replacing</li> <li>• Passenger side crossover mirror loose</li> <li>• Cracked windshield</li> <li>• Emergency door buzzer not working</li> <li>• Missing First Aid kit</li> <li>• Missing Body Fluid kit</li> <li>• Loose hood and grill</li> </ul>
7	2003 International	85,865	<ul style="list-style-type: none"> <li>• Front and rear signal lights not working</li> <li>• Emergency window buzzers not working</li> <li>• Emergency door buzzer not working</li> <li>• Emergency roof hatch buzzers not working</li> <li>• Right side reverse light out</li> <li>• Right upper brake light out</li> </ul>
14-19	2012 International	82,566	<ul style="list-style-type: none"> <li>• Passenger rear signal light needs replacing</li> <li>• Graffiti on several seats</li> <li>• Emergency window buzzers not working</li> <li>• Expired fire extinguisher</li> <li>• Lower right-side brake light not working</li> </ul>

32	2006 Blue Bird	135,272	<ul style="list-style-type: none"> <li>• Left and right crossover mirrors loose</li> <li>• Four (4) seats need clamping</li> <li>• Graffiti on several seats</li> <li>• Two (2) emergency windows difficult to open</li> <li>• Emergency roof hatch buzzers not working</li> <li>• Emergency roof hatch vent needs adjusting</li> <li>• Missing Body Fluid kit</li> <li>• Reverse light on the left side not working</li> <li>• Speaker cover (roof of bus) needs remounting</li> <li>• Aisle runner needs to be replaced</li> <li>• Stop sign on the rear of the bus needs replacing</li> <li>• Rubber sealing on the entrance step needs replacing</li> <li>• Hole on top step on the entrance of the bus needs to be filled in</li> <li>• Damaged tail pipe</li> <li>• Cracked service door glass</li> </ul>
27	2007 International	146,033	<ul style="list-style-type: none"> <li>• Missing Body Fluid kit</li> <li>• Right lower brake light not working</li> <li>• Bus number on the hood needs to be replaced</li> </ul>
17	2014 International	86,323	<ul style="list-style-type: none"> <li>• Cracked windshield</li> <li>• Emergency window buzzers not working</li> </ul>
22	2003 International	205,450	<ul style="list-style-type: none"> <li>• Lower left brake light not working</li> </ul>

The following buses are used for spare and trip buses: 101, 102 and 103.

The following buses are in the shop for repairs:

43, 14, 12, 44, 23 and 24

The following buses are restricted (not allowed to be used to transport students):

07-20 and 56-03

## **Attachment F**

**Office of Safe and Orderly Schools  
Division of School Buildings  
Facility Safety Assessment  
Dennis Meador, School Facilities Supervisor  
Mark Hobson, School Facilities Supervisor  
June 26, 2018**

This report includes the following findings, corrective actions, and recommendations for consideration at each of the following school sites. If you need additional information regarding this report, you may contact Dennis Meador or Mark Hobson at 601.359.1028.

**Noxubee County School District  
Roger Liddell, Superintendent**

**Virgil Jones, Jr. Elementary School  
Ms. Williams, Principal  
Attended by: Mr. Binion and Mr. Woods**

### **Findings:**

#### **Exterior**

- Unlabeled main utilities were unlabeled.
- Unsecured A/C panels.
- Unprotected lights near library exit doors.
- Unprotected lights above East hall entrance.

#### **Classrooms**

- Unsecured Helium tank in room 1.
- Unprotected electrical outlet in room 8 on West wall.
- Curtains covering second means of egress windows in several rooms.
- Second means of egress windows were not labeled in several rooms.
- Expired portable fire extinguisher in the portable classroom.
- No Ground Fault Circuit Interrupter (GFCI) type receptacle on water fountain in library.

## **Restrooms**

- Unprotected lights in the boys' main hall restroom.
- Unprotected lights in the East hall restrooms.

## **Halls**

- No Ground Fault Circuit Interrupter (GFCI) type receptacles on water fountains.
- No exit/emergency lights in halls.
- Unprotected lights in halls.
- Main hall West exit door would not open.

## **Gymnasium**

- No evacuation maps posted.
- Inoperable Emergency/exit lights.
- No seating capacity posted.

## **Dining Area**

- No portable fire extinguisher in the stage area.
- Unprotected lights in the stage area.
- Inoperable emergency/exit lights.
- No panic hardware on South exit doors.
- No door closers on the South exit doors.

## **Playground**

- Insufficient fall surfacing material.

## **Corrective Actions:**

- Label all main utility shut-offs.
- Secure exterior A/C panels.
- Provide covers for all unprotected lights.
- Secure helium tank in room 1.
- Provide covers for all unprotected electrical outlets.
- Remove curtains/paper from all second means of egress windows.
- Verify classroom second means of egress windows are labeled.
- Have all out-of-date portable fire extinguishers inspected, tested, and tagged.

