



**EDUCATIONAL PERFORMANCE AUDIT
OF THE
EAST GREENWICH PUBLIC SCHOOLS**

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I. INTRODUCTION

The Town of East Greenwich is home to six (6) public schools within the town. The total student population in East Greenwich for the 2017-18 School Year was two thousand five hundred four (2,504) students. The total number of teachers employed by the East Greenwich School District (hereinafter “district”) for the 2016-17 School Year was two hundred twenty-six (226) as reported by the Rhode Island Department of Education (hereinafter “RIDE”). The Superintendent of Schools is Dr. Victor Mercurio.¹

The District is widely regarded as being made up of High Performing Schools. In 2017, sixty-three percent (63%) of all students participating in ELA State Assessments met or exceeded expectations. In Mathematics, sixty and five tenths of a percent (60.5%) of students met or exceeded expectations.²

The East Greenwich School District (hereinafter “district”) is divided into two (2) zones for its elementary schools. Students in one zone, which consists primarily of households east of South County Trail, attend Meadowbrook Farms Elementary School (hereinafter “Meadowbrook”) from Kindergarten to Grade Two and George R. Hanaford School (hereinafter “Hanaford”) from Grade Three (3) to Grade Five (5).

¹ Rhode Island Department of Education (2017). *InfoWorks! Rhode Island Education Data Reporting*. Retrieved from <http://infoworks.ride.ri.gov/district/east-greenwich>

² Rhode Island Department of Education (2017). *InfoWorks! Rhode Island Education Data Reporting*. Retrieved from <http://infoworks.ride.ri.gov/district/east-greenwich>

During the 2016-17 School Year, Meadowbrook had two hundred sixty-eight (268) enrolled students and twenty-five (25 teachers). Seven percent (7%) of Meadowbrook students were eligible for subsidized lunch. One percent (1%) of students received ESL or bilingual services and twenty percent (20%) of students received special education services.³ During the 2016-17 School Year, Hanaford had two hundred fifty-two (252) enrolled students and twenty-four (24) teachers. Seven percent (7%) of Hanaford students were eligible for subsidized lunch. One percent (1%) of students received ESL or bilingual services and fourteen percent (14%) of students received special education services.⁴

Students in the other elementary school zone, which consists primarily of households west of the South County Trail, attend Frenchtown Elementary School (hereinafter “Frenchtown”) from Kindergarten to Grade Two and James H. Eldredge School (hereinafter “Eldredge”) from Grade Three (3) to Grade Five (5).

During the 2016-17 School Year, Frenchtown had two hundred seventy-one (271) enrolled students and twenty-three (23) teachers. Twelve percent (12%) of Frenchtown students were eligible for subsidized lunch. One percent (1%) of students received ESL or bilingual services and thirteen percent (13%) received special education services.⁵

During the 2016-17 School Year, Eldredge had three hundred three (303) enrolled

³ Rhode Island Department of Education (2017). *InfoWorks! Rhode Island Education Data Reporting*. Retrieved from <http://infoworks.ride.ri.gov/school/meadowbrook-farms-school>

⁴ Rhode Island Department of Education (2017). *InfoWorks! Rhode Island Education Data Reporting*. Retrieved from <http://infoworks.ride.ri.gov/school/george-hanaford-school>

⁵ Rhode Island Department of Education (2017). *InfoWorks! Rhode Island Education Data Reporting*. Retrieved from <http://infoworks.ride.ri.gov/school/frenchtown-school>

students and twenty-five (25) teachers. Eight percent (8%) of Eldredge students were eligible for subsidized lunch. One percent (1%) of students received ESL or bilingual services and fourteen percent (14%) received special education services.⁶

After elementary school, all students in town are zoned to attend Archie R. Cole Middle School (hereinafter “Cole Middle School”), which services all town students enrolled in public schools for Grades Six through Eight (6-8). Six hundred seventy-eight (678) students were enrolled in Cole Middle School in the 2016-17 School Year and the school employed fifty-five (55) teachers. Four percent (4%) of Cole Middle School students were eligible for subsidized lunch. One percent (1%) of students received ESL/bilingual services and ten percent (10%) of students received special education services.⁷

Upon completing Cole Middle School, all East Greenwich public school students attend East Greenwich High School (hereinafter the “High School”). Seven hundred fourteen (714) students attended the High School in 2016-17 and during that year, it employed seventy (70) teachers. Four percent (4%) of High School students were eligible for subsidized lunch. Less than one percent (>1%) of students received ESL/bilingual services and eight percent (8%) received special education services.⁸

⁶ Rhode Island Department of Education (2017). *InfoWorks! Rhode Island Education Data Reporting*. Retrieved from <http://infoworks.ride.ri.gov/school/james-h-eldredge-elementary-school>

⁷ Rhode Island Department of Education (2017). *InfoWorks! Rhode Island Education Data Reporting*. Retrieved from <http://infoworks.ride.ri.gov/school/archie-r-cole-middle-school>

⁸ Rhode Island Department of Education (2017). *InfoWorks! Rhode Island Education Data Reporting*. Retrieved from <http://infoworks.ride.ri.gov/school/east-greenwich-high-school>

II. EXECUTIVE SUMMARY

The East Greenwich School Committee hired the law firm of Henneous Carroll Lombardo, LLC (hereinafter “Firm”) to perform an educational audit of the District on May 29, 2018, in response to the Town of East Greenwich (hereinafter “Town”) failing to adequately fund the School Department’s budget for fiscal year 2019. As detailed in this report, the auditing team found that the failure of the Town to adequately fund the School Department has led to, and will continue to lead to, the deterioration of the quality public school system that the Town currently enjoys. A strong public school system is one of the primary attributes that young families look for when deciding where to live; contributing to higher property values and tax revenues. In particular, in marketing materials for East Greenwich, the strong academic reputation of the schools within the Town is often cited as a selling point for families.⁹ As demonstrated by data and observations throughout the education performance audit report, the District is not currently in compliance with the Rhode Island Department of Education’s (hereinafter “RIDE”) Basic Education Program (hereinafter “BEP”) and will be unable to maintain a strong public school system with high quality school buildings, strong academic programs and dedicated staff and faculty under its current funding structure.

⁹ See <http://www.rihousehunt.com/relocating-east-greenwich-ri/>; <https://www.neighborhoodscout.com/ri/east-greenwich>; https://www.google.com/search?q=move+to+east+greenwich+ri+for+the+public+schools&rlz=1C1OKWM_enUS787US787&oq=move+to+east+greenwich+ri+for+the+public+schools&aqs=chrome..69i57.6668j0j4&sourceid=chrome&ie=UTF-8

A. Educational Auditing Process

1. Purpose

The purpose of the audit is to identify the components of all educational infrastructures in grade levels PK-12, the program designs and their effectiveness, and the impact on student performance.

2. Question to be Answered

Does the district have enough staff, programs and/or resources to comply with state and federal law and the BEP?

3. Method of Collecting Data

In performing its educational audit, the Firm thoroughly examined each area of the District and its schools and administration. This was done through administrative and staff interviews at each of the six (6) District schools and Central Office, as well as review of data provided by the District, RIDE and the Special Education Census. The Firm then evaluated this information for its compliance with state and federal law. In addition, the Firm examined the District's compliance with the BEP. The BEP is the overarching set of regulations for the Rhode Island public education system. Section G-12-4 of the BEP states that "Each LEA shall ensure that its schools are compliant with the BEP..." Rhode Island Department of Education, *Basic Education Program*, Section G-12-4 (2009).

B. Organization of the Report

The Report is organized as follows:

- I. Introduction
- II. Executive Summary
- III. Review of Department Level Activities
- IV. Review of Instructional Programs
 - a. Elementary (PK-5)
 - b. Middle School
 - c. High School
 - d. Special Education Program
- V. Review of Personnel Contracts
- VI. Review of Information Technology
- VII. Review of Human Resources
- VIII. Review of Buildings and Grounds
- IX. Review of Athletic Programs
- X. Review of Finance
- XI. Budgetary Review
- XII. Conclusion

C. The Firm and Experts Who Conducted the Audit

Attorney Mary Ann Carroll coordinated this effort for the Firm. Attorney Carroll and her partners, Andrew Henneous and Aubrey Lombardo, run a boutique law firm which specializes in the areas of education and special education law. As such, they represent numerous school departments throughout Rhode Island and Massachusetts.

In addition to her expertise as an education law attorney, Attorney Carroll has over thirty (30) years of experience in the field of education. She has held positions ranging from classroom teacher, administrator and superintendent of schools.

The Firm, with the approval of Superintendent Victor Mercurio, also utilized experts in the areas of elementary education, secondary education, special education and fiscal oversight in the performance of its educational audit of the School Department. These expert educators spent over one hundred (100) hours speaking to personnel in the District and reviewing documents pertaining to East Greenwich Schools in the preparation of this report.

The Firm hired Patricia Dubois as its elementary education expert for the purposes of the educational performance audit. Ms. Dubois is presently the Superintendent of Glocester Public Schools. She has held that position since 2009 and during that time, Glocester Elementary Schools have consistently been ranked amongst the highest in the state based on standardized testing. Prior to holding her present position, she was the Director of Grants, Curriculum, Instruction and Assessments for the Woonsocket School Department. She has also held the position of High School Assistant Principal and Math teacher. Ms. Dubois conducted the audit of elementary schools within East Greenwich to determine if they are in compliance with the requirements of state and federal law and the BEP.

The Firm hired Dr. Thomas Kenworthy as the expert educator in the area of secondary education. Dr. Kenworthy is presently the Assistant Superintendent in the

Portsmouth Public Schools. He has held that position since 2014 and his main responsibilities in that position pertain to curriculum, assessment and instruction. Prior to holding that position, he was the Principal of North Kingstown High School, he worked for the Rhode Island Department of Education as a Leadership Fellow, and he was the Principal of North Cumberland Middle School. Based on this experience, he reviewed Cole Middle School and East Greenwich High School and assessed their compliance with state and federal law and the BEP. In addition, Dr. Kenworthy reviewed the East Greenwich Athletic Department based upon his experience as a football and softball coach.

The Firm hired Carol Brown, M. Ed., as its expert in the field of special education. Ms. Brown is presently the Director of Education at Mount Pleasant Academy, a regular and special education facility in Providence, RI. Prior to her retirement from public school education, she has held numerous positions throughout the state as Director of Special Education. She has served students in Westerly, East Greenwich, Exeter-West Greenwich, Coventry, Cranston, North Kingstown and South Kingstown. She has consulted in various Districts throughout the State of Rhode Island, including East Greenwich. She is widely regarded as one of the foremost special education experts in the state. She reviewed special education and related services in East Greenwich and assessed these programs for their compliance with state and federal law and the BEP.

The firm hired Mary King as its expert in the field of Finance. Ms. King is the Chief Operating Officer of the North Kingstown School Department. Her responsibilities include oversight of all operations of the District – Finance, Payroll, Purchasing, Employee Benefits, Human Resources, Food Service, Transportation and Facilities. Ms. King is a Certified Public Accountant with twenty-five (25) years of experience and she is an ASBO Certified School Finance Officer. Under her leadership, the North Kingstown School Department has been the recipient of the ASBO Meritorious Budget Award for excellence in budget presentation and transparency since 2016. Ms. King has worked in the municipal sector for eight (8) years; as Director of Administration for the East Providence School Department for two (2) years until moving to the North Kingstown School Department in 2012. Prior to entering the municipal sector, Ms. King held various positions in for profit and non-profit organizations. Ms. King reviewed the central office of the District, as well as all areas related to budget and finance for their compliance with state and federal law and the BEP.

