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August 15, 2014

Dr. Michael A. Grego, Superintendent  
Pinellas County School District  
301 4<sup>th</sup> Street Southwest  
Largo, Florida 33770-2942

Dear Superintendent Grego:

We are pleased to provide the final 2013-2014 No Child Left Behind monitoring report for Pinellas County's Title I, Part A; Title I, Part D Subpart II; Title II, Part A and Title III, Part A programs. Our monitoring review resulted in no findings. Therefore, no system improvement plans are required.

The results for self-monitoring programs will be provided under a separate cover.

Sincerely,

Pam Stewart

PS/faw

Enclosure

cc: Martha Asbury  
Brian Dassler  
Chane Eplin  
Sam Foerster  
Melvin Herring, III  
Eileen McDaniel  
Sonya Morris  
Peggy Primicerio  
Jan Urbanski  
Wanda Young

**No Child Left Behind (NCLB)  
Monitoring of Local Education Agency Programs**

**2013-2014 Final Report  
Pinellas County School District**

**Florida Department of Education**

## Overview

The purpose of this report is to give feedback on the recent No Child Left Behind (NCLB) monitoring activities conducted with a Local Education Agency (LEA). Monitoring is required by federal and state regulations to ensure that federal programs are implemented with fidelity. *Education Department General Administrative Regulations* (EDGAR) at 34 CFR 80.40(a) requires the FDOE to monitor subgrant activities, "to assure compliance with applicable Federal requirements and that performance goals are being achieved." Section 1008.32, Florida Statutes, addresses the responsibility of the State Board of Education for oversight and enforcement relative to compliance.

Following desktop or onsite monitoring, the FDOE utilizes a preliminary report to identify areas where an LEA meets all requirements, requires further action, or in some cases, may not be applicable. If the LEA accepts the findings, System Improvement Plans (SIPs) should be developed in the online system for those items requiring further action after receiving the preliminary report.

If the LEA determines that the FDOE has made an error in the findings, the LEA may submit a request for reconsideration. The FDOE will convene a reconsideration panel, including NCLB program staff, the Office of Grants Management, and the Office of Federal Programs. Once the LEA receives notice of the final decision regarding each compliance item, SIPs for any remaining items that are out of compliance should be completed in the online system.

After all SIP(s) have been developed, the FDOE will issue a final report. Should the LEA not develop approvable SIP(s) within the timeline specified in the technical assistance, the final report will be issued, noting that the LEA has not met the requirements of NCLB legislation. All final reports are considered public records and will be available for public review, consistent with Florida's *Government in the Sunshine* laws and rules.

An LEA should correct finding(s) by the deadline established in the plan. All SIP(s) should be implemented by the due date for the next year's Self-Evaluation Certification. If an LEA develops a SIP that requires actions exceeding next year's deadline, the LEA remains in "Further Action Required" status until the requirements are met.

It is important to note that the FDOE reserves the right to withhold funding to and/or implement other more restrictive conditions for subgrant recipients deemed as not implementing state and federal programs with fidelity, as determined through the monitoring process.

The monitoring process serves as more than verification that LEAs meet federal and state requirements. The information is used to identify specific issues that are pervasive statewide so that the FDOE can provide targeted technical assistance to LEAs. Ultimately, monitoring serves to support the FDOE's mission to, "increase the proficiency of all students within one seamless, efficient system," thus helping LEAs achieve high quality implementation of educational programs.