- Install GFCI type receptacles where needed.
- Install exit/emergency lighting in halls and gymnasium.
- Post evacuation maps in the gymnasium.
- Post seating capacity in the gymnasium.
- Install a portable fire extinguisher in the stage area.
- Install panic door hardware where needed.
- Install door closers where needed.
- Repair or replace all damaged door closers.

**B. F. Liddell Elementary School**  
**Ms. Holli Jenkins-Chandler, Principal**  
**Attended by: Mr. McFarland**

**Findings:**

**Interior**

- No campus map posted in main office identifying locations of main utility shut-offs.
- Fire alarm system was in trouble mode.

**Exterior**

- Unlabeled main utility shut-offs.

**Classrooms**

- Curtains covering second means of egress window in several rooms.
- Unprotected electrical outlet in room 7.
- Windows did not meet Life Safety Code for use as a second means of egress.
- Door closer missing in rooms 2 and 3.
- Power strips plugged into power strips in room 1.

**Hallways**

- Floor tile missing in old elementary building.

**Auditorium**

- Expired portable fire extinguisher in the stage area.

## **Restrooms**

- Floor tile missing in boy's restroom.

## **Corrective Actions:**

- Post campus map in main office identifying locations of main utility shut-offs.
- Repair fire alarm system.
- Label all main utility shut-offs.
- Remove curtains/paper from all second means of egress windows.
- Provide covers for all unprotected electrical outlets.
- Install steps so classroom windows will meet Life Safety Code.
- Replace missing door closers.
- Verify all power strips plug directly into a permanent power source.
- Replace damaged floor tile.
- Have all out-of-date portable fire extinguishers inspected, tested, and tagged.

## **Earl Nash Elementary School Mr. Richard Baliko, Principal**

### **Findings:**

#### **Interior**

- Unprotected lights in the principal's office.
- Unprotected lights in the main office work room.
- General cleaning and painting needed campus wide.

#### **Exterior**

- Loose electrical conduit outside the cafeteria entrance by the A hall.
- Main utility shut-offs were not labeled.
- Brick retaining wall near front entrance was deteriorating.
- Old pallets and a ladder was lying near the A hall.

#### **Main Hall B**

- Exit signs/emergency lighting could not be tested.
- Electrical extension cord plugged into a power strip in room 1-B.
- Additional electrical outlets needed in classrooms.
- Power strips plugged into power strips in rooms 6-B, and 7-B.

- Loose electrical conduit in the parent coordinator room.
- No evacuation map posted in room 9-B.
- Missing urinal in the boys' restroom.
- Inoperable light fixture in the boys' restroom.
- Paper/curtains covering egress windows in several rooms.

### **Main Hall C**

- Paper/curtains covering egress windows in several rooms.
- Exit signs/emergency lighting could not be tested.
- No Ground Fault Circuit Interrupter (GFCI) type receptacle on water fountains outside the library.
- Unprotected lights in the library.
- No Ground Fault Circuit Interrupter (GFCI) type receptacle near sink in the library.
- Power strips plugged into power strips in rooms 1-C, 5-C, 6-C, 8-C, 11-C, and the computer lab.
- Open blanks in the janitors lounge electrical panel.
- Electrical extension cords being used as a permanent power source in rooms 3-C, 4-C, and 6-C.
- No evacuation map posted in room 6-C.
- Second means of egress window not labeled in room 3-C.
- Unprotected lights in the main hall.

### **Main Hall A**

- Expired portable fire extinguishers in rooms 1-A, 2-A, 3-A, 4-A, and 5-A.
- Power strips plugged into power strips in rooms 2-A, 3-A, and 4-A.
- Restroom maintenance needed (cleaning, painting, fixtures, etc.).
- Unprotected lights in the janitor's closet by the boys' restroom.
- Gas equipment stored in the janitor's closet.
- No Ground Fault Circuit Interrupter (GFCI) type receptacle on water fountains.

### **Kitchen/Dining Area**

- Damaged door closer near A hall.
- Additional portable fire extinguisher needed in the dining area.
- No door closers on East exit doors.
- No fire safety training for kitchen staff.
- No pressure vessel certificate posted near equipment.
- No evacuation maps posted in the dining area.

- No seating capacity posted in the dining area.

### **Administration Building**

#### **Gymnasium**

- Damaged door closers.
- Damaged exit signs.
- Damaged emergency lighting.
- Inoperable water fountain by the stage area.
- No Ground Fault Circuit Interrupter (GFCI) type receptacle on the water fountain.
- No evacuation maps posted.

#### **SPED Wing**

- Padlocks and hasps on exit doors leading from gymnasium into SPED wing.
- No Ground Fault Circuit Interrupter (GFCI) type receptacle on the water fountain.
- Inoperable emergency light above exit door.