D. Recommendations

Based on the review completed by the experts we make the following recommendations:

RECOMMENDATION	ASSOCIATED BEP PROVISION ¹⁰	ADDITIONAL COST
1. Human Resources (posting of vacancies, hiring/ discipline/ termination) and Transportation oversight functions should be assigned to appropriate department.	G-15-1.2 G-15-2.2	Assign to current HR Personnel; Transportation TBD
2. The administration of the District website should be the job duty of personnel in the IT Department.	G-15-1.2	Assign to IT staff once fully staffed
3. The posting of vacant teaching positions should be completed by personnel in Human Resources.	G-15-1.2 G-15-2.2	Assign to current HR personnel
4. Increase the hours of the Student Enrollment/ Strategic Support Mentoring Secretary to a FTE	G-15-2.1	\$33,000
5. Increase the number of social workers by 1 ½	G-14.3.2 National Association of Social Workers Guidelines	\$110,000
6. Increase the number of school psychologists by 1	G-14-3.2	\$75,000
7. Hire a Director of Learning to oversee all aspects of the curriculum and develop a	G-13-1 <i>et als</i>	N/A

¹⁰ These citations are intended to be for reference / example purposes and are not intended to be all inclusive.

comprehensive, District-wide, written curriculum ¹¹		
<p>8. In the areas of Curriculum and Instruction, develop a budget in order to:</p> <ul style="list-style-type: none"> • Provide a consistent curriculum across all grade levels; • Provide time and funding for weekly common planning time; • Provide time and funding for PK-12 articulation; • Provide a budget for professional development; • Hire instructional coaches to assist with job embedded professional development • Provide the resources for a new ELA program • Purchase science kits for all K-2 classrooms 	<p>G-12-4.2</p> <p>G-13-1 <i>et als</i></p>	\$275,000
<p>9. The District must develop a technology/materials plan in which students are uniformly provided materials within their grade levels.</p>	<p>G-12-4.2</p> <p>G-13-2.2</p>	TBD
<p>10. The District should review its staffing and intervention procedures at the middle school level to ensure that the student intervention process is in full compliance with the BEP and hire an additional Reading Specialist as necessary.</p>	<p>G-14-1.1</p>	\$75,000

¹¹ It is our understanding that since this audit was commissioned this position has been filled

<p>11. The District should review its staffing and intervention procedures at the high school level to ensure that the student intervention process is in full compliance with the BEP and hire an additional Reading Specialist as necessary.</p>	<p>G-14-1.1</p>	<p>\$75,000</p>
<p>12. The District must reinstate a Library-Media Specialist at the High School in order to be in full compliance with the BEP and should not attempt to cut that position due to budgetary constraints in the future.¹²</p>	<p>G-13-1.3.11</p>	<p>N/A</p>
<p>13. Increase the position of Preschool Coordinator from part-time to full-time.</p>	<p>G-13-2</p>	<p>\$50,000</p>
<p>14. Increase the number of paraprofessionals in the Preschool program so there are always two in a classroom.</p>	<p>G-13-2</p>	<p>\$55,000</p>
<p>15. Review/replace the current playground surface at Meadowbrook for accessibility; review/replace equipment to be in compliance with the Americans with Disabilities Act.</p>	<p>ADA G-14-1</p>	<p>\$25,000</p>
<p>16. Re-visit the five-year plan for expansion of the LifeSkills Program space</p>	<p>ADA § 300.43 of the Rhode Island Board of Education Regulations Governing the Education of</p>	<p>TBD</p>

¹² There is a full-time library/media position in the budget for next school year.

	Children with Disabilities	
17. Install a handicapped accessible bathroom within the Life Skills wing at the High School	ADA, 42 U.S.C. § 12101 G-14-1	\$25,000
18. Vacant IT positions should be filled. Review and increase IT staffing.	G-15-2.1	\$80,000
19. School Department must be given access to, and trained on, all Munis modules.	G-15-2.1	\$5,000
20. Develop a budget to update and repair computers and technology within the schools.	G-15-2.1	\$100,000
21. Purchase iPads, MacBooks and associated apps for special education	G-15-2.1	\$3,000
22. Purchase a color copier for the Life Skills program	G-15-2.1	\$4,000
23. Develop and fund an updated five-year technology plan; conducting an assessment of needs and establishing a consistent and reliable funding source.	G-15-2.1	TBD
24. Add full-time position in Human Resources	G-15-2.2	\$55,000
25. Job descriptions should be reviewed and updated by HR.	G-15-2.2	TBD
26. Duties relative to the school lunch program should be reassigned from HR to appropriate personnel.	G-15-2.2	TBD
27. Add administrative support employee for the Director of Facilities.	G-14-4 G-15-2.4	\$55,000
28. Review and increase custodial staffing.	G-14-4	\$90,000

	G-15-2.4	
29. Conduct a thorough review of all maintenance and safety issues within the schools and develop a plan and budget for repairs.	G-14-4 G-15-2.4	TBD
30. Update exterior safety access at the High School. ¹³	G-14-4 G-15-2.4	N/A
31. Install adequate camera access for administrators at the High School. ¹⁴	G-14-4 G-15-2.4	N/A
32. Formulate a full capital upgrade funding plan based on the Jacobs Engineering Facilities Condition Analysis.	G-14-4 G-15-2.4	TBD
33. The District should commission a detailed enrollment projection analysis using current data points including, but not limited to, current enrollment by age, grade, demographic information relative to births and school aged children as well as housing data for new developments/sales history, in order to provide the District with an accurate planning tool for future school needs.	G-14-4 G-15-2.4	TBD
34. The District is encouraged to review its overall budget for high school athletic programs to ensure they are financially supported at an adequate level and do not place an undue	G-14-2.2 G-14-3.4	TBD

¹³ It is our understanding that the Town of East Greenwich has provided some funding to the District to address some of the safety issues

¹⁴ It is our understanding that the Town of East Greenwich has provided some funding to the District to address some of the safety issues.

burden on parent groups, made up of parents who are already paying taxes to support the school district, to fund for essential needs.		
35. The District should replace the field turf at the Athletic Complex for safety reasons.	G-14-2.2 G-14-3.4	TBD as part of overall facilities capital needs
36. The District should begin charging outside entities for usage of its athletic facilities.	N/A	TBD revenue stream
37. The allocation of staff and duties between the District and the Town amongst personnel in the Finance Department be reviewed in order to ensure that the School Department's Finance Office has adequate staffing to meet the guidelines set forth in the BEP. Add staff to perform School Department functions as necessary.	G-15-2.3 <i>et als</i>	TBD
38. Undertake a full Munis investment analysis with Tyler Technologies.	G-15-2	\$7,000
39. The School Department and Town hire a joint part-time Purchasing Agent in the Finance Office.	G-15-2.3.1	\$25,000
40. The School Department should formulate a "Use of Fund Balance Policy" that identifies an amount of money to be held in emergency reserve and addresses use beyond emergency level threshold.		N/A

East Greenwich presently enjoys a well-deserved reputation as one of the highest achieving school districts in the state. Our audit showed that test scores are high and student achievement is high in comparison to other similarly situated districts. The staffing in the District, from the superintendent to all other personnel is made up of well-qualified, knowledgeable and hard-working people.

This being said, based on the results of our audit, it is unlikely that the District will be able to continue to maintain its high quality school department and reputation if there is not a significant change in the funding of schools in the Town. Our auditors determined that the District is currently not in compliance with the law and the BEP in several areas. The most alarming and pervasive theme present in all of the experts' reports was the lack of district wide programs, processes and long-term planning.

Through the last several years, the enrollment in the District has grown, while its budget has stayed largely stagnant. The effects of this have been felt from the Central Office down to each individual school, and even the athletic program. The lack of long-term planning appears to initially stem from budget issues which have resulted in a shortage of personnel in key position and the inability to budget and forecast for the future. This is particularly apparent with respect to Curriculum. A central part of the BEP revolves around the mandate for each LEA to have an articulated districtwide curriculum and professional development surrounding that curriculum. East Greenwich currently has no articulated districtwide curriculum and a minimal budget for any professional development surrounding curriculum. While the hiring of a

Curriculum Director is certainly a step in the right direction in terms of compliance with this portion of the BEP, it is essential that this position be provided with the personnel and resources required for implementation of districtwide curriculum and professional development. It is also essential that students and teachers be given the necessary materials associated with the curriculum, which in many cases, they do not presently have.

Another area which has felt the effects of the lack of resources and the inability to plan long-term, is facilities. Currently, the majority of schools in East Greenwich are overcapacity; two being over capacity by fifty percent (50%). Projections shows that the student enrollment in the schools will only continue to increase in the next several years. Based on these projections, the District will literally have no place to put students in a short period of time. Unfortunately, there has been no long-term planning around this issue. In addition, the principals in all buildings complained of disrepair and maintenance issues which have not been addressed and are potential safety hazards. Funding needs to immediately be directed toward repairs, the hiring of personnel to attend to those repairs and a full capital building upgrade plan. In fact, the lack of a full capital upgrade plan could cause the District to lose out on much needed state funding, which is discussed further in the report.

Technology is another area in which budgetary restraints have caused the district to be both understaffed and out of compliance with both the Individual with Disabilities Education Act (IDEA) and the BEP. The lack of appropriate staffing and

support in the IT Department has likely led to numerous IEP violations which occur when a device which is required as a student accommodation in a 504 plan or an IEP is not available or is not repaired in a timely manner. Further, teachers and staff do not have access to the technology needed to run applications that special education students need. This could have significant liability and financial implications for the District in both the long and short-term.

Another recurring area of concern raised by each auditor was with respect to the ability of the District to meet the social-emotional needs of students. The District is understaffed with respect to social workers and school psychologists in comparison to other similarly situated districts around the state. Each auditor expressed that based on their professional experience, the District was understaffed in many areas, and at current staffing levels would be unable to meet the minimum requirements of the BEP in several areas. Accordingly, they determined that there was no room for further positions to be eliminated from the budget and that any further cuts would be devastating to the district. During the 2016-17 School Year, the position of Librarian at the High School was cut. If that were to happen again, it would be a direct violation of Section G-13-1.3.11 BEP and would put the District's accreditation in jeopardy. In addition, there was some discussion around eliminating a school nurse position, which would, again, be a violation of Section G-14-3.1 of the BEP, and therefore, should not be a viable option for the District.

It is apparent that the District has prioritized short-term needs over long-term planning, through no fault of the school administration, but as a result of the Town's refusal to adequately fund its largest asset- the School District. Unfortunately, the District needs an infusion of capital to support programming and long-term planning if it wishes to continue to be a high quality public school district. This audit has determined that approximately **one million, two hundred, and twenty-two thousand (\$1,222,000)** is needed in order to meet the BEP this year. If these resources are not put into the areas identified in this report, it is the opinion of the auditors that the District will fall further out of compliance with the BEP and the quality of instruction, ability to recruit and maintain staff and overall educational experience in East Greenwich will undoubtedly deteriorate.

III. REVIEW OF DEPARTMENT LEVEL ACTIVITIES

The BEP places a strong emphasis on the role of central administration in the success of a school department and its compliance with the BEP. It explicitly states in Section G-12-4.1 that in order "to carry out its primary responsibility, each LEA requires able, informed leadership and management at all levels of its system...that can guide, motivate, and support implementation of the BEP." Section G-15-1.2 of the BEP requires that all school departments employ a chief executive "who is responsible for the leadership, management, operation, and accountability of the LEA" and who "shall provide the vision and educational leadership for creating a high performing education system that is focused on student learning and development." It further requires that

the chief executive “shall assign administrative and supervisory personnel, including building level leadership to assist in the effective management of the LEA.”

Under the aforementioned section of the BEP, the chief executive and his delegates are responsible for (1) effectively accomplishing system wide planning and evaluation; (2) establishing an academic organization within the LEA in order to ensure continuous improvement of learning and teaching; (3) overseeing a comprehensive information system of data collection, analysis and reporting, including relevant achievement criteria and measurement sufficient to inform the LEA about its progress in improving student learning; (4) overseeing administration of the personnel function consistent with personnel standards, policies, and the table of organization established by the governing board that includes: policies and procedures for recruiting, supporting and retaining highly effective staff; ongoing supports to improve the effectiveness of staff; cohesive professional development; and evaluation of personnel performance; (5) overseeing the development and adoption of a responsible budget with spending priorities that reflect the LEA strategic plan and that is focused on student learning and continuous improvement; (6) overseeing the administration of an operational and maintenance program that will ensure that all educational facilities and transportation programs are efficiently operated, properly maintained, and in a safe condition for students, staff, and the community and (7) leading the development and implementation of a comprehensive system of communication that ensures that all district staff, parents, guardians, and the community at large are fully informed

regarding the goals, programs, opportunities, achievements, and needs of the education system.

The District's present Central Administrative Office consists of the Superintendent's Office, Student Services, Fiscal Office/HR, Facilities and Technology. The latter three departments will be addressed in Section VIII and X of this report. The Superintendent's Office employs (1) the Superintendent, (2) an Administrative Assistant to the Superintendent and the School Committee, (3) the Director of Teaching and Learning and (4) a Central Office Secretary. The Office of Student Services employs (1) the Director of Student Services, (2) an Administrative Assistant to the Director; (3) Student Services Clerk; and (4) a part-time Student Enrollment/District Mentoring Secretary.

The roles and responsibilities of each member of the Central Administration Office were thoroughly reviewed as part of the educational performance audit. The auditors found that the staff currently employed by the School Department, while dedicated, hard-working and committed to their jobs, is not currently adequate to fulfill the requirements of the chief executive officer and his designees pursuant to Section G-15-1.2 of the BEP. Specifically, there is currently not adequate staffing in the Finance and Human Resources Offices in order to run a strong, effective school department in compliance with the BEP.

The lack of adequate staffing of most of the Central Office functions has led to a disconnected set of job duties and organizational structure within the District. The job

descriptions that were reviewed by the auditors are out of date and many job duties/responsibilities are assigned haphazardly out of the necessity of needing to get work done; contributing to an inefficient system that does not flow well in terms of workload and output. Further, increased turnover leading to the loss of institutional knowledge and vacant positions in key areas, have contributed to this poorly structured system that is in need of increased staffing and workflow analysis.

