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State Board of Education

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Commissioner of Education

August 8, 2016

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 attach Pinellas County's No Child Left Behind (NCLB) monitoring report as a follow-up to the monitoring review conducted by the Florida Department of Education (FDOE) for the 2015-2016 monitoring cycle. For any compliance item requiring further action, the specific finding(s) will assist in the development of the required system improvement plans (SIPs).

Should you find that there is a factual error in the report, you may request reconsideration of the finding(s). The FDOE will convene a leadership panel and respond with a final decision. Any requests for reconsideration should be made in writing and sent within 10 working days from today to the Bureau of Federal Educational Programs.

If you do not request reconsideration of findings, the report becomes final. A SIP for each finding must be submitted to the FDOE by August 26, 2016, acknowledging that the findings are accurate and agreeing to correct them. These should be completed using the attached SIP template and emailed to [bfep@fldoe.org](mailto:bfep@fldoe.org). Should the local educational agency (LEA) fail to submit approvable SIPs within 20 working days, the final report will note that the LEA was unresponsive.

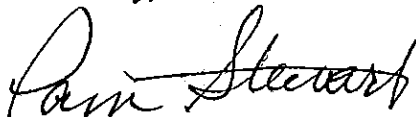
Further information, including the 2015-2016 NCLB Monitoring Frequently Asked Questions and the Online Monitoring System Technical Assistance Manual, can be found on our website at <http://www.fldoe.org/policy/edu-laws-legislation/no-child-left-behind/monitoring-for-selected-programs-under.shtml>.

Superintendent Grego  
August 8, 2016  
Page Two

For assistance in completing the SIPs online, or to request reconsideration, please refer to our website. In addition, you may contact the Bureau of Federal Educational Programs via phone at 850-245-0479 or email at [bfep@fldoe.org](mailto:bfep@fldoe.org) for support. LEAs may request reconsiderations via email to [bfep@fldoe.org](mailto:bfep@fldoe.org) or mail it to the address below.

Bureau of Federal Educational Programs  
Florida Department of Education  
325 West Gaines Street Suite 352  
Tallahassee, Florida 32399-0400  
Attention: Sonya G. Morris

Sincerely,



Pam Stewart  
Commissioner of Education

PS/sgm

Enclosure

cc: Martha Asbury  
Brian Dassler  
Erika Hall  
Michael Stowell  
Curlis Knowles  
Annette Jackson  
Charlene Thompson  
Kimberly Williams

## Florida Department of Education

NCLB Monitoring Application

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

**2015-2016 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) and Uniform Grant Guidance 2 Code of Federal Regulations Subpart D 200.38 (a) and 200.331 (d), requires the Florida Department of Education (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, once the LEA receives notice of the final decision regarding each compliance item; 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 8-12, 2016

**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 X, Part C, Homeless Education Program

**District:**

Pinellas

**School Visited:**

AMI KIDS CENTER FOR PERSONAL GROWTH	Title I, Part D, Subpart 2
CAMPBELL PARK ELEMENTARY SCHOOL	Title I, Part A
CHARLES BRITT ACADEMY	Title I, Part D, Subpart 2
FITZGERALD MIDDLE SCHOOL	Title X, Part C
GIBBS HIGH SCHOOL	Title I, Part A
JAMES B. SANDERLIN PK-8	Title X, Part C
LAKEWOOD HIGH SCHOOL	Title X, Part C
LARGO HIGH SCHOOL	Title X, Part C
MAXIMO ELEMENTARY SCHOOL	Title X, Part C
PACE CENTER FOR GIRLS	Title I, Part D, Subpart 2
PINELLAS COUNTY JAIL	Title I, Part D, Subpart 2
PINELLAS JUVENILE DET CENTER	Title I, Part D, Subpart 2
PLATO ACADEMY LARGO CHARTER SCHOOL	Title X, Part C

**Private School Visited:**

Indian Rocks Christian School	Title I, Part A
NA	Title X, Part C

**Home Visited:**

NA	Title X, Part C
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**Team Leader/Reviewer:**

Skip Forsyth	Title X, Part C	FDOE Bureau of Federal Educational Programs
Erika Hall	Title I, Part A	FDOE Bureau of Federal Educational Programs
Melvin Herring	Title I, Part D, Subpart 2	FDOE Bureau of Federal Educational Programs
Michael Stowell	Title I, Part A	FDOE Bureau of Federal Educational Programs

**Positive Notes:**

*Title I, Part A (Pinellas):*

The Florida Department of Education (FDOE) Title I, Part A monitoring team observed evidence of effective communication and shared knowledge among federal programs staff at Pinellas County Schools (PCS), as staff meet and collaborate on a frequent basis to reduce fragmentation and improve the overall implementation of all federal programs.