**Monitoring Dates:**

Week of February 10-14, 2014

Week of March 24-28, 2014

**Program(s) Monitored:**

Title I, Part A, Improving the Academic Achievement of the Disadvantaged

Title I, Part D, Subpart 2, Local Programs for Neglected and Delinquent

Title II, Part A, Teacher and Principal Training and Recruiting

Title III, Part A, Language Instruction for Limited English Proficient and Immigrant Students

**District:**

Pinellas

**School Visited:**

BELLEAIR ELEMENTARY SCHOOL	Title III, Part A
CLEARWATER HIGH SCHOOL	Title III, Part A
HIGH POINT ELEMENTARY SCHOOL	Title III, Part A
NORTHWEST ELEMENTARY SCHOOL	Title III, Part A
OAK GROVE MIDDLE SCHOOL	Title III, Part A
PINELLAS COUNTY SUPERINTENDENT'S OFFICE	Title III, Part A

**Team Leader/Reviewer:**

Mark Drennan	Title III, Part A	FDOE Bureau of Student Achievement through Language Acquisition
Melvin Herring	Title I, Part D Subpart 2	FDOE Bureau of Federal Educational Programs
Sally Hugo	Title I, Part A	FDOE Bureau of Federal Educational Programs
Sandra Lesley	Title I, Part A	FDOE Bureau of Federal Educational Programs
Peggy Primicerio	Title II, Part A	FDOE Bureau of Educator Recruitment

**Positive Notes:**

*Title I, Part D Subpart 2 (Pinellas):*

This follow-up desktop monitoring review has revealed that Pinellas County's Neglected and Delinquent program has done an excellent job of addressing the expenditure challenges faced during the 2013-2014 school year. This was the only major concern that was identified during the monitoring risk assessment process.

*Title II, Part A (Pinellas):*

The Title II, Part A director had prepared and organized documentation in an easy-to-follow format. She always goes the extra mile to ensure the Title II, Part A program is being implemented with fidelity.

<p>Title I, Part A, Improving the Academic Achievement of the Disadvantaged</p>	<p><b>Requirements Met</b>  <b>Compliance Item(s):</b> DIA-1, DIA-2, DIA-3, DIA-4, DIA-5, DIA-6, HIA-1, IIA-1, IIA-3, IIA-4, IIA-5, IIA-6, KIA-1, KIA-2, KIA-3, KIA-4, KIA-5, KIA-6</p> <p><b>Further Action Required</b>  <b>Compliance Item(s):</b></p> <p><b>Not Applicable</b>  <b>Compliance Item(s):</b> AIA-1, AIA-2, AIA-3, AIA-4, AIA-5, AIA-6, AIA-7, CIA-1, CIA-2, CIA-3, IIA-2, LIA-1</p>
<p>Title I, Part D, Subpart 2, Local Programs for Neglected and Delinquent</p>	<p><b>Requirements Met</b>  <b>Compliance Item(s):</b> IID2-1, IID2-2</p> <p><b>Further Action Required</b>  <b>Compliance Item(s):</b></p> <p><b>Not Applicable</b>  <b>Compliance Item(s):</b></p>
<p>Title II, Part A, Teacher and Principal Training and Recruiting</p>	<p><b>Requirements Met</b>  <b>Compliance Item(s):</b> AIIA-1, AIIA-2, AIIA-3, AIIA-4, BIIA-1, BIIA-2, BIIA-3, CIIA-1, DIIA-1, EIIA-1, FIIA-1, GIIA-1, HIIA-1, JIIA-1</p> <p><b>Further Action Required</b>  <b>Compliance Item(s):</b></p> <p><b>Not Applicable</b>  <b>Compliance Item(s):</b> IIIA-1</p>
<p>Title III, Part A, Language Instruction for Limited English Proficient and Immigrant Students</p>	<p><b>Requirements Met</b>  <b>Compliance Item(s):</b> AIIIA-1, AIIIA-2, BIIIA-1, BIIIA-2, CIIIA-1, DIIIA-1, GIIIA-1, HIIIA-1, IIIIA-1</p> <p><b>Further Action Required</b>  <b>Compliance Item(s):</b></p> <p><b>Not Applicable</b>  <b>Compliance Item(s):</b></p>

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item AIA-1 (Not Applicable):** The Local Educational Agency (LEA) shall:

- annually review and report the progress of each school and student served under this part to parents, teachers, principals, schools, and the community; and
- disseminate the required information outlined in section 1111 (the annual report card) to all schools served by the LEA and all parents of students attending those schools in a format and, to the extent practicable, in a language that parents can understand, and make the information widely available through public means.