A review of job descriptions and communications with Central Office staffing reveal the following weaknesses or restricting needs within the District by job function or department function, which restrict the district from meeting the standard set forth for the Central Office within the BEP:

(A) Superintendent's Office

1. The Superintendent

All the educational experts were highly complimentary of the job that the superintendent manages to do in the District, with limited staffing. They found him highly competent and effective. This being said, he is often forced to perform job responsibilities that should be delegated to others. This is the effect of the District being understaffed in several areas, as will be discussed further in the report. One of these areas is with respect to human resources duties, such as the oversight of hiring, progressive discipline and termination, which is further discussed in Section VI of the report.

The superintendent is also responsible for oversight of the outsourced transportation function. While the current vendor is deemed a trusted and reliable partner for the School Department; oversight of routes, parent issues relative to busing and other fiscally related issues should be assigned to someone other than the Superintendent of Schools. While a full-time employee may not be necessary since the function is outsourced, there does need to be a responsible employee within the District tasked with oversight and reporting of this function to ensure that the District receives competitive pricing and adequate services based on agreed upon contractual language. The Superintendent of Schools should not be tasked with this duty and as such, indicates a lack of appropriate staffing for the District. It also takes away from important duties of the chief executive of the School Department as required by Section G-15-1.2.

Recommendation: Human Resource and Transportation oversight functions should be assigned to appropriate departments.

2. The Confidential Administrative Assistant to the Superintendent

The Confidential Administrative Assistant to the Superintendent performs numerous additional duties outside of her job description, taking away from her time to perform the duties needed to support the Superintendent. This position is required to perform duties that should be within the Information Technology Department, specifically administration of the District website(s). While it is commendable that this position has assumed this function, the responsibilities of these duties belong within the Information Technology Department. Previously, website administration was the

responsibility of a Media Specialist within the District. While certain departments should be able and required to keep their department websites current, the overall administration of this function should be housed in the Information Technology Department, which has the expertise, technical and ethical training to perform these functions. This function has been assigned to the Superintendent's Confidential Assistant due to the lack of adequate staffing and the retention of technology support staff, which currently has two (2) of three (3) positions vacant, one of which is the position of Director of Technology.

Recommendation: The administration of the website should be done by technology staff.

In addition, this position performs human resources duties in the summer, relative to the posting of vacant teaching positions within the District. Because the human resources function is largely consolidated with the Town, these duties belong within the scheme of that department for continuity of processes and consistency of responsibilities. Section G-15-2.2 of the BEP requires all school department to maintain a human capital management system. Therefore, it is appropriate the management of District jobs should be done within the confines of a well-functioning HR department to ensure all legalities relative to staff and faculty hiring are appropriately administered.

Recommendation: The posting of vacant teaching positions should be completed by personnel in Human Resources.

(B) Student Services

1. *Student Enrollment/Strategic Support Mentoring Secretary*

While this department was reviewed with an eye toward special education requirements, which will be addressed in Section IV (e), one position recommended for increased staffing is in the area of student enrollment/registration and RIDE data reporting requirements.

Section G-15-2.1 of the BEP requires each School District to utilize a “comprehensive, integrated information system,” which it defines as “essential to the creation and support of a 21st century learning environment.” The BEP states that

the LEA shall provide data and reports as are required by federal or state law and Board of Regents regulations or as are necessary for ensuring all aspects of accountability. These data and information shall provide the basis for meaningful comparisons of data by the LEA. These data and information will also provide the basis for the information required to set policies, align resources, and ensure equality of educational opportunities. The LEA shall provide appropriate access to its information systems and shall utilize all state and federal data systems necessary to implement its information system.

The current Student Enrollment/Strategic Support Mentoring Program Secretary is a part time, seventeen and a half (17.5) hour per week position. This position is responsible for the RIDE reporting requirements outlined in the BEP, as well as new student enrollment, special education census and Medicaid reporting. In addition, this position is responsible for administrative support of the mentoring program and administration of ASPEN data. The duties of this position are unlikely to be completed effectively and timely in a part-time position. While the current employee is dedicated and hard-working, the myriad of duties assigned to this position are, at best, unrealistic.

Because Medicaid and Census reporting are complicated, time consuming and critical tasks, important for the reporting and receipt of federal funding for eligible Medicaid recipients, these duties alone are difficult to maintain with a part-time employee. The addition of new student enrollment and RIDE reporting requirements and deadlines make these job duties most appropriate for a full-time position.

The lack of adequate staffing in this area, has potentially led to the loss of revenue by the District. In the past several years, there have been significant fluctuations in Medicaid reimbursements due to lack of staffing for input and follow up. While the reimbursement process is outsourced as in most Districts, administrative input and tracking is critical to timely reporting and collections. The information into the system must be accurate and complete in order for the District to receive allowed reimbursements. Additionally, the extensive data reporting requirements by RIDE attendance for students and staff, Census counts, and other data requirements require accurate reporting to ensure RI State Aid to Education is reliable and current. If this data is not input correctly and in a timely manner, the District could miss out on funding state funds.

Finally, this position is also required to administrate new student enrollment, verifications of residency and follow up of residency issues. These are all unique and time-consuming job responsibilities. This is particularly important because, in a Town like East Greenwich, which currently has a highly ranked school system, and is surrounded closely by numerous other towns, a lack of adequate staff to follow up on

residency matters may lead to East Greenwich tax payers supporting students in the District who are not residents of the Town.

Recommendation: This position be made a full-time equivalent position estimated at an additional \$26,000 for full year. This estimate includes an assumption for individual health and dental benefits. Family plan coverage would add an additional estimated \$7,000 more per year.

2. Administrative Assistant to the Director of Teaching and Learning:

The job description for this position appears reasonable and appropriate but should be reviewed once the new Director of Teaching and Learning has had time in her current position to effectively analyze the functions of this administrative position.

In summary, the Central Office functions of the District should be reviewed for added staffing and reallocation of duties in order to ensure compliance with the BEP. Any organization is only as strong as the Central Office staff supporting the operations of the organization. While all employees communicated with are dedicated to their positions, their lack of support will more than likely lead to continued turnover and loss of institutional knowledge that is important to organizations and essential to compliance with the BEP. The level of turnover in the past three years is evidence enough that the Central Office functions of the District need review and financial support in order to ensure compliance.

IV. REVIEW OF INSTRUCTIONAL PROGRAMS

Section G-12-4.2 identifies one of the seven “Functions of the Local Education Agency” as providing access to rigorous, guaranteed, and viable curricula for all

students; ensuring differentiated instructional strategies, materials, and assessments; and building systems that provide opportunities for common planning and assessment.

Section G-13-1.1 of the BEP addresses the “Framework for a Comprehensive Curriculum.” It specifically states

The Board of Regents for Elementary and Secondary Education charges each LEA to ensure that its students are provided with a comprehensive program of study that is guaranteed and viable in each content area from pre-kindergarten through grade 12 (PK-12) so that its students are prepared for post-secondary education or productive employment. Each curriculum shall be developed to meet or exceed state content standards that have been adopted by the Board of Regents. In the absence of state-adopted standards in a content area, each LEA shall align its curriculum to national content standards specific to that content area. Each LEA shall formally adopt a set of curriculum documents that specify the content standards, instructional practices, materials, program, texts and assessments, and grading practices that are based on the community’s rigorous achievement descriptions for its students and that account for the expectation that students must be globally aware and internationally competitive.

Section G-13-1.2 of the BEP requires that each LEA have “sufficient personnel, resources, and time to design and implement an aligned curriculum, instruction, and assessment system.” It further mandates that the curriculum be “written” and disseminated to the professional staff and community and that the LEA provide “sufficient professional development to all staff to ensure curriculum implementation with fidelity.”

In addition, Section G-13-1.3 of the BEP requires that each school district “shall provide a comprehensive program of study in English language arts, mathematics, social studies, the sciences, visual arts & design and the performing arts, engineering and technology, comprehensive health, and world languages throughout the PK -12 system.” *Id.* at G-13-1.3.

With respect to English Language Arts, Section G-13-1.3.1 of the BEP requires, in pertinent part that each LEA shall:

1. Establish an English language arts curriculum that is aligned instructionally with the local and state standards....In addition, each LEA shall maintain congruence among and across the curriculum, instruction, and assessment.
2. Develop a coordinated and integrated K-12 English language arts curriculum that addresses the content clusters within local and state reading and written and oral communication standards (GLEs and GSEs), includes contemporary texts, and encourages students to be active participants within the community.

With respect to Mathematics, Section G-13-1.3.2 of the BEP requires each LEA to ensure that the coherent and coordinated K-12 mathematics curriculum addresses:

1. Research-based approaches to developing mathematics skills;
2. Learning activities that emphasize mathematical communication and reasoning skills and incorporate mathematical tools and technology;
3. The use of manipulatives during the acquisition of skills and conceptual understanding; and,
4. Applied learning activities that demonstrate the use of mathematics in daily life.

With respect to Social Studies, Section G-13-1.3.3 of the BEP requires each LEA to ensure that the coherent and coordinated K-12 curriculum for social studies includes coursework designed to develop:

1. Student knowledge, skills, and attitudes as indicated in the GSEs for Civics & Government and Historical Perspectives/Rhode Island History;
2. Student understanding of how the world operates in this interconnected era through geography, political science, and economics; and,
3. Student understanding of human behaviors, beliefs, ideologies, cultures, and backgrounds through history, sociology, anthropology, and other related social sciences.

With respect to Science, Section G-13-1.3.4 of the BEP requires each LEA to ensure that “the coherent and coordinated K-12 curriculum for science includes an inquiry-based approach that devotes a sufficient amount of instructional time to learning experiences that ensure all students develop and demonstrate applied learning skills appropriate to the content area and grade level.”

With respect to Dance, Music, Theater and Visual Arts & Design, Section G-13-1.3.5 of the BEP requires each LEA to ensure that the coherent K-12 curricula for the arts include:

1. Artistic Process: Creative problem solving using the tools, techniques, and technology of one or more art forms in order to make the imagined tangible;
2. Cultural Context: Purpose and motivation fundamental to art-making for all societies; and integration of arts history, analysis, and criticism;
3. Communication: Personal expression, creativity, and meaning through the use of symbols representative of each art form; and sharing of the human experience with image, sound, movement, words, space, time, and/or sequence; and
4. Aesthetic Judgment: Applying knowledge in order to reflect on and evaluate the work of self and others.

With respect to Engineering and Technology, Section G-13-1.3.6 of the BEP requires each LEA to ensure that the coherent and coordinated K-12 curriculum for engineering and technology includes:

1. An inquiry based approach that promotes hands-on learning, including problem based and design based learning;
2. Opportunities for students to make connections among a variety of technologies;
- and 3. Integration of the GSEs, rather than focusing on individual standards in isolation.

With respect to World Languages, Section G-13-1.3.7 of the BEP requires that each LEA shall provide:

1. Coursework in a minimum of two languages other than English at the secondary level and offerings of at least three consecutive years of the two selected languages;
2. A planned program of study including coursework in the development of listening, speaking, reading, and writing along with the cultural background associated with each taught language;
- and 3. A program of study that includes connections to real-world applications.

Sections G-13-1.3.9 and G-13-1.3.10 of the BEP require each LEA to provide a comprehensive Health curriculum for grades K-12 and a coherent and coordinated Physical Education curriculum for Grades K-12. Section G-13-1.3.11 of the BEP provides guidelines for an effective LEA library-media program, which assists all students in becoming active and creative locators, evaluators, and users of information to solve problems and to satisfy their own curiosity.

Finally, Section G-13-2.1 of the BEP requires each LEA to “implement a set of coherent, organized instructional strategies designed to ensure positive improvements in student learning...based on current research and adjusted according to student progress monitoring and assessment data.” And Section G-13-2.2 of the BEP requires each LEA to “provide the necessary programs, texts, and materials that ensure that students are supported fully in acquiring the knowledge and skills specified in a comprehensive program of study.”

The BEP further addresses students' accessibility to instructional programs by creating standards regarding barriers to students' abilities to learn. Section G-14-3.2 requires districts to provide psychological and mental health services to students. In pertinent part, this Section requires LEAs to "Ensure that school psychological and mental health services will be provided by appropriately credentialed, high quality staff." Section G-14-1.1 of the BEP provides that LEAs must "provide student centered, data-driven supports and interventions utilizing a problem-solving process, building on the foundation of a guaranteed and viable comprehensive program of study.

A. Elementary (PreK - 5)

1. Overview

The East Greenwich School District has four (4) elementary schools: James H. Eldredge School, George R. Hanaford School, Frenchtown School and Meadowbrook Farms School. All elementary schools have one (1) fulltime principal, a secretary and a nurse.

2. Staffing

The staffing for grade level classes at the four (4) elementary schools is within the guidelines of the East Greenwich Teachers' Union Collective Bargaining Agreement. The Social Workers and School Psychologists employed by the District are shared amongst the schools and total one and a half (1.5) School Social Workers to support the

entire PK-12 population, as well as four (4) School Psychologists to support the entire PK-12 population.¹⁵

Although the staffing for grade level classes is adequate and in line with comparable districts, there is an extreme dearth of Social Workers and School Psychologists in comparison to comparable districts within the State of RI.