School administrators reported a high level of satisfaction with the Title I, Part A staff at the LEA in terms of the staff's consistency in providing ongoing technical assistance and updates pertaining to Title I, Part A program requirements.

Additionally, school staff at each of the schools monitors visited were able to clearly articulate how student performance data drives their respective needs assessments, how frequently data is collected and analyzed, and how school plans are evaluated to determine any necessary revisions to strategies, activities, and services. The monitoring team observed an example of data-driven progress monitoring at Campbell Park Elementary, for example, where administrators demonstrated how both student performance and teacher effectiveness are continuously monitored on an individual basis to identify areas for improvement.

PCS has made a significant investment in a partnership with The New Teacher Project (TNTP), and at least one administrator at a school where this investment has been made, expressed satisfaction with the teacher/administrator support system created by the partnership. This administrator said TNTP has played a vital role in helping to transform the school culture and provide a safe learning environment for all students. FDOE urges PCS to continue exploring ways to disseminate information about this initiative and other successful programs being implemented at Title I schools to the community at large.

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

There has been a positive shift in the oversight of programs supported by Title I, Part D funds. The consistent presence of the LEA's Educational Alternative Services (EAS) department is evident by the support provided to all neglected, delinquent and at-risk programs served by the LEA. These efforts even extend to the two Eckerd programs that are located outside of Pinellas County, where the EAS Administrator and program monitor maintain a regular onsite monitoring schedule.

The EAS department does an excellent job of coordinating services with other areas of the LEA to ensure that academic services in neglected, delinquent and at-risk settings are well supported. It is evident through the existence of Accounting Clerks, Social Workers, Transition Specialists, Testing Coordinators and Technology Specialists that are all knowledgeable of the unique nuances of the operations of non-traditional schools being supported by Title I, Part D.

*Title X, Part C (Pinellas):*

In 2014-2015, the Pinellas County School District (the LEA) posted a moderate Homeless Student Identification Rate of 7.3%. The LEA's effort to identify and serve homeless children and youth through its homeless education program (Project HEAT) is supported by strong working relationships with the Educational Alternative Services, Title I, Part A, Transportation, Student Services, Data Systems, community partners, and funding from the Title I, Part A Homeless Set-Aside. Staff interviewed at the schools visited were well aware of Project HEAT and its services. They consistently reported that Project HEAT staff are responsive to their needs and inquiries.

**Noteworthy Practices:**

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

The after school C-tech program offered at the Charles Britt Academy is a rare example of career and technical education services being provided to DJJ students outside of the normal school hours. Because of security and staffing concerns it is extremely rare that DJJ students have the opportunity to continue their academic growth within a classroom setting during the evening hours.

The implementation of GradPoint in several Title I, Part D programs is a clear effort to ensure that students in these programs receive educational opportunities that are comparable to those offered to students in traditional school settings.

*Title X, Part C (Pinellas):*

The HEAT Program and schools track multiple data points to identify homeless children and youth, including the Student Residence Questionnaire as part of the enrollment packet, out-of-zone transportation requests, uncharacteristic tardies or absences, sudden reduction in classroom performance, lack of documentation at enrollment, etc.

The HEAT Program maintains strong relationships with community partners and a strong and reliable process for referring homeless students to community services.

The HEAT Program conducts a robust training and technical assistance effort for school-level staff, including food service staff and bus drivers, regarding the identification and educational rights of homeless children and youth.

The HEAT Program employs a case management approach to assure that the challenges and barriers experienced by homeless children and youth are identified and removed.