*Sections 1111(h)(2)(B) and (E), 1112(b)(1)(A)(i) and (B), P.L.107-110; 34 CFR, Part 200, Section 200.30(a) and (c)(1)*

Not Applicable: This compliance item is not applicable for a desktop review.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs  
Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas

**Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item AIA-2 (Not Applicable):** The Local Educational Agency (LEA) and Title I schools shall use assessments to:

- determine the success of children served in meeting the state student academic achievement standards;
- assist in diagnosing, teaching, and learning in the classroom to enable low-achieving students to meet the state academic achievement standards;
- determine what revisions are needed to the Title I program; and
- identify students who may be at risk of reading failure.

*Section 1112(b)(1)(A), P.L.107-110*

Not Applicable: This compliance item is not applicable for a desktop review.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs

Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item AIA-3 (Not Applicable):** The Local Educational Agency (LEA) shall ensure that schools implementing schoolwide programs conduct a comprehensive needs assessment (CNA) of the entire school, while taking into account the needs of migratory children, which is based on student achievement data related to the state academic content standards and the state academic achievement standards.

*Section 1114(b)(1)(A), P.L.107-110; 34 CFR, Part 200, Section 200.26(a)(1)*

Not Applicable: This compliance item is not applicable for a desktop review.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs  
Sandra Lesley, FDOE Bureau of Federal Educational Programs



## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item AIA-4 (Not Applicable):** The Local Educational Agency (LEA) shall ensure that schools implementing schoolwide programs include the required components outlined in section 1114(b). LEAs shall ensure that schools implementing schoolwide programs must conduct the requirements in Title 34 of the Code of Federal Regulations (CFR), Part 200.26(c) for evaluating schoolwide programs.

*Section 1114(b)(1)(A)-(J) and (b)(2)(A-B)(i-iv); 118(c)(4)(c) and (5) P.L. 107-110; 34 CFR, Part 200.26(c), Section 200.26(a)(1) and (b) and 200.28*

Not Applicable: This compliance item is not applicable for a desktop review.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs  
Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item AIA-5 (Not Applicable):** If a Local Educational Agency (LEA) implements targeted assistance programs in Title I schools, the LEA shall ensure that schools abide by the requirements in section 1115 and include the requirements found in section 1115(c)(1)(A-H) in the targeted assistance program plan.

*Section 1115(a), (b), and (c)(1)(A-H), P.L.107-110*

Not Applicable: The LEA has no schools operating targeted assistance programs.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs

Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item AIA-6 (Not Applicable):** The Local Educational Agency (LEA) shall ensure that each school conducting a targeted assistance program assists participating children in meeting the state's proficient and advanced levels of achievement by:

- coordinating resources under this part with other resources
- reviewing the progress of participating children to improve the program; and
- providing additional assistance to enable each child to meet the state's challenging student academic achievement standards, if necessary.

*Section 1115 (c)(2)(A)(B), P.L.107-110*

Not Applicable: The LEA has no schools operating targeted assistance programs.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs

Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item AIA-7 (Not Applicable):** The Local Educational Agency (LEA) shall:

- ensure that each school implementing a Title I program devotes sufficient resources to effectively carry out high quality and ongoing professional development for teachers, principals, and paraprofessionals and, if appropriate, pupil services personnel, parents, and other staff to enable all students to meet the state's academic achievement standards; and
- coordinate Title I, Part A programs with Title II, Part A to provide professional development for teachers and principals, and if appropriate, pupil services personnel, administrators, parents, and other staff, including LEA level staff.

*Sections 1112 (b)(1)(D); 1114(a)(4) and (b)(1)(D); 1115(e)(3), P.L.107-110; 34 CFR, Part 200*

Not Applicable: This compliance item is not applicable for a desktop review.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs  
Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item CIA-1 (Not Applicable):** The Local Educational Agency (LEA) shall coordinate activities found in section 1120B(b) with Head Start agencies and, if feasible, other entities who carry out early childhood development programs.