#### **Playground**

- Fall surfacing material had become compressed.

#### **Corrective Actions:**

- Provide covers for all unprotected lights.
- Provide campus wide maintenance to improve the overall appearance of the facilities.
- Secure all loose electrical conduit.
- Label all main utility shut-offs.
- Repair brick retaining wall near front entrance.
- Remove old pallets and ladder outside A wing.
- Test all exit signs/emergency lighting to verify battery backup.
- Provide a permanent power source where electrical extension cords are being used.
- Install additional electrical outlets in B hall classrooms.
- Verify all power strips plug directly into a permanent power source.
- Post evacuation maps in all classrooms in same general location.
- Replace missing urinal in B hall boys' restroom.
- Repair or replace all inoperable light fixtures.
- Remove all paper/curtains from second means of egress windows.

- Install GFCI type receptacles near water fountains/sinks where needed.
- Provide covers for open blanks in janitor's lounge electrical panel.
- Verify all second means of egress windows are labeled and kept unobstructed.
- Have all out-of-date portable fire extinguishers inspected, tested, and tagged.
- Provide restroom maintenance to improve overall function and appearance.
- Remove gas equipment from A hall janitor's closet and store elsewhere outside interior of building.
- Repair or replace all damaged/missing door closers.
- Provide an additional portable fire extinguisher in the dining area.
- Provide yearly fire safety training for all kitchen staff.
- Post updated pressure vessel certificate near equipment.
- Post evacuation maps in the dining area and gymnasium.
- Post seating capacity in the dining area.
- Repair or replace all damaged/inoperable exit signs.
- Repair or replace all damaged/inoperable emergency lighting.
- Repair or replace inoperable water fountain by stage area in the gymnasium.
- Remove padlocks and hasps on gymnasium exit doors in the SPED wing.

### **B.F. Liddell Middle School**

**Mr. Andrew McFarland, Principal**

**Attended by: Mr. McFarland**

### **Findings:**

#### **Interior**

- No campus map posted in main office identifying locations of main utility shut-offs.
- No power on the fire alarm system.
- Elevator was not working.

#### **Exterior**

- Unlabeled main utility shut-offs.

#### **Stairwells**

- No emergency lighting.

#### **Halls**

- Missing door closer on the middle door in lower hall.

- Broken door glass on East annex exit door.

### **Kitchen/Dining Area**

- Vent-hood needed cleaning.
- No seating capacity posted.

### **Classrooms**

- Curtains covering second means of egress window in several rooms.
- Unprotected electrical outlet on the West wall in room 4.

### **Gymnasium**

- Several broken windows on the North wall.
- Inoperable A/C.
- Damaged exit/emergency lights.
- Damaged door closer on the boys' locker room door.
- No seating capacity posted.
- Discharged portable fire extinguisher on the playing surface.
- Unprotected electrical outlet on North wall in the laundry room.
- Emergency lighting needed in stairwells.

### **Corrective Actions:**

- Post campus map in main office identifying locations of main utility shut-offs.
- Repair fire alarm system.
- Repair elevator.
- Label all main utility shut-offs.
- Install emergency lighting in stairwells.
- Install door closers where needed.
- Replace broken door glass on East annex hall exit door.
- Post seating capacity in the dining area.
- Clean vent-hood in cooking area.
- Remove curtains/paper from all second means of egress windows.
- Provide covers for all unprotected electrical outlets.
- Replace broken windows in the gymnasium.
- Repair A/C in gymnasium.

- Repair damaged emergency/exit lights.
- Replace damaged door closers.
- Post seating capacity in gymnasium.
- Have all out-of-date portable fire extinguishers inspected, tested, and tagged.
- Install emergency lighting in stairwells.

## **Noxubee County High School**

**Mr. Covington, Principal**

**Attended by: Mr. Binion**

### **Findings:**

#### **Interior**

- No campus map posted in main office identifying locations of main utility shut-offs.
- Fire alarm system was in trouble mode.

#### **Exterior**

- Unlabeled main utility shut-offs.

#### **Gymnasium**

- No portable fire extinguisher in the stage area.
- Portable fire extinguisher was missing on the playing surface.
- Inoperable emergency lights.
- No seating capacity posted.
- Damaged panic hardware on the Northwest exit door.

#### **Classrooms**

- Second means of egress windows were not labeled in several rooms.

#### **Field House**

- Unprotected lights in locker rooms.
- Missing water fountain in the weight room.
- Damaged toilet lids in restroom.
- Inoperable intercom system.
- Unlabeled second means of egress window in the band room.