Title I Part A, Improving the Academic Achievement of the Disadvantaged	<b>Requirements Met</b> <b>Compliance Item(s):</b> AIA-1, AIA-2, AIA-3, AIA-4, AIA-7, CIA-1, CIA-2, CIA-3, DIA-1, DIA-2, DIA-3, DIA-4, DIA-5, DIA-6, HIA-1, IIA-1, IIA-3, IIA-5, IIA-6, KIA-1, KIA-2, KIA-3, KIA-4, KIA-5, KIA-6, LIA-1
	<b>Further Action Required</b> <b>Compliance Item(s):</b> IIA-4
	<b>Not Applicable</b> <b>Compliance Item(s):</b> AIA-5, AIA-6, IIA-2
Title I, Part D, Subpart 2, Local Programs for Neglected and Delinquent	<b>Requirements Met</b> <b>Compliance Item(s):</b> AID2-1, AID2-2, AID2-3, BID2-1, CID2-1, CID2-2, CID2-3, HID2-1, IID2-1, IID2-2
	<b>Further Action Required</b> <b>Compliance Item(s):</b> IID2-3
	<b>Not Applicable</b> <b>Compliance Item(s):</b>
Title X, Part C, Homeless Education Program	<b>Requirements Met</b> <b>Compliance Item(s):</b> AXC-1, AXC-2, AXC-3, AXC-4, AXC-5, AXC-6, AXC-7, BXC-1, CXC-1, CXC-2, CXC-3, GXC-1, GXC-2, HXC-1, IXC-1, IXC-2, IXC-3, KXC-1
	<b>Further Action Required</b> <b>Compliance Item(s):</b>
	<b>Not Applicable</b> <b>Compliance Item(s):</b>



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

There is concern with the LEA's limited involvement in the educational program being provided at the AMIKids program. Efforts have been made to strengthen the oversight between the AMIKids program and the LEA. However, oversight has been inconsistent with Florida Statutes section 1003.52 (3), which provides that the LEA shall provide the appropriate program of instruction.

*Title X, Part C (Pinellas):*

There are no overarching concerns, though there were several schools with high FRPLP counts and low homeless student identification rates. Recommendations for improving the consistency of identification and service across schools are provided in AXC-3.

**2015-2016 NCLB Monitoring Findings**

LEA: Pinellas

Monitoring Dates: February 8-12, 2016

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

**Compliance Item AIA-4 (Requirement(s) Met):** 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*

**Recommendations:**

In interviews with some school-based administrators, FDOE monitors determined that several school administrators lack an understanding of how Title I, Part A funds can be used to update the entire educational program in a schoolwide program other than utilizing funds to support instructional strategies. For example, at one school the monitoring team visited, an administrator expressed interest in purchasing college pennants in an effort to motivate students and improve the school's climate. The administrator assumed that the proposed expenditure would violate the "supplement, not supplant" provision outlined in ESEA and also that the items would not be allowable because the purchase would not be directly related to the implementation of an instructional strategy.

However, a school operating a schoolwide program is not required to provide only supplementary services to children, as would be required for schools operating targeted assistance programs (or for LEA-level activities). Schools operating schoolwide programs are also not required to use Title I, Part A funds only for instructional activities either. According to a policy letter disseminated by the United States Department of Education (USDE) in July of 2015, Title I, Part A funds may be used to "improve attendance, school climate, counteract bullying, or provide positive behavioral interventions and supports at the school level." While school officials should align any proposed expenditures with needs identified in the school's comprehensive needs assessment and strategies articulated in the schoolwide plan, school administrators have some flexibility in how they spend their funds.

As a result, FDOE encourages the LEA to adopt measures to improve communication with school administrators regarding the flexible use of Title I, Part A funds in schoolwide programs.

**FDOE Monitor(s):**

Michael Stowell, FDOE Bureau of Federal Educational Programs  
Erika Hall, FDOE Bureau of Federal Educational Programs

**2015-2016 NCLB Monitoring Findings**

LEA: Pinellas

Monitoring Dates: February 8-12, 2016

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

**Compliance Item AIA-5 (Not Applicable):** If an 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):**

Michael Stowell, FDOE Bureau of Federal Educational Programs  
Erika Hall, FDOE Bureau of Federal Educational Programs

**2015-2016 NCLB Monitoring Findings**

LEA: Pinellas                      **Monitoring Dates:** February 8-12, 2016

**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):**

Michael Stowell, FDOE Bureau of Federal Educational Programs

Erika Hall, FDOE Bureau of Federal Educational Programs

#### 2015-2016 NCLB Monitoring Findings

LEA: Pinellas                      **Monitoring Dates:** February 8-12, 2016

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

**Compliance Item DIA-2 (Requirement(s) Met):** The Local Educational Agency (LEA) shall:

- expend funds for educational services and other benefits to eligible private school children equal to the proportion of funds allocated to participating school attendance areas, based on the number of children aged 5-17 from low-income families who attend participating private schools, using the allowable methods described in section 1120(c)(1);
- ensure that participating private school students are provided equitable educational services and other benefits in a timely manner; and
- ensure that teachers and parents of participating private school students are provided services and activities on an equitable basis pursuant to sections 1118 and 1119.