District/Population Comparison	East Greenwich 2500	Portsmouth 2450	Smithfield 2395	Westerly 2790
Psychologists	4.0	2.5	5.5	4.0
Social Workers	2.0 (.5 of one of these positions is to oversee the Mentoring Programing leaving EG with 1.5 SW to support all other work with PK-12 population	3.0	3.0	7.7

This comparison, along with the testimony of the principals of each elementary school, is direct evidence that the District is not in compliance with Section G-14-3.2 of the BEP. The District does not currently employ enough appropriately credentialed, high quality staff to provide adequate mental health services to elementary school students within the District.

¹⁵ Social worker and School Psychologist staffing is addressed further in Section IV (e).

The principals at each elementary school in the District reported that there is a lack of support for the behavioral and social/emotional well-being of their students. Each administrator has been forced under the current staffing structure to spend time providing the services and support that should be provided by a School Psychologist and/or social worker, because of the lack of staff. In addition, the forced sharing of school psychologists and social workers amongst the six (6) schools within the District often leads to appropriate personnel not being available to deal with immediate mental health/behavioral/social-emotional needs of students. In addition to administrators not qualifying as “appropriately credentialed” staff to adequately handle the mental health and social-emotional needs of students in direct violation of the BEP, the necessary work to help students by administrators is extremely time consuming. While the administrators call to action with respect to the emotional well-being of students is commendable, administrators reported that currently they may have to spend up to three (3) hours in one (1) day handling students’ social emotional needs. When these situations happen repeatedly, it takes away from the time the principal should be in classrooms, supporting teachers, and working on instruction and assessment pursuant to their own duties under the BEP.

Recommendation: In order to be in compliance with Chapter 14 of the BEP, as evidenced by staffing in comparable districts, the District needs to increase the number of school psychologists and social workers district-wide.

3. Curriculum

Currently, throughout the elementary schools in the District, there is no “set of coherent, organized instructional strategies designed to ensure positive improvements

in student learning...based on current research and adjusted according to student progress monitoring and assessment data.” Further, the necessary materials are not made available District-wide to “ensure that students are supported fully in acquiring the knowledge and skills specified in a comprehensive program of study.” These deficiencies are a direct violation of Sections G-12-4.2 (c), G-13-2.1 and G-13-2.2 of the BEP.

In addition, the District does not have a “comprehensive set of district-wide policies that will guide the development, alignment, and implementation of curriculum, instruction, and assessment systems to ensure that all students become proficient life-long learners” in violation of Section G-13-1.2 of the BEP. It also does not have written curriculum, nor does it provide District-wide professional development with respect to curriculum, in further violation of Section G-13-1.2 of the BEP.

The lack of a comprehensive District-wide curriculum creates an additional burden on the administrator of each school, where each individual principal is forced to plan and provide professional development to their staff around curriculum. Elementary school principals indicated that they act as the curriculum director at their schools approximately thirty (30%) to forty (40%) percent of the time. As reported by the principals at each elementary school, the time required to provide this instruction around curriculum takes away from the duties that are required of them as an administrator. For example, as a part of a principal’s job duties and responsibilities, they should be able to lead grade level common planning time across grade levels as the Head Instructional Coach of their schools. However, District principals reported that

instead of being able to be a participant in common planning time with teachers, they are acting first, as a Curriculum Director by planning the agenda and then are forced to act as a classroom teacher by teaching character education three times a week in order to provide teachers in their schools with common planning time.

Further, District principals, admittedly do not have the appropriate training to plan curriculum, and that curriculum is not uniform throughout the District, as required by the BEP.

With respect to specific subject areas, there is no consistent and rigorous English Language Arts curriculum across the District's elementary schools. Grades PK - 2 use targeted trade books for whole class teaching tied to their SORICO units with various leveled libraries to continue focused skillwork in guided reading groups. Phonics, handwriting and spelling are taught through Wilson FUNdations for Kindergarten through Grade Two (2). All process pieces are scored on grade level rubrics which were modified from the work of Lucy Caulkins. There is also daily on in all classrooms in the form of journals or sentence work with a focus on specific skills, grammar and conventions.

For Grades 3 - 5, the ELA units were developed years ago and do not have the rigor required now by the BEP. The units are outdated and are no longer being followed with fidelity. There is no common ELA curriculum for Grades 3 - 5. The lack of a Districtwide curriculum with corresponding professional development in an area as important as ELA is a glaring violation of Section G-13-1.3.1 of the BEP. It is also a violation of Section G-13-1.1, which requires written Curriculum documents.

The District elementary schools are currently using Envisions Mathematics. The scope and sequence provided by Envisions Math is being followed, but there is no written curriculum or, ongoing professional development or K - 5 articulation across the schools. This is a violation of Section G-13-1.3.2 of the BEP requires each LEA to provide students with a “coherent and coordinated K-12 mathematics curriculum.” It is also a violation of Section G-13-1.1, which requires written Curriculum documents.

With respect to Social Studies, there is currently no written curriculum at the elementary level. In fact, for PK- Grade Two (2), there is little to no time devoted to Social Studies. This is a violation of Section G-13-1.3.3 of the BEP, which requires each LEA to provide a coherent and coordinated K-12 curriculum for Social Studies. In addition, it is a violation of Section G-13-2.1 and Section G-13-1.1, which requires written Curriculum documents.

With respect to Science, Kindergarten through Grade 2 are kit-based, but not all classes have kits presently. This is a violation of Section G-13-1.3.4 of the BEP which requires each LEA to provide a curriculum which ensures that “all students develop and demonstrate applied learning skills appropriate to the content area and grade level.” It is a further violation of Section G-13-2.2 of the BEP which requires that each LEA shall “provide the necessary programs, texts, and materials that ensure that students are supported fully in acquiring the knowledge and skills specified in a comprehensive program.” Because the curriculum is kit-based, and classes do not have kits, there is not an opportunity for all students to demonstrate applied learning skills, nor do all students have the necessary materials. Finally, while the scope and sequence

from the kits is being followed in classrooms where kits are available, there is no written curriculum, professional development or articulation between the schools in violation of Section G-13-2.1 and Section G-13-1.1 of the BEP. Grades Three (3) through Five (5) use STEMScopes for their Science curriculum, which is aligned with the Next Generation Science Standards (NGSS).

Recommendation: In order to be in compliance with the BEP, the District needs a full-time Assistant Superintendent or Curriculum Director, at a minimum, in order to provide the District with a current, written, uniform curriculum in all subjects; a consistent curriculum template; access to essential questions and common assessments; PK - 12 articulation and the professional development needed for all of these components.

Provide the necessary number of science kits so that all K-2 classrooms have the use of science kits

The auditors were particularly alarmed by the lack of a District wide ELA curriculum, which should be the first priority of a Curriculum Director.

Recommendation: Additionally, it is recommended that the staff at each school receive several hours of professional development work throughout each school year, including job-embedded professional development. In order to comply with the BEP, the District must develop a centralized approach to professional development, as opposed to the current haphazard and disorganized structure, in order for all staff to have a mutual understanding of the core content and the expected student performance. At present, there is not enough staff at central administration or time for teachers to be involved with intensive professional development in order to be in compliance with the BEP. Therefore, it is recommended that the District hire at least two (2) Instructional Coaches who work directly with the Assistant Superintendent or Curriculum Director.

In addition to the lack of a written, centralized curriculum for elementary level schools, currently the four elementary schools have varied amounts of Chromebooks, iPads, Science kits and other technology and supplies. Section G-12-4.2 of the BEP mandates that the District “require, finance, and support differentiated instructional strategies, materials, and assessments to ensure that all students have opportunities to

state and district performance standards.” Further, Section G-13-2.2 of the BEP requires the District to “provide the necessary programs, texts, and materials that ensure that students are supported fully in acquiring the knowledge and skills specified in a comprehensive program.” In essence, in order to comply with the BEP, resources for all students needs to be equitable. Accordingly, the varied resources at each elementary school for different students is in violation of the BEP due to the inequity of resources amongst elementary school students.

Recommendation: The District must develop a technology/materials plan in which students are uniformly provided materials within their grade levels.

B. Middle School (6-8)

1. Overview

Archie Cole Middle School is the Town’s sole middle school for students in grades six (6), seven (7), and eight (8). The current building opened in the Fall of 2011 and is the Town’s newest school facility. The Middle School consistently ranks as one of the top performing middle schools in the state of RI and was named a National Blue Ribbon School in 2015.

2. Staffing

The School is led by a Principal, who returned to the school this year after a fellowship with the Rhode Island Department of Education, and an Assistant Principal who serves in a dual instructional support and student management role.

In the 2016-17 School year, the Middle School employed (55) fifty-five teachers. Prior to 2015, teachers taught four (4) instructional periods. However, due to a labor arbitration decision in 2015, teachers' schedules had to be revised so that each teacher at the Middle School now instructs five (5) periods. This resulted in a loss of teacher common planning time during the school day and less time for teachers to discuss student intervention needs and supports. Beginning in the 2017-18 School Year, the District implemented an early release each Wednesday so that state mandates around common planning time for teachers could be met. Despite these challenges, with the addition of the Wednesday CPT, the Principal reports that overall teacher staffing levels are at an adequate level to meet student instructional needs. However, the Principal feels strongly that the Middle School would not be able to absorb any additional cuts in teacher staffing without seriously impacting curricular offerings.

In addition to administration and teachers, the Middle School employs two (2) Guidance Counselors, one (1) Nurse, and a part-time Psychologist and Social Worker to provide counseling and social and emotional support for students. As was previously iterated in the *Elementary School* section of the report, the staffing of Psychologists and Social Workers, both in the Middle School and throughout the District is lacking in comparison to other comparable districts. The Principal of the Middle School considers the level of support for psychological and mental health services to be less than adequate to meet student needs related to social-emotional learning. She expressed that other budget priorities have prevented her from being able to add to these staffing levels. Based on the current staffing structure in comparison with other comparable

districts, and the testimony of the Principal, it is apparent that the Middle School is not in compliance with Chapter 14 of the BEP, as it does not currently employ an adequate number of appropriately credentialed, high quality staff to provide mental and social emotional support to its students.

Recommendation: In order to be in compliance with Chapter 14 of the BEP as evidenced by staffing in comparable districts, the District needs to increase the number of school psychologists and social workers district-wide.

The Middle School also employs one (1) full-time Library Media Specialist who supports teachers and students through classes that are brought in for research and projects.

There is one (1) Reading Specialist to provide intervention support for students but the schedule is not conducive to providing those supports outside of core instructional time. The inability of reading specialists to provide intervention supports outside of core instructional time makes it extremely unlikely that the Middle School is in compliance with Section G-14-1.1 of the BEP. This section requires that the District provide supports and interventions through a process that is “systematic and focused at the individual student level in order to provide access to supports and interventions that may be necessary at the classroom, school, and district levels designed to enable that student to achieve academic success.”

Recommendation: The District should review its staffing and intervention procedures at the middle school level to ensure that the student intervention process is in full compliance with the BEP and hire an additional Reading Specialist as necessary.

3. *Curriculum*

There are two teams per grade at the Middle School, made up of core content area teachers in Math, Science, Social Studies and ELA. Each team has a special educator and at least one paraprofessional attached. Students have an adequate offering of electives in art, music, and tech education, and exposure to a World Language program starting in Grade Six in accordance with the BEP. Beginning in Grade Seven (7), students select from either Spanish, French, or Latin which they take for two (2) years and are able to receive high school credit upon successful completion.

There is currently no “set of coherent, organized instructional strategies designed to ensure positive improvements in student learning...based on current research and adjusted according to student progress monitoring and assessment data” at the Middle School level. There is no formalized process or coordination for curriculum review and design. Department chairs work with middle and high school teachers, but this work is isolated and subject specific. The principal reports that there is no K-12 articulation, coordination, or vision for curriculum or professional development. Work that happens in these areas is piecemeal and led by individual building principals. Further, the necessary materials are not made available District-wide to “ensure that students are supported fully in acquiring the knowledge and skills specified in a comprehensive program of study.” These deficiencies are a direct violation of Sections G-12-4.2 (c), G-13-2.1 and G-13-2.2 of the BEP. G-13-1.2

In addition, the District does not have a “comprehensive set of district-wide policies that will guide the development, alignment, and implementation of curriculum,

instruction, and assessment systems to ensure that all students become proficient life-long learners” in violation of Section G-13-1.2 of the BEP. It also does not have written curriculum, nor does it provide District-wide professional development with respect to curriculum. Further, there is no separate budget for professional development outside of Title II funds which limits the scope and quality of what is offered to staff.