*Section 1112(b)(1)(E)(i) and 1120B(a), P.L.107-110*

Not Applicable: This compliance item is not applicable for a desktop review.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs

Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item CIA-2 (Not Applicable):** The Local Educational Agency (LEA) shall coordinate and integrate services provided in Title I programs with services for children with limited English proficiency, children with disabilities, migratory children, neglected or delinquent children and youth, homeless children, and immigrant children in order to increase program effectiveness, eliminate duplication, and reduce fragmentation of the instructional program.

*Section 1112(b)(1)(E)(ii), P.L. 107-110*

Not Applicable: This compliance item is not applicable for a desktop review.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs  
Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item CIA-3 (Not Applicable):** The Local Educational Agency (LEA) conducts meaningful collaboration on an ongoing basis with the McKinney-Vento homeless liaison to ensure that students in homeless situations receive appropriate Title I, Part A services.

*Sections 1112(b)(1)(O); 1114(b)(1)(J); 1115(c)(H); P.L. 107-110*

Not Applicable: This compliance item is not applicable for a desktop review.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs  
Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item IIA-2 (Not Applicable):** The Local Educational Agency (LEA) shall ensure that each school implementing a targeted assistance program:

- identifies all eligible students within the school, including migrant, neglected, delinquent, and homeless children and those children who participated in Head Start, Even Start, Early Reading First;
- ranks eligible students based on multiple, educationally related, objective criteria; and
- utilizes a selection process to ensure that the most academically needy students are served first.

*Section 1115(b)(1),(2)(A-E), P.L.107-110*

Not Applicable: The LEA has no schools operating targeted assistance programs.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs  
Sandra Lesley, FDOE Bureau of Federal Educational Programs



## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title I, Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item LIA-1 (Not Applicable):** The Local Educational Agency (LEA) shall ensure that all instructional staff working in schools, funded wholly or in part with Title I, Part A, meet the statutory requirements of being highly qualified. The LEA must ensure instructional paraprofessionals work under the direct supervision of a teacher.

*Section 1119(a)(1) and (g)(3)(A), P.L. 107-110; 34 CFR, Part 200, Section 200.58(a)(1)*

Not Applicable: This compliance item is not applicable for a desktop review.

**FDOE Monitor(s):**

Sally Hugo, FDOE Bureau of Federal Educational Programs

Sandra Lesley, FDOE Bureau of Federal Educational Programs

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas                      **Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title II, Part A, Teacher and Principal Training and Recruiting

**Compliance Item IIIA-1 (Not Applicable):** The Local Educational Agency (LEA) shall target funds to schools within the jurisdiction of the LEA that have the lowest proportion of highly qualified teachers (HQTs), have the largest average class size, or have a school grade of D or F (Focus or Priority School respectively).

*Section 2122(b)(3)(A-C), P.L.107-110*

Not Applicable: Title II, Part A funds were not used to further reduce class size.

**FDOE Monitor(s):**

Peggy Primicerio, FDOE Bureau of Educator Recruitment

## 2013-2014 NCLB Monitoring Findings

**LEA:** Pinellas

**Monitoring Dates:** February 10-14, 2014

**Program Monitored:** Title II, Part A, Teacher and Principal Training and Recruiting

**Compliance Item JIIA-1 (Requirement(s) Met):** The Local Educational Agency (LEA) maintains appropriate budgetary records and reports for this program. All documents to support compliance are on file with the LEA as records to support program expenditures.

*Section 2122(a), P.L. 107-110*

**Recommendations:**

In reviewing documents, it was difficult to ensure that substitutes and stipends are being paid for and to appropriate staff under the regulations of the Title II, Part A without labor intensive cross checking. We recommend that forms be modified to include the certification area of the teacher receiving a substitute and/or stipend for attendance in professional development activities.

**FDOE Monitor(s):**

Peggy Primicerio, FDOE Bureau of Educator Recruitment

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