*Section 1120 (a), P.L. 107-110; 34 CFR, Part 200, Section 200.62(b)(1), 200.64(a) and (b) and 200.65(a)(1-2)*

**Recommendations:**

While the LEA provided evidence that it will spend parental involvement funds for parents of participating private school students for 2015-16, it should ensure that expenditures for this purpose are spent earlier in the school year to ensure the LEA is meeting the needs of private school parents in a timely fashion.

**FDOE Monitor(s):**

Michael Stowell, FDOE Bureau of Federal Educational Programs

Erika Hall, FDOE Bureau of Federal Educational Programs

#### 2015-2016 NCLB Monitoring Findings

LEA: Pinellas                      **Monitoring Dates:** February 8-12, 2016

**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):**

Michael Stowell, FDOE Bureau of Federal Educational Programs  
Erika Hall, FDOE Bureau of Federal Educational Programs

**2015-2016 NCLB Monitoring Findings**

LEA: Pinellas

Monitoring Dates: February 8-12, 2016

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

**Compliance Item IIA-4 (Further Action Required):** The Local Educational Agency (LEA) shall use Title I, Part A funds deemed reasonable and necessary for proper and efficient performance and administration of the Title I, Part A program. Title I, Part A funds may only be used to supplement and not supplant non-federal funds used for the education of participating children.

*Section 1120A(b), P.L. 107-110***Finding(s):**

The LEA should:

- provide a copy of its Staffing Plan for review.

**System Improvement Plan:**

A System Improvement Plan is not required.

**Recommendations:**

The LEA must submit to the FDOE a copy of its staffing plan and the FY 2013-2014 "budget status summary", as requested by FDOE monitors, within ten days of receiving this report.

**FDOE Monitor(s):**

Michael Stowell, FDOE Bureau of Federal Educational Programs  
Erika Hall, FDOE Bureau of Federal Educational Programs

**2015-2016 NCLB Monitoring Findings**

LEA: Pinellas

Monitoring Dates: February 8-12, 2016

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

**Compliance Item IIA-6 (Requirement(s) Met):** Any Local Educational Agency (LEA) that receives funds under section 1003(a) shall:

- serve only eligible Title I schools;
- integrate with other funds/programs awarded under NCLB, if applicable; and
- implement activities according to the approved project application.

*Section 1003(b)(1), (g)(1) and (5)(B) P.L.107-110***Recommendations:**

FDOE recommends that the LEA continue with the strategies outlined in its application pertaining to professional development and TNTP. Based on the teachers who provided feedback on the LEA's evaluation, a majority reported that teaching partnering had a positive impact on student learning. Furthermore, continuing with the aforementioned strategies will provide the LEA with the opportunity to compare 2015-16 Florida Standards Assessments (FSA) performance data with the results of the 2014-15 FSA (which would provide a more compatible set of performance data to analyze for evaluation purposes), instead of performance data for the Florida Comprehensive Assessment Test (FCAT).

**FDOE Monitor(s):**

Michael Stowell, FDOE Bureau of Federal Educational Programs  
Erika Hall, FDOE Bureau of Federal Educational Programs

**2015-2016 NCLB Monitoring Findings****LEA:** Pinellas**Monitoring Dates:** February 8-12, 2016**Program Monitored:** Title I Part A, Improving the Academic Achievement of the Disadvantaged**Compliance Item KIA-1 (Requirement(s) Met):** The Local Educational Agency (LEA) shall:

- reserve at least one (1) percent of its Title I allocation for parental involvement activities, unless the amount would be less than \$500,000;
- involve parents of children attending Title I schools in decisions regarding how the set-aside is allocated;
- determine and reserve an equitable portion to provide services to parents of eligible private school students; and
- distribute at least 95 percent of the remainder to its Title I schools for parental involvement.