Recommendation: The East Greenwich School District must improve upon its coordination and oversight of curriculum and professional development at the middle school level to ensure full compliance to the BEP specifically related to:

- **Identifying the roles and responsibilities of district personnel to support curriculum development, implementation, monitoring, and revision;**
- **Providing ongoing supervision that evaluates and supports the implementation of the written curriculum;**
- **Coordinating all available resources (fiscal, personnel, and time) to support curriculum development, implementation, revision, and evaluation;**
- **Having sufficient personnel, resources, and time to design and implement an aligned curriculum, instruction, and assessment system;**
- **Engaging professional staff in the development of curriculum design and in the selection of instructional materials;**
- **Providing sufficient professional development to all staff to ensure curriculum implementation with fidelity;**
- **Disseminating current PK-12 written curriculum and related documents to professional staff and the community; and**
- **Communicating publicly the results of curriculum, instruction, and assessment design and activities to the community.**

C. High School

1. Overview

East Greenwich High School is a campus-style building originally constructed in 1967. The school houses all of the Town's educational programs for grades Nine (9) through Twelve (12). A major renovation to the athletic complex was completed in 2009 and includes a turf field, track, baseball and tennis playing surfaces as well as practice fields. The school annually garners recognition on both the state and national level as one of the leading academically performing high schools in RI. In addition, individual students are annually recognized for achievement in academics, athletics, and the arts.

2. Staffing

The High School is led by a Principal and an Assistant Principal who serves in a dual instructional and student management role. In addition, the High School's Athletic Director holds an administrative certificate and assists in administrative capacities around the school, in addition to sometimes being called on to assist other schools in the District in this capacity.

The school is projected to have a student population of seven hundred seventy (770) for the 2018-19 school year and the High School employed seventy (70) teachers in 2016-17. The principal feels that current staffing levels are adequate and allow the school to offer an appropriate number of electives for students. However, the principal reports that the lack of Central Office capacity places increased burdens on principals in the district, but that they also see increased burdens on the superintendent, who they

try not to bother with trivial matters. The principal was very clear in stating that he believes that the ability to continue to offer appropriate electives and support teaching and learning at current staffing levels would diminish as the student population approaches eight hundred (800).

The principal reports that special education teacher caseloads are at an adequate level to provide support in this area. There is also adequate support for guidance and social-emotional needs with three and six tenths of a percent (3.6) FTEs in Guidance and a part-time Psychologist and Social Worker that is shared with other schools. The number of guidance counselors within the school likely subsidizes the lack of Psychologists and Social Workers.

The High School employs a full-time Reading Specialist, but scheduling constraints similar to those at the Middle School, again limit the ability to provide intervention and supports through a systematic process designed to enable students to achieve academic success in violation of Section G-14-1.1 of the BEP.

Recommendation: The District should review its staffing and intervention procedures at the high school level to ensure that the student intervention process is in full compliance with the BEP and hire an additional Reading Specialist as necessary.

There was no Library/Media Specialist this year at the High School. Students were able to access the library with a teacher but were not able to check out books. Social Studies and ELA classes reported the most concerns around the effect this had on the quality of work that students could produce for research topics. A paraprofessional helped to keep the library open after school hours, Monday through Thursday, but was

not able to provide academic support for students in any area. Section G-13-1.3.11 defines a high-quality library-media program as one that “provides all students with multiple opportunities to access and interact with library-media instruction and materials necessary to require proficiency in the essential learning skills that support the curriculum.” It further states that “at the heart of every successful school library-media program is the teaching of effective learning strategies and information literacy skills integrated into classroom curricula.” Without a library-media specialist last school year, it would have been impossible for the District to be in compliance with this section of the BEP.

Recommendation: The District must reinstate a Library-Media Specialist at the High School in order to be in full compliance with the BEP and should not attempt to cut that position due to budgetary constraints in the future.¹⁶

3. Curriculum

Students at the High School appear to have an adequate offering of electives in Art, Music, and Tech Education. The school offers three (3) World Languages for students in all grades – Latin, French, and Spanish.

As with the Elementary Schools and the Middle School, the principal of the High School reports that the lack of District leadership for curriculum and professional development has an adverse impact on what happens at the school in these areas. Although Department Chair positions exist and exercise oversight over academic areas for Grades Six through Twelve (6-12), there is no coordination in what they are doing.

¹⁶ There is a full-time library/media position in the budget for next school year.

Without district coordination, there is no K-12 articulation for curriculum or professional development in violation of Sections G-12-4.2 (c), G-13-2.1 and G-13-2.2 of the BEP. The principal of the High School reports that administrators attempt to keep all schools on the same page in these areas, but this can prove difficult with the many other demands they face. Gaps, redundancies, and outdated curriculum documents are pervasive in all areas in violation of Chapter 13 of the BEP.

The principal also reports that there are no funds outside of Title II to support professional development. Even more problematic is that because there is no District role to provide oversight for curriculum and professional development, an outside consultant has to be hired to complete the Title II grant. This further exacerbates the lack of district-wide vision and focus on professional development, as this consultant has very little connection to what happens on a daily basis in each school. Accordingly, it seems apparent that the current program of professional development does not meet the standards set forth in Section G-13-1.2 of the BEP.

Recommendation: The East Greenwich School District must improve upon its coordination and oversight of curriculum and professional development at the high school level to ensure full compliance to the BEP specifically related to:

- **Identifying the roles and responsibilities of district personnel to support curriculum development, implementation, monitoring, and revision;**
- **Providing ongoing supervision that evaluates and supports the implementation of the written curriculum;**
- **Coordinating all available resources (fiscal, personnel, and time) to support curriculum development, implementation, revision, and evaluation;**
- **Having sufficient personnel, resources, and time to design and implement an aligned curriculum, instruction, and assessment system;**

- **Engaging professional staff in the development of curriculum design and in the selection of instructional materials;**
- **Providing sufficient professional development to all staff to ensure curriculum implementation with fidelity;**
- **Disseminating current PK-12 written curriculum and related documents to professional staff and the community; and**
- **Communicating publicly the results of curriculum, instruction, and assessment design and activities to the community.**

D. Special Education Program

1. Effective Instruction for All Students

Section G-13-2 of the BEP addresses “Effective Instruction for All Students.” It requires that:

Each LEA shall implement a set of coherent, organized instructional strategies designed to ensure positive improvements in student learning. Organized strategies shall be based on current research and adjusted according to student progress monitoring and assessment data. These organized strategies shall focus on the needs of all students using strategies for differentiated instruction based on principles of learning, human growth and development; and shall ensure that explicit instruction of reading, writing, speaking and listening is integrated across content areas. The organized strategies shall include specific interventions for students who are not meeting proficiency standards or are at risk for non-promotion or dropping out of school.

In addition, the Least Restrictive Environment (LRE), as defined by federal law is pertinent with respect to effective instruction for all students. The “Least Restrictive Environment (LRE),” as described by IDEA, 34 CFR 300.114 is defined as

(1) to the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities,

are educated with children who are nondisabled; and (2) Special Classes, separate schooling or other removal of children with disabilities from regular education environment occurs only if the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.

a. District Overview

Total Student Population- 2500

Total Special Education Population-286

4 Elementary Schools Total Student Population- 1,121 Students with IEP's-158

1 Middle School Total Student Population- 627 Students with IEP's-61

1 High School Total Student Population- 751 Student with IEP's- 67

Special Education Teacher Staffing/Caseload/Paraprofessional Supports

Special Ed. Teachers	East Greenwich	Portsmouth	Smithfield	Westerly
Preschool	2.8 + 1 Coordinator	NA	3.0	4.5
Elementary	15	12	15	10.5
Middle School	8	9	8	11
High School	8	7.5	9.5	11

Paraprofessional	East Greenwich	Portsmouth	Smithfield	Westerly
Preschool	4.0	NA	4	8
Elementary	19.5+ 6 (1:1)	15	12	24
Middle	7.0 + 6 (1:1)	9	9	14
High School	5.0 + 1 (1:1)	8	5	23

District Data supporting Least Restrictive Environment as of December 2017 (State Performance Plan Indicator #5)

% of students educated 80 % - 100% of the time in general education settings	% of students educated for less than 40% of the time in general education settings	% of students educated in private separate schools, homebound/hospitalized and private residential school settings
RI District average is 71.15%	RI District average is 11.88%	RI District average is 3.3%

EG District average is 80.27%	EG District average is .73%	EG District average is 1.36%
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District Participation and Performance of children with IEPs on statewide assessments

(State Performance Plan Indicator #3)

The disability subgroup who were able to be measured met the state’s Average Yearly Progress Target.

b. Special Education Programs/Services Available

Preschool- The East Greenwich Preschool is located at Meadowbrook Farms School. It is an integrated program containing both students with special needs, as well as typically developing community peers. These children enter the preschool program due to delays in several areas of developmental functioning. The preschool curriculum is aligned to the Rhode Island Early Learning Standards. There are also several preschool aged (3-5-year-olds) children who participate in community preschools but require some special education services. These services are provided either at the community preschool, through walk-in services, consultation with community preschool and/or home visits.

There are four (4) special educators assigned to the preschool program. One of the special educators is responsible to teach a PM session, as well as serve as the Preschool Coordinator. The role of Preschool Coordinator includes chairing the PK Special Education Team Meetings, coordinating meetings, curriculum, keeping track and recording data to RIDE, as well as attending RIDE sponsored Early Childhood Coordinator meetings.

There are five (5) paraprofessionals shared between all preschool classes. There are times that a paraprofessional needs to take a child to the bathroom, leaving only the teacher to oversee the classroom. In cases of fire or evacuation, this could potentially create a dangerous situation.

Recommendation:

- 1. Explore current staffing and consider increasing the role of Preschool Coordinator to fulltime without teaching responsibilities in order to comply with Section G-13-2 of the BEP.**
- 2. Review paraprofessional staffing of preschool classrooms, to be sure there are always two (2) adults present. Increase number of paraprofessionals if needed for safety concerns.**
- 3. Review staffing of related service personnel in order to ensure compliance with Section G-13-2 of the BEP, as there are indications that some providers feel spread too thin within the district.**

Elementary -To the maximum extent possible, children with disabilities are educated with typically developing peers within the general education classroom. Though most students receive instruction within this setting, some students require additional instruction in a pull-out resource model to address individual IEP Goals and/or reinforce re-teach or reinforce skills taught in the general education setting. There are some students who require more intensive instruction outside of the general education setting due to the nature of their disability. These students receive their core instruction within an Intensive Classroom with opportunities for inclusion in general education classes when appropriate. There are three (3) intensive classrooms within the District housed at Frenchtown, Hanaford and Eldredge School. Students participating

in these programs are provided instruction in a highly structured small classroom environment with a greater ratio of adults to students.

Special educators are assigned a caseload of students with IEPs, as well as students requiring supports through the multi-tiered system of supports (Response to Intervention Model). The average caseload of students to special educator is between six to ten (6-10) students with IEPs at the elementary level. This number does not include non-IEP students requiring support through the Response to Intervention Initiative.

Middle School- Cole Middle School services students in Grades Six through Eight (6-8). There are eight (8) grade level teams with a special educator and a paraprofessional assigned to each team. The continuum of services includes co-teaching (special educator working in the classroom with general education teacher providing support and direct instruction to students with IEP's) to making appropriate accommodations and modifications to grade level curriculum for students to make average yearly progress in grade level curriculum. Special education teachers also provide services to students outside of the general education setting in a resource model setting, whereby specific IEP goals can be addressed, general subject matter can be reviewed, retaught and or further reinforced by the special educator. There is one Intensive (Self-contained) Classroom servicing six (6) students. Students receiving services within this classroom have significant intellectual challenges requiring them to have direct individualized instruction outside of the general education classroom.

These students are included in LRE less than forty percent (40%) of the time, with supports of paraprofessionals. Next year it is anticipated this population will participate in the general education setting fifty (50%) of the time, as appropriate. Special Educators also support students involved in the RTI process, as well as students requiring accommodations through Section 504 plans. These supports include students needing both academic and/or assistance in the area defined as social emotional learning.

High School- East Greenwich High School services students in Grades Nine through Twelve (9-12). There are eight (8) special education teachers as well as seven (7) paraprofessionals supporting students. There is an assigned Department Chair who oversees both the Middle School and the High School as well as Transition services at the high school. The continuum of services includes, co-teaching in the areas of Math, English, Social Studies and Science in Grades Nine (9) and Ten (10). Students assigned to the co-taught classes are typically those functioning below grade level. Without the additional supports, accommodations and modifications offered by this model, students would demonstrate significant difficulty in achievement. Students participating in the co-taught class have access to the special educator for resource support (Study Skills Class) to address individual IEP goals, as well as reinforcing and re-teaching the content area matter. At this level, students also require support in organization, planning, study skills and other executive functions not taught in the general education classes.

In most cases, Special Education teachers can participate in common planning time, with their co-teacher during a prep or planning time. This does not occur if a special educator is assigned to work between two departments.