**Corrective Actions:**

- Post campus map in main office identifying locations of main utility shut-offs.
- Repair fire alarm system.
- Label all main utility shut-offs.
- Install portable fire extinguisher in the stage area and on the playing surface.
- Post seating capacity in the gymnasium.
- Repair/replace damaged door hardware.
- Verify all classroom second means of egress windows are labeled.
- Provide covers for all unprotected lights.
- Replace missing water fountain in field house.
- Replace damaged toilet seats in field house.
- Repair intercom system in field house.

**Noxubee County Career and Technical Center****Ms. Clark, Principal****Attended by: Ms. Clark****Findings:****Interior**

- No campus map posted in main office identifying locations of main utility shut-offs.

**Exterior**

- Unlabeled main utility shut-offs.

**Halls**

- No Ground Fault Circuit Interrupter (GFCI) type receptacles on water fountains.
- Several inoperable exit/emergency lights.

**Classrooms/Shops**

- Several inoperable lights.
- Several roof leaks.
- Electrical extension cords being used as a permanent power source in the robotics room.
- Unprotected electrical outlet in room 9.
- Unprotected light in room 9.

**Corrective Actions:**

- Post campus map in main office identifying locations of main utility shut-offs.
- Label all main utility shut-offs.
- Install GFCI type receptacles where needed.
- Replace all inoperable lights.
- Replace roof.
- Provide a permanent power source where electrical extension cords are being used.
- Provide covers for all unprotected electrical outlets.
- Provide covers for all unprotected lights.

**Recommendations:**

- Provide additional fall surfacing material for playgrounds. Refer to the *Consumer Product Safety Commission's (CPSC) Handbook for Public Playground Safety* at [www.cpsc.gov](http://www.cpsc.gov).

## **Attachment G**

### **School Safety Audit Office of Safe and Orderly Schools Division of School Safety**

The following are recommendations made by staff in the Office of Safe and Orderly Schools, Division of School Safety for all schools:

#### **DISTRICT WIDE RECOMMENDATIONS:**

- Require that all administrators receive training by MDE in Crisis Response Planning.
- Administrators shall become familiar with National Incident Management System (NIMS), Incident Command System (ICS) training IS 100sc, IS 200, IS 700, and IS800.
- All visitors shall surrender identification and/or vehicle keys to the administrative office prior to visiting campuses.
- All classroom doors shall remain locked while students are present.
- All unused lockers shall be permanently secured.
- Identify a visitor entrance and waiting area at each school.
- School Resource Officers (SROs) shall be more visible in schools.
- SROs shall be more interactive at elementary and middle schools.

#### **ADDITIONAL COMMENTS:**

The MDE conducted this audit during the summer months and students were not present which limited the ability to observe an orderly atmosphere within the Noxubee County School District.

Based on confidential interviews with security staff, the MDE noted that the Law Enforcement officials (SROs) presently employed by the District are unsure if they have current law enforcement credentials. Without current law enforcement credentials, the SROs do not have the authority to conduct day-to-day law enforcement functions in the District.

The MDE made multiple attempts to locate the District's Crisis Management Plan to no avail. During interviews, staff members stated that the Board did not adopt/approve the Comprehensive Crisis Management Plans for the 2017-2018 school year and as a result, the District continued to operate from the previous year's plans both district-wide and within the individual school sites. One (1) of the plans presented to the MDE auditors reflected a date of 2013, one (1) reflected a date of 2015, and four (4) reflected dates for the 2016-2017 school year.

MDE auditors asked staff members and the Superintendent about the new hire process, and determined that there is a lack of clarity on who is responsible for receiving and keeping the background checks for new hires. The Chief SRO claims that he maintains these files and no one sees them but him. During the interview with the Chief SRO, he stated he fingerprints all new hires and sends the information to the Mississippi Department of Public Safety (MDPS) for a background check. However, when MDE asked him what he did with the information once he received it back from the MDPS he claimed it takes a long time to get the results and that he has never had one come back with a “hit” so he does nothing else with them except put them into a file. In the interview with the Superintendent, the Superintendent was unsure of who received the reports from the MDPS and said he had never seen any of them and was never aware of any being returned with any records of findings. It is unclear to what extent the District is performing criminal background investigations on its employees.

The District does not disseminate the Student Code of Conduct in accordance with Mississippi Code Ann. § 37-11-53. Staff members told the MDE auditors that the Board did not approve a new handbook for the 2017-2018 school year. Students and parents are told to “find last year’s handbook” or refer to the website which has the 2016-2017 version of the handbook that the Board did not approve.

It was noted in confidential interviews that when students are suspended from school, the Chief is directed to transport the students home. In many cases, it is without the parents’ knowledge.

Staff members in the District told MDE auditors that the preschool classes are housed in the same building with the District Office. These students must walk across the parking lot, through traffic, with no covered walk-ways to access the cafeteria. The building where the preschool students are located is unsecured.