*Section 1118(a)(3)(A-C), P.L. 107-110; 34 CFR, Part 200, Section 200.65***Recommendations:**

According to the LEA's 2015-15 and 2015-16 Title I, Part A applications, PCS provides the same parental involvement allocation to each Title I school. The monitoring team observed evidence that the LEA's distribution of parent involvement allocations to Title I schools does not reflect the varying degree of need for parental involvement at the schools the team visited. More specifically, the team's observation, based on interviews with school staff, revealed that the need for family literacy, parenting skills, and overall evidence-based family involvement strategies were a greater need at lower performing schools than at higher performing schools.

While it is a common practice for LEAs to reserve and distribute the same amount of parental involvement funds to each Title I school, allocating these funds strategically, as demonstrated through a needs-based approach, is consistent with the purpose of Title I, Part A funds in "closing the achievement gap between high- and low-performing children, especially the achievement gaps between minority and nonminority students, and between disadvantaged children and their more advantaged peers" [NCLB, Section 1001(3)].

Therefore, in an effort to assist PCS in strengthening its program implementation and to ensure that the LEA is meeting the unique needs of each Title I school, FDOE recommends that PCS develop procedures for allocating parental involvement funds to Title I schools in accordance with the parental involvement needs identified at each Title I school.

**FDOE Monitor(s):**

Michael Stowell, FDOE Bureau of Federal Educational Programs  
Erika Hall, FDOE Bureau of Federal Educational Programs

**2015-2016 NCLB Monitoring Findings****LEA:** Pinellas**Monitoring Dates:** February 8-12, 2016**Program Monitored:** Title I Part A, Improving the Academic Achievement of the Disadvantaged

**Compliance Item KIA-3 (Requirement(s) Met):** The Local Educational Agency (LEA) shall ensure that the LEA and each Title I school has a written parental involvement policy/plan (PIP) that: (a) was jointly developed and agreed upon with parents; (b) is updated periodically; and (c) is distributed to parents of Title I students and made available to the local community. Parents shall be notified of the policy in an understandable and uniform format and, to the extent practicable, in a language the parents can understand. Such policy shall include the components as described in section 1118(b-f).

*Section 1118(b)(1),(c-f), P.L. 107-110*

**Recommendations:**

FDOE encourages PCS to continue exploring ways the LEA and schools can report positive developments and success stories pertaining to family involvement initiatives, activities, and services to surrounding communities using any means available.

**FDOE Monitor(s):**

Michael Stowell, FDOE Bureau of Federal Educational Programs  
Erika Hall, FDOE Bureau of Federal Educational Programs

**2015-2016 NCLB Monitoring Findings**

LEA: Pinellas

Monitoring Dates: February 8-12, 2016

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

**Compliance Item LIA-1 (Requirement(s) Met):** 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)*

**Recommendations:**

While the LEA has demonstrated evidence of compliance with the highly-qualified requirements outlined in NCLB, the following data from 2014-15 indicates a disproportionate percentage of teachers with three years or less of instructional experience in the LEA's lowest performing Title I funded elementary schools to higher performing schools in the LEA:

Low Performing Schools

- Campbell Park 36%
- Fairmount Park 40%
- Lakewood 30%
- Maximo 39%
- Melrose 30%

High Performing Schools

- Azalea Elementary School 4%
- Bauder Elementary School 7%
- Bay Vista Fundamental Elementary 5%
- Brooker Creek Elementary 6%
- Joseph L. Carwise Elementary 8%

As a result, FDOE recommends that the LEA continue developing and implementing strategies to recruit and retain experienced, effective teachers in these five schools to help ensure all students meet Florida's challenging academic standards.

**FDOE Monitor(s):**

Michael Stowell, FDOE Bureau of Federal Educational Programs  
Erika Hall, FDOE Bureau of Federal Educational Programs

2015-2016 NCLB Monitoring Findings

LEA: Pinellas Monitoring Dates: February 8-12, 2016  
Program Monitored: Title I, Part D, Subpart 2, Local Programs for Neglected and Delinquent

Compliance Item AID2-3 (Requirement(s) Met): Any Local Educational Agency (LEA) that receives funds under this subpart shall ensure oversight and evaluation of the educational program in Department of Juvenile Justice (DJJ) facilities and programs supported by Title I, Part D funds.