Also, on the continuum of services are two (2) Intensive Classroom serving students with significant intellectual disabilities. These students require highly individualized instruction in a small setting with a program focused on providing them with both functional academic and life skills, in preparation for participation in the adult world. One of the intensive classrooms focuses on students in grades Nine through Twelve (9-12). The other intensive classroom has a population of students aged nineteen through twenty-one (19-21). These are students who have not met their IEP goals in the areas of transition to adult services. They require more involvement in both community-based and vocational experiences, prior to exiting the public-school system.

c. Other Personnel Required by the Individual with Disabilities Education Act

Under IDEA 34 CFR 300.24, "Related Services means transportation and other supportive services as are required to assist a child with a disability to benefit from special education and includes speech-language pathology, audiology, interpreting services, psychological services, physical and occupational therapy, social work services, school nurse services and counseling service including rehabilitation counseling, as well as, orientation and mobility service."

Chart of Related Service Personnel in District Total Student Population 2500

District/Population Comparison	East Greenwich 2500	Portsmouth 2450	Smithfield 2395	Westerly 2790
Related Service	FTE	FTE	FTE	FTE
Psychologists	4.0	2.5	5.5	4.0
Social Workers	2.0 (.5 of one of these positions is to oversee the Mentoring Programing leaving EG with 1.5 SW to support all other work with PK-12 population)	3.0	3.0	7.7
Speech/Language Pathologist	6.0	3.7	6.0	7.8
Occupational Therapist	4.0	2.0 FTE COTA contracted with additional as needed	1 FTE- OTR 2 FTE - COTA Contracted with additional as needed	NA
Nurse Services for Medically Fragile	2 Contracted as 1:1 for Medically Fragile students	2 Contracted for Medically Fragile Students	Contracted as needed	1 Contracted as 1:1 for Medically Fragile student
	Related services not included in the chart of district personnel are on a purchase service basis, as individual needs occur requiring these specialized services			
1:1 Contracted services for students requiring specialized trained professionals due to	4.0 (most are required to address students exhibiting	NA	4.0 Therapeutic Techs 1-Elem 1-MS 1 HS	NA

the nature of their disabilities	challenging behaviors			
Other include Teacher of Deaf, Orientation and Mobility Trainer, Teacher of the Blind and Visually Impaired	Purchased services on an as needed basis and can vary from year to year	Same	Same	Same

d. Access to General Education Curriculum

Section G-14-1 of the BEP requires each LEA to “ensure that all students have the opportunity and skills necessary to access the systems of developmentally appropriate, targeted, and responsive academic supports and interventions for learning that they need to become college, work and career ready.” This section of the BEP requires that the academic supports and interventions of the District “coordinate with and supplement instruction in the guaranteed and viable comprehensive program of study.”

As was previously articulated in Section IV (a-c) of this report, the District is in clear violation of many of the standards set forth in Chapter 13 of the BEP with respect to a uniform and articulated district-wide curriculum. The effects of this violation are even more devastating to special education students. At all levels in the District, special education students participate in general education curriculum with accommodations and modifications as needed. In order to provide appropriate instruction, special education teachers need access to curriculum materials including student and teacher editions. Concerns by staff at all levels focused around the lack of a Director of

Curriculum/Assessment. East Greenwich has been without a leader in this position for six years. Without this position, and the necessary resources and staffing to support the position, curriculum is inconsistent across all grade levels and in all subject areas.

Without the consistency of a General Education Curriculum, the work of the special educator to accommodate and modify curriculum, so students can access general education, becomes more difficult. Accordingly, the District's lack of compliance with Chapter 13 of the BEP, leads to violations of Chapter 14, as it is very difficult to provide accommodations and modifications to curriculum, when there is no uniform, articulated curriculum in the District.

Elementary Level

Reading- Each school has a fulltime Reading Specialist. Responsibilities vary between buildings, but in most cases, they support all students. There are times a Reading Specialist may be called upon to provide specialized reading instruction to students with IEPs. Orton Gillingham and Wilson Reading Programs require special training and not all schools have staff who are certified. Concern of staff in all buildings is the lack of a consistent reading program, scope and sequence and lack of curriculum guidelines. As one individual stated, "ELA is a hodgepodge." Another says we are using a "disjointed approach." Staff are doing their best to create some sort of consistency within their buildings. At one school, a scope and sequence for ELA (includes reading, writing, spelling) is created by a Reading Specialist. There was an indication the School Committee was moving toward adopting a reading program at

the elementary level, but perhaps due to budget constraints it was eliminated. The lack of a consistent English language arts curriculum and the inability of the District to maintain “congruence among and across the curriculum, instruction, and assessment” of English Language Arts is a violation of Section G-13-1.3.1 of the BEP.

Math- There is a .5 Math Specialist, whose salary is paid through Title I funds in three (3) of the four (4) elementary schools. Envisions Math, a K-5 Common Core Math Program, is implemented in the four (4) elementary schools. Though this program provides consistency within all four schools, staff have indicated a need for additional training for themselves and the paraprofessionals who provide additional supports to students with special needs. The lack of professional development, as previously stated is a violation of Section G-13-1.2 of the BEP. Currently, there is no written curriculum for Math. Elementary Schools are following the scope and sequence of Envisions Math, as their guidance.

Science and Social Studies- Two (2) elementary schools use the K-2 science-based kits. Eldredge and Hanaford Elementary School refer to STEMScopes for science. There is no formal written curriculum or scope and sequence for either science or social studies in violation of Section G-13-1.1 of the BEP.

Middle School/High School- All reading interventions are done by a Reading Specialist at both schools. Neither school has a Math Interventionist. The need for reading and/or math interventions for all students is determined through the multi-tiered system of supports, response to interventions (MTTS/RTI) problem solving team.

When a student seems to be struggling, the team reviews and examines data, determines interventions and supports needed by the child. Lexia, which is an online program used to address phonetic instruction and designed to support dyslexia has been implemented. Both schools use the STAR Screening Tool for both Reading and Math.

At the Middle School, students requiring additional supports are provided a scheduled block of learning time called "Lancer Learning Time." Lancer Time is scheduled three (3) times/week, throughout the school for all students with a variety of other uses, based on student need. The High School offers "Check and Connect" three (3) times a week (1 Math, 1 ELA and 1 Science) during afterschool hours for those students requiring additional supports. There is also an opportunity for students to access their Math teacher during part of an advisory block of time. Students determined Learning Disabled in Reading and having an IEP goal, also receive support from the special educator.

Science and Social Studies Curriculum – There is no current written Science or Social Studies curriculum, or scope and sequence provided by the district in violation of Section G-13-1.1 of the BEP. Staff within buildings do their best to generate curriculum guides.

Recommendation:

- 1. Hire a Director of Learning to oversee all aspects of curriculum development, learning and assessments.**
- 2. Create a consistent curriculum template across all grade levels.**

3. **Adapt a district-wide reading program for elementary school.**
4. **PK-12 articulation between all stakeholders, including special educators.**
5. **Weekly Common planning time for special educators and general educators to discuss and plan lessons in a timely manner. There are students who require the special educator to accommodate or modify curriculum and evaluations. Without having a specific time to meet weekly, these accommodations and modifications are difficult to implement.**

2. *Safe, Healthy Learning Environment*

Section G-14-1 of the BEP requires all District to ensure that “schools create a climate of safety, security and belonging for all students and adults, thereby establishing an environment that builds respectful relationships, enhances productive learning and teaching, promotes school engagement, and promotes academic success.”

a. Supporting Physical and Mental Health Needs

Section 14-2.1.4 of the BEP requires an LEA to “ensure that schools promote a positive climate with emphasis on mutual respect, self-control, good attendance, order and organization and proper security.” As part of supporting physical and mental health needs, Section G-14-3.2 of the BEP requires, an LEA to “ensure that student have access to a coordinated program of culturally and linguistically responsive psychological and mental health services on site or through effective referral systems.” There is a further requirement that “school psychological and mental health services will be provided by appropriately credentialed, high quality staff.”

The East Greenwich School District engages in a Positive Behavioral Intervention and Supports Methodology, whereby the entire school community engages in embedded social-emotional curriculum and a tiered system of positive behavior

interventions, intended to teach and support positive behaviors. For students requiring additional supports, the tiered system provides students with more intensive interventions which may involve guidance counselors, psychologists, social workers, and student assistance counselors. Purchased services of behavior specialists and district paraprofessionals, trained in data collection and progress monitoring are also made available, as needed. Other district-wide supports in place include a Mental Health Committee and a Student Support Mentoring Program. The Mental Health Committee, composed of both community and school personnel, meet and publish a bulletin offering families insight into the growing need for social-emotional learning and resources available to assist children in gaining and maintaining healthy attitudes and relationships. The goal of the Student Support Mentoring Program is to build relationships with students either in group activities or in individual one on one mentoring sessions with identified students and mentor volunteers.

Though there is a positive systemic philosophy and system of supports for students with social/emotional and behavioral concerns, the assessment of special education services again found that the District is lacking in the number of staff with the knowledge, training and expertise in this area in violation of Section G-14-3.2 of the BEP. In conducting interviews with school teams, including school Social Workers and School Psychologists, there is limited time to provide direct service to students. The role of School Psychologists varies from building to building based on the need of the population, but all perform components of responsibility as defined by IDEA. This

related service is defined by IDEA 300.34 (c) (10) and includes such things as “administering and evaluating psychological tests, interpreting results, obtaining, integrating and interpreting information about child behavior and conditions relating to learning, consulting with staff members in planning school programs to meeting special educational needs of children, planning and managing a program of psychological services including counseling for children and parents and participating in development of positive behavior interventions.”

The two (2) full-time Elementary School Psychologists split their time between the four (4) elementary schools. Each of them is committed to two (2) days of participation on the Special Education Evaluation Team, leaving them with only (3) three days to perform any or all the defined duties. There is one (1) full time Psychologist split between the Preschool (2 days) and the Middle School (3 days) with one (1) day participating on each of the Special Education Evaluation Teams. This leaves little time for direct services at the Preschool, as she is often called for emergencies at the Middle School. The High School has one full-time Psychologist to provide all services. Psychologists at all levels have times when they are missing direct student services required under a student’s IEP, due to situations that may arise in their building or another building they are summoned to for services. This becomes a compliance issue under the IDEA regulations, resulting in a requirement for compensatory services.

The role of School Social Worker as defined by IDEA 34 CFR 300.34 (c) (14) is

to prepare a social developmental assessment on a child with a disability, provide group and individual counseling with the child and family, work in partnership with parents and others on problems in a child's living situation (home, school, and community) that affect the child's adjustment in school and mobilize school and community resources to enable the child to learn as effectively as possible in his or her education program, as well as assist in developing positive behavioral intervention strategies.

There are two (2) Social Workers in the District responsible for serving both general education and special education students. The total population of students throughout the district is approximately two thousand five hundred (2500). Of the two (2) Social Workers, one (1) is available to provide the IDEA defined responsibilities to the Preschool, Eldredge and Cole Middle School on a part-time basis, serving a population of one thousand seventy-five (1,075) students. The other half of her assignment is to direct the student mentoring program. Currently, there are sixty-five (65) students in the mentoring program, which requires the Social Worker to assign students to mentors, schedule meetings and provide supervision to the mentors and the mentor/mentee relationship. The other social worker is assigned to provide services to Frenchtown, Meadowbrook, Hanaford and the High School. The population of these four (4) schools combined is one thousand four hundred twenty-five (1,425) students. There were ninety-six (96) cases requiring her involvement. Fifty-two percent (52%) of the students she serviced were students on IEPs. There were twenty-one (21) Social Histories, one hundred fifty-two (152) formal educational meetings, as well as one hundred one (101) social skills trainings in the classroom. Other less frequent

involvement included, risk assessments, crisis intervention, truancy court and several cases requiring an extreme amount of intervention and legal documentation.

According to the National Association of Social Workers (NASW, 2012) “school social work services should be provided at a ratio of one school social worker to each school building serving up to 250 general education students, or a ratio of 1:250 students.” Statistically, the East Greenwich School Department has an insufficient number of social workers needed to provide the quality of services to students and families in this community.

Recommendation: Increase the number of social workers from 2 to 3.5. This is an increase of 1.0 FTE Social Worker and replacement of the .5 SW who is currently being used to oversee the District Mentoring Program.

b. Providing a Safe and Accessible Learning Environment

The American with Disabilities Act of 2010 addresses the issue of playground accessibility. In brief, according to ADA Chapter 2, Section 240 and Chapter 10, Section 1008, an ADA Compliant Playground will:

- a. be accessible via ramps and/or paved barrier free travel routes
- b. include a range of accessible play options and
- c. provide an appropriate surface beneath all accessible equipment

Guidelines are designed to ensure a variety of opportunities for children of all abilities.

Play components are described and counted based on the type of experience they provide.

Meadowbrook Farms School has a playground which may need to be upgraded due to the placement of a student with significant mobility issues, who requires the use of a specific travel device requiring a smooth surface. In addition, the child will need access to play equipment in the playground. When the 2018-19 school year begins the child's access will be extremely limited.

Recommendation:

- 1. Review of current playground surface for accessibility, based on child's individual physical needs.**
- 2. Review of playground equipment to ensure child will have access to some outdoor activities.**
- 3. Purchase materials and equipment if determined there may be issues of non-compliance of ADA.**

East Greenwich High School (Current and Future Planning).