Sections 10003.52(3) Florida Statutes; 1425, 1431(a), P.L. 107-110; Non-Regulatory Guidance

Recommendations:

The LEA should increase its impact on the educational program provided at AMIKids to ensure that it meets the same standards required of other Title I, Part D supported programs. This may require a more regular LEA presence at the facility.

FDOE Monitor(s):

Melvin Herring, FDOE Bureau of Federal Educational Programs

2015-2016 NCLB Monitoring Findings

LEA: Pinellas Monitoring Dates: February 8-12, 2016  
Program Monitored: Title I, Part D, Subpart 2, Local Programs for Neglected and Delinquent

Compliance Item IID2-2 (Requirement(s) Met): Any Local Educational Agency (LEA) that receives funds under this subpart shall use the funds appropriately for programs described in the approved application compliant with section 1424.

Section 1424, P.L. 107-110

Recommendations:

If computer-assisted instruction is funded by federal funding, it should clearly supplement a robust schedule of direct instruction.

FDOE Monitor(s):

Melvin Herring, FDOE Bureau of Federal Educational Programs

2015-2016 NCLB Monitoring Findings

LEA: Pinellas Monitoring Dates: February 8-12, 2016  
Program Monitored: Title I, Part D, Subpart 2, Local Programs for Neglected and Delinquent

Compliance Item IID2-3 (Further Action Required): Any Local Educational Agency (LEA) that receives funds under this subpart shall ensure compliance with Department of Juvenile Justice (DJJ) Program Requirements.

Sections 1401(a), 1421(1), 1425(6) P.L. 107-110; 1003.52(3),(4), (5), (7),(8),(9) Florida Statutes; U.S. Department of Education/U.S. Department of Justice-Guiding Principles for Providing High-Quality Education in Juvenile Justice Secure Care Settings (I)

Finding(s):

The LEA should:

- monitor the academic progress for each DJJ student.

*Comment: There is no evidence that the LEA has ensured that AMIKids has implemented the required common assessment. According Florida Department of Education Board Rule 6A-6.05281, all DJJ facilities are required to assess students using the common assessment as determined by the department.*

**System Improvement Plan:**

The LEA must ensure the implementation of the state-selected DJJ common assessment at the AMIKids facility by informing the facility staff of the requirement and establishing a detailed timeline for full implementation. If a definite timeline for implementation of the common assessment cannot be established, then the LEA should explore additional action, including possible termination of the agreement with AMIKids.

**FDOE Monitor(s):**

Melvin Herring, FDOE Bureau of Federal Educational Programs

**2015-2016 NCLB Monitoring Findings**

LEA: Pinellas

Monitoring Dates: February 8-12, 2016

Program Monitored: Title X, Part C, Homeless Education Program

**Compliance Item AXC-3 (Requirement(s) Met):** The Local Educational Agency (LEA) liaison shall ensure that homeless children and youth are identified by school personnel and through coordination activities with other entities and agencies. The LEA shall ensure that school staff immediately enrolls homeless students, including unaccompanied youth, even if those students do not have appropriate records normally required for enrollment, such as previous academic records, medical records, proof of residency, or other documentation. The enrolling school shall immediately contact the school last attended by a homeless child or youth to obtain relevant academic and other records. If the child or youth needs to obtain immunizations, or immunization or medical records, the enrolling school immediately shall refer the parent or guardian of the child or youth to the LEA homeless liaison. The liaison shall assist in obtaining necessary immunizations or immunization or medical records. The LEA shall maintain homeless students' records so they are available in a timely fashion when homeless students enter a new school or LEA. **NOTE: This compliance item pertains to the identification and enrollment of homeless children and youth.**

*Section 722(g)(3)(C), (g)(3)(D), (g)(6)(A)(1), P.L.107-110*

**Recommendations:**

To improve consistency in the identification of homeless children and youth across schools, identify schools with a large number of students enrolled in the Free and Reduced Price Lunch Program and a corresponding low Homeless Student Identification Rate (# of homeless students identified last year/# of students enrolled in FRPLP). Prioritize these schools for HEAT technical assistance.

**FDOE Monitor(s):**

Skip Forsyth, FDOE Bureau of Federal Educational Programs

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