The Rhode Island Board of Education Regulations Governing the Education of Children with Disabilities § 300.115(A)(6) requires that a "continuum of services must be available to enable each child ages fourteen (14) to twenty-one (21) or earlier if appropriate, or upon graduation with a regular high school diploma, to achieve his or her measurable post-secondary goals as defined in §§ 300.43 and 300.320(b). § 300.43 requires that a district provide students with disabilities "transition services," including, if appropriate, "acquisition of daily living skills and provision of functional vocational evaluation."

The High School continuum of special education includes two (2) Life Skills Programs for students with more significant cognitive and developmental delays in order to fulfill the requirements of § 300.43 of the Rhode Island Board of Education Regulations Governing the Education of Children with Disabilities. These programs service students in Grades Nine through Twelve (9-12) and those deemed eligible to continue their education until age twenty-one (21), as part of their transition to adult services and supports.

Classroom space for the Life Skills programs is very limited, making provision of needed skills to obtain some level of independence, nearly impossible. There was a five-year (5) plan for expansion into some adjoining rooms, to teach the functional skills of bed making, housekeeping, cooking, general household maintenance and advanced vocational skills. Staff is concerned this plan may not come to fruition, as there is a shortage of space for other high school classes.

Currently, accessibility to the classroom and bathrooms in this program is adequate. During the 2019-2020 school year, accessibility to a handicapped bathroom with room for an adult sized changing table and other equipment will be needed. Though there is a handicapped bathroom available via an elevator (sometimes not operating) and down a hallway, it is quite a distance from the classroom. The time it takes to travel to the facility and address the personal care needs of a student, greatly impacts and interferes with the required instructional time, therefore denying access to

curriculum. This would be a violation of the Americans with Disabilities Act, 42 U.S.C. § 12101. A bathroom within the classroom would remedy this upcoming situation.

Recommendation:

- 1. Re-visit the five-year (5) plan for expansion of the Life Skills Program Space.**
- 2. Install a handicap accessible bathroom with room for a changing table, within the Life Skills Program wing or within the vicinity of the current program for the 2019-2120 school year.**

V. REVIEW OF PERSONNEL CONTRACTS

Section G-15-2.2 of the BEP addresses human capital. It requires each LEA to “establish a set of policies and an array of strategies to recruit, hire, and retain highly effective district and school personnel...”

The East Greenwich School Committee is a party to three Collective Bargaining Agreements:

- East Greenwich Educational Association NEARI/NEA September 1, 2016 - August 31, 2019 (Certified staff)
- East Greenwich Association of Education Support Professionals NEARI/NEA, July 1, 2017-June 30, 2020 (Non-certified staff)
- East Greenwich Custodians/Maintenance Association NEARI/NEA, July 1, 2015-June 30, 2018.¹⁷ (Maintenance/Custodians).

A. NEARI CBA Certified

The pay scale for the certified staff is well within the range of the other school districts in Rhode Island. At a tenth (10th) step salary of eighty thousand four hundred

¹⁷ A successor agreement is presently being negotiated

seventy-six dollars (\$80,476), East Greenwich pays its teachers less than New Shoreham, Newport, North Kingstown, Smithfield, South Kingstown and Warwick.¹⁸ In addition Barrington, Bristol Warren, Chariho, Exeter/West Greenwich and Lincoln have a higher salary scale for senior teachers.¹⁹

In terms of Increment Classifications for money paid to teachers who have advanced course work or additional degrees, East Greenwich ranks as one of the lowest districts in the state.²⁰ In addition, East Greenwich is one of only a few districts that does not offer any longevity supplement.

With respect to medical benefits, in order to keep down rising health insurance costs, the East Greenwich School Committee, negotiated an HSA plan where the teacher pays a twenty percent (20%) cost share and is required to cover one-half (1/2) of their deductible plan. This plan, once fully implemented, will save the District a substantial amount of money on any additional cost to medical insurance.

In reviewing the certified employee contract in comparison to several other contracts around the state, our financial expert determined that it was in line with other contracts in terms of benefits provided to certified staff, and in fact, contained more cost savings than most certified staff collective bargaining agreements. It was her opinion

¹⁸ See 2018/2019 Teacher Pay scale provided by the RIASC

¹⁹ Barrington has 11 steps, Bristol Warren has 12 steps, Chariho has 12 steps, Exeter West Greenwich has 12 steps, Lincoln has 11 steps.

²⁰ See 2018/2019 Increment Classifications provided by RIASC

that there is nothing else that the District could do to bring about cost savings under the contract and maintain a competent work force.

B. NEARI CBA Non-Certified

The contract for the non-certified staff is within the range for noncertified contracts within the state.²¹ Because some contracts have different steps, it is difficult to conduct a straight forward comparison. However, an outlier within the contract for the District's non-certified CBA is the fact that the East Greenwich School Committee was able to negotiate an HSA with a deductible amount of one thousand five hundred dollars (\$1,500) for individuals and three thousand dollars (\$3,000) for family. Although the District has agreed to fund sixty percent (60%) of the deductible, the staff is still required to contribute from seventeen percent (17%) to twenty percent (20%) of the cost of the plan. This is an extremely unusual provision, resulting in cost savings in comparison to other non-certified contracts throughout the state.

Based on the total salary that these employees receive and their contribution to health benefits, it the opinion of our financial expert that it would be impossible to negotiate further savings from this group of employees and maintain a work force.

C. NEARI Maintenance/Custodians

The collective bargaining agreement with the maintenance/custodians for the 2018-19 School Year is presently being negotiated. For the 2017-2018 school year custodians were paid from fourteen dollars and five cents (\$14.05) to nineteen dollars

²¹ The contract was compared to Smithfield, Barrington, North Kingstown and Portsmouth

and thirty cents (\$19.30) per hour, maintenance personnel were paid nineteen dollars and forty-nine cents (\$19.49) per hour and an electrician was paid twenty-seven dollars and sixty-two cents (\$27.62) per hour. In an analysis of the schools in the District, it was clear according to the experts' review that these positions are under-staffed. It is possible that because of the low pay given to these positions, that they are difficult to fill. A new custodian hired under the starting wage of fourteen dollars and five cents (\$14.05) would make less than thirty thousand dollars (\$30,000) per year. In comparison to other districts, this is low. Based on a review of this contract, it would be very difficult to negotiate any further savings.

Overall based on the present personnel contracts, it is evident that the East Greenwich School Committee has negotiated contracts that will save the District money in years to come. Furthermore, there is nothing else that can be removed from these contracts if East Greenwich wants to hire and retain quality staff.

VI. REVIEW OF INFORMATION TECHNOLOGY (IT)

The BEP defines a twenty-first (21st) century learning environment as one where

all students are able to learn, instruction is engaging, interactive, contextual in the real world, student centered and differentiated for individual learner needs; 21st century tools and technologies are integrated into the learning process; systems (technological and otherwise) are student and learning focused.

The BEP further discusses the importance of technology in the context of accountable operational systems in Chapter G-15-2. It emphasizes that “a comprehensive, integrated information system is essential to the creation and support of a 21st century learning environment.” Section G-15-2.1 requires each LEA to “develop and adequately maintain comprehensive, accessible, and transparent information systems with specific implementation of strategies that address” (1) student learning; (2) system efficiency and effectiveness; (3) communication and support; and (4) technical support. For these reasons, all school departments must have an IT Department which can support the guidelines set out in the BEP.

The District’s Information Technology Department is currently in a state of flux. Of the three (3) employees currently projected in the Budget for the District, two (2) positions are vacant, including the critical position of Director of Technology. It is impossible for a District to be able to comply with the technology guidelines for twenty-first century learning in the BEP with only one (1) employee spread out amongst six (6) schools, more than twenty-five hundred students and hundreds of employees. Further, even if those two (2) positions are filled, the District is still understaffed in the IT Office. Properly servicing administration and the needs of six (6) schools, even while working remotely, with three (3) staff members is not likely enough to meet the guidelines set forth in Section G-15-2.1 of the BEP. According to interviews, it does not appear that there are any available IT staff from the Town to provide assistance to the School Department. This is common, as a school department has a much greater need in the IT

Department in comparison to a town, outside of police and fire whose IT work is usually outsourced.

In addition, under the current staffing structure, the Confidential Assistant to the Superintendent is currently the administrator of the District's website. Therefore, time is taken away from her important duties in Central Office in order to make up for the lack of staffing in the IT Department.

Recommendation: The vacant IT positions should be filled as soon as possible. In addition, a thorough review of staffing in the IT Department should be conducted and additional positions should be added as necessary.

In addition to the capacity of the current staff to comply with the BEP, the auditing of technology throughout the District indicates a lack of systems needed to fulfill the requirements of the BEP. The IT Department has suffered from the denial of access to many Munis modules. A full investment analysis should be undertaken to educate employees in charge of Munis access as to the correct way to set up software security and provide employees of the school department with the tools needed to use the program to its fullest extent. Munis is a powerful software program that can provide efficiencies and accurate financial data. Efficient processes should not be given up based on the Town's desire for control over the school department. Redundant tasks and multi data entry points are unnecessary if Munis is used properly and efficiently.

In addition, at the school level, particularly at the secondary level, principals noted that there is a lack of support in the area of technology to ensure that hardware and software systems operate in an adequate and efficient manner in compliance with the BEP.

Recommendation:

- 1. The School Department must be given access to, and trained on, all Munis modules by the Town.**
- 2. All systems should be thoroughly reviewed, with input from the High School, in order to determine if hardware and software systems are working in an adequate and efficient manner.**

Another area of concern throughout the District is with respect to the effect of the lack of staffing on hardware and required devices. The high school cited a major concern over several machines in the science lab which are “down” and unable to be repaired or have not been repaired in a timely manner. This has forced students to double up on machines, which has an impact on the quality of instruction teachers can provide and may be a violation of Section G-15-2.1 of the BEP.

Concerns over hardware and devices are particularly pertinent in the context of special education students. Students requiring Assistive Technology Devices (specified in IEP or 504 plans) are provided with recommended technology, as funded through special education pursuant to IDEA or Section 504 of the Rehabilitation Act of 1973. The High School Life Skills programs, which services a population of students requiring the color printing of signs, symbols and pictures needed for communication is frequently required to access color printers outside of their immediate vicinity. There are times these symbols are needed quickly by teachers, the speech language pathologist and the occupational therapist in order to assist students with communicating to those in their environment. The lack of an accessible color copier in

the area of the LifeSkills program is impacting their ability to access their education and is therefore likely a violation of IDEA.

Special education staff also voiced concerns that due to lack of support in the Technology Department, work orders are slow to process. When a device is not working properly, there is no one to troubleshoot these issues, leaving students without required tools for accessing education in violation of either IDEA or Section 504.

A further issue with respect to special education is available compatible technology to assist students in accessing their education. Currently, staff and students have access to Chromebooks. Many of the applications and required specialized programs for special education students are compatible with the MacBook but not the Chromebook. There is also a need for additional iPads for special education staff who conduct assessments and provide instruction using a variety of applications for the most developmentally delayed students. In addition, iPads and other technology are not replaced or up to date with new technology.

Another concern expressed by administrators related to the review process for purchases of programs, apps and subscription renewals by the Technology Department. Without their full understanding of these requests, ordering doesn't always take place in a timely manner and creates liability for the District under IDEA and Section 504.

Recommendation:

- 1. Increase support in Technology Department**
- 2. Conduct a survey of staff related to need for devices other than**

Chromebooks i.e. MacBook and iPad to support programs and apps requested by staff to meet the individual needs of students.

- 3. Purchase devices necessary to provide the appropriate programming and apps to students with special needs.**
- 4. Purchase of a color printer for the high school Life Skills Program.**
- 5. Ongoing discussion between Department of Special Education and Department of Technology to increase knowledge and awareness of the unique needs of some students requiring devices and different programs and apps.**

Section G-15-2.1 requires the District to have a “comprehensive, integrated information system.” In contrast to this, an overriding theme with respect to technology in the district is the lack of comprehensive systems, as detailed above, and also, the lack of any plan with respect to the acquisition of technology. The District currently has no plan for refreshing technology that has been purchased instead of leased, i.e. current computer labs and 1:1 devices, as well as other technology. While purchasing technology used to be less expensive, available leasing options have become much more favorable and allow for consistent budget planning for needed technology. The risk that is taken with a straight purchase of technology, especially 1:1 devices, is the quick and eventual obsolescence associated with technology. The concern noted is that without a clear, committed, funded technology plan, planning for obsolescence will be done reactively instead of pro-actively and the delay in upgrading technology will contribute to the deterioration of the strength of the district.

Recommendation: An updated five-year technology plan should be formulated, working with Town leaders to discuss funding. It is recommended that the first order of business for the new Director of Technology is a full assessment of needs

and a replacement/refresh plan be established that has a consistent, reliable funding source.

VII. REVIEW OF HUMAN RESOURCES

Human Capital and importance of recruiting and retaining qualified staff is addressed in Section G-15-2.2 of the BEP. It requires each LEA to “develop, implement and monitor a human capital system that is connected to its educational improvement strategy, and supports people with the knowledge and skills necessary to execute that strategy.” The cornerstone of any plan to recruit, support and retain highly effective staff, as required by the BEP, is a strong Human Resources Office.

It has been communicated that HR functions between the School Department and Town are largely consolidated. Currently, there is one (1) part-time/shared HR Coordinator/Administrative Assistant, who devotes eighty percent (80%) of time to the School Department and twenty percent (20%) to the Town. One consequence of this is that the auditors were unable to gain the information to complete an analysis of this department. However, there were issues cited by the School Department, which hinder the District’s ability to comply with Section 15-2.2 of the BEP. Primarily, having an entire HR Department run by one employee, who is working only eighty percent (80%) of the time for the School Department, is not sufficient to comply with human capital requirements in the BEP.

Due to the lack of staffing, there are human resource duties that are performed outside the HR Office by personnel who are not qualified HR professionals. Teacher job

posting in the summer are currently administered by the Confidential Administrative Assistant to the Superintendent. Personnel disciplinary actions, progressive discipline and recommendations for employee terminations also appear to fall entirely outside the confines of Human Resources, which is likely a violation of the BEP. These job duties should be managed within the confines of a well-functioning HR department to ensure all legalities relative to staff and faculty hiring are appropriately administered.

It also appears, most likely due to a lack of staffing, that most job descriptions throughout the District have not been recently updated. It is essential to the requirements for human capital pursuant to Section G-15-2.2 of the BEP, that job responsibilities are correctly identified and placed with the most appropriate staff member to ensure internal process continuity and control.

Recommendation:

- 1. Add a FTE position in Human Resources.**
- 2. The postings of vacant teaching positions should be completed by personnel in Human Resources.**
- 3. Personnel disciplinary actions should be undertaken with strong HR support and guidance.**
- 4. Job descriptions should be updated and employee duties thoroughly reviewed.**

In addition to HR not performing duties which should fall under its purview, it is performing duties that should fall outside of the Office's scope. These misplaced duties take away from amount of time the HR Coordinator has with the School Department. Currently, oversight of school lunch applications for FRLP, management

of the NutriKids and eSnacs programs are done by the part-time School Department HR Coordinator.

Recommendation: Duties relative to the school lunch program currently administered by the HR Coordinator should be reassigned to the appropriate personnel.

VIII. REVIEW OF BUILDINGS AND GROUNDS

Section G-14-4 of the BEP states that

school facilities – consisting of the site, building, equipment, and utilities- are major factors in the functioning of the educational program. The facilities provide more than a place for instruction; they assist or limit the potential for student achievement of desirable learning outcomes.

This Section of the BEP requires each LEA

to recognize and promote the belief that 21st century high performing facilities must provide a physical environment that contributes to the successful conduct of the program that has been designed to meet the educational needs of students.

Section G-15-2.4 of the BEP provides further detail on required “Facilities Oversight.” G-15-2.4 requires schools to prepare long-range plans with annual revisions and updates regarding planning, coordination and maintenance. It also requires

Safe, Healthy, and Sanitary Physical Environments:
All school facilities, which shall include buildings, grounds, and equipment necessary for the provision of instructional programs, shall be operated and maintained in safe, healthful, and sanitary condition. The physical environment of all schools shall be in compliance with local, state, and federal standards, codes, laws, and regulations regarding

health and safety, accessibility, and energy conservation.
Each LEA shall have a chemical hygiene plan.

At present, the current Director of Facilities functions with no dedicated administrative support and acts as the main conduit of all data in and out of this department relative to the maintenance and custodial operations of the School District. With six (6) buildings to support, this is unheard of statewide. While the Director should be commended for his dedication to the District over the years, and his ability to keep the District functioning with no department resources and limited funding, additional custodial staff, administrative support for the Director and a full analysis of facilities needs both short term and long term should be considered.

While the District has a five-year asset protection plan as required by RIDE, new regulations requiring the level of routine maintenance expenditures are forthcoming. In order to continue to receive school construction/housing aid, a district must meet minimum maintenance expenditure levels on a yearly basis. Once the regulations are communicated by RIDE, an analysis should be done to ensure that the district meets the standards. This might add to the FY19 budget should minimum funding not be available. One (1) additional custodial staff is estimated at approximately forty-five thousand dollars (\$45,000), assuming individual health and dental benefits. An administrative assistant for the facilities department is estimated at fifty-five thousand dollars (\$55,000), assuming the ability to find an employee at the Step 1 contractual hourly salary and individual benefits. Both of these positions are necessary to come within the guidelines of the BEP.

Administrators at each individual school also mentioned that they feel the effects of limited staff and budget toward facilities. Principals cited many facilities' issues, including safety related concerns, that have been going on for years. One school has reported water pooling around the outside, termite infestations, water damage in the ceiling, mold and cracks in the blacktop where the children play that are large enough to cause injuries. All principals have noticed that the buildings are not receiving general and thorough summer refurbishment cleanings as in the past. Many commented that the buildings do not look as fresh, new and clean as they should for children. The principals of both the Middle School and High School noted that maintenance in the building has been deferred for years and that maintenance requests are taking longer and longer to fulfill. All of these deficiencies are violations of Section G-14-4 and G-15-2.4 of the BEP and potential liabilities.

The operation of schools in a safe manner, as required by Section G-15-2.4 of the BEP is also a concern, particularly at the Middle School and High School. Although the Middle School building is a relatively new physical structure, the principal reports that the structure is not in line with best practices in school safety design. Safety and the school's physical plant are also a concern for the High School. Although there is a School Resource Officer housed at the School, and the District maintains a good working relationship with the East Greenwich Police Department, the school building does not have updated exterior safety access and there is inadequate camera access for administrators.

Recommendation:

- 1. Review and increase custodial staffing.**
- 2. Conduct a thorough review of all maintenance and safety issues within the schools and develop a plan and budget for repairs.**
- 3. Update exterior safety access at the High School.**
- 4. Install adequate camera access for administrators at the High School.**

Perhaps the biggest area of concern for the District with respect to the Facilities Department is its lack of long range planning in explicit violation of G-15-2.4 of the BEP. The first mistake that many Towns have made over the last ten (10) or more years is to make the first fiscal cuts out of the maintenance/capital upgrade funds of the City or Town. For years, districts have cut routine maintenance and capital upgrade funding for Town and school buildings and the Town of East Greenwich is no exception. The lack of understanding of the difference between routine maintenance and capital expenditures is typical, as well as the inability of many officials to understand the connection between the two. As evidenced by statewide reports on the status of school buildings²², Rhode Island has a dire problem in terms of maintaining and upgrading school facilities on a short-term and long-term basis. This area is one that many people cannot or will not acknowledge because the problem has grown so large, that the dollars associated with upgrading area schools to the level needed, is onerous and out of the realm of conceivable funding need and availability.

It is therefore necessary for a full capital upgrade funding plan to be formulated for the District with a reliable funding source in order to ensure that it can come into

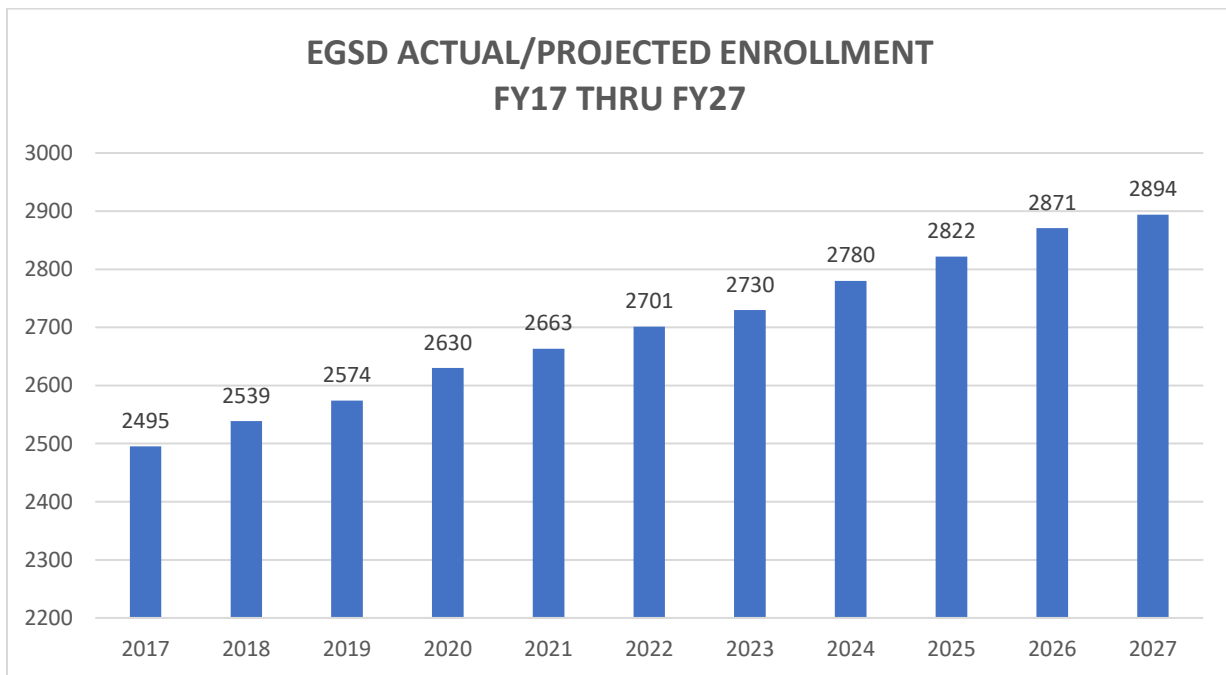
²² http://www.ride.ri.gov/Portals/0/Uploads/Documents/Funding-and-Finance-Wise-Investments/SchoolBuildingAuthority/RIDE-Facility-Condition-Report2017_FINAL.PDF

compliance with Section G-14-4 and G-15-2.4 in the future. The Jacobs Engineering Facilities Condition Analysis notes a need in the District for forty-three million dollars (\$43M) in repairs over the next five (5) years with twenty-nine million (\$29M) of those repairs deemed as current, priority one (1) deficiencies. There is currently no plan to address these issues. It should be kept in mind that the priority two (2) and three (3) deficiencies that comprise the remainder of the forty-three million (\$43M) will only get worse and will become priority one (1) deficiencies as time passes. The largest needs are noted at the High School and Meadowbrook. Additionally, due to the lack of planning for future capital upgrades in the District, the Town of will be behind the curve in taking advantage of a possible two hundred fifty million dollar (\$250M) state bond referendum currently on the ballot for November 2018. While the District receives the minimum housing aid funding of thirty-five percent (35%), that is still a very large percentage of expensive, required repairs that the Town of EG will not be in a place to take advantage of, due to the lack of a plan with a reliable funding stream to address critical school building needs.

Recommendation: Formulate a full capital upgrade funding plan based on the Jacobs Engineering Facilities Condition Analysis.

The reason why advanced planning for capital improvements is of particular importance in East Greenwich, is because it is one of the few districts in the state that enjoys increased enrollment and is projected to sustain increased enrollment over the next five (5) years. While this is certainly a testament to the desirability of the Town, increased enrollment projections should be closely monitored and updated. Presently,

of the six (6) schools in the district, four (4) are deemed to be over capacity, while the remaining two (2) are near one hundred percent (100%) capacity. Hanaford and Eldredge Schools are deemed to be more than fifty (50%) over capacity. Enrollment is projected to increase by approximately fourteen percent (14%) by the year 2027. Continued increased enrollment will stress the District to the point of having no room for students. A current, accurate enrollment analysis can help the District understand short-term and long-term needs that need to be addressed now to accommodate students projected to enter the school system.



Data based on NESDEC projection enrollments from data thru FY18 school year.

Recommendation: The District should commission a detailed enrollment projection analysis using current data points including, but not limited to, current enrollment by age, grade, demographic information relative to births and school aged children as well as housing data for new developments/sales history, in order to provide the District with an accurate planning tool for future school needs.

IX. REVIEW OF ATHLETIC PROGRAMS

Section G-14-2.2 of the BEP states that each LEA shall “provide a broad spectrum of activities, programs, and services that directly involve families in their children’s education and personally engage families in the school.” More specifically, Section G-14-3.4 of the BEP requires school departments to “Provide a variety of physical activity opportunities to students in grades 6-12, such as stretch breaks, dance programs or classes, intramural athletics, interscholastic athletics or other activities.” Accordingly, athletic programs are a recognized method for ensuring student connectedness to their school community and have many personal positive outcomes for students. In addition, athletic programs are a vehicle for family engagement at the high school level.

There are currently thirty-three (33) total teams in the District between High School, Middle School, and Unified athletic programs. All programs are supervised by the High School Athletic Director. The athletic offerings in the District, in both the Middle School and the High School are adequate.

The current budget to support all District athletic programs is thirty-one thousand dollars (\$31,000). This budget was fifty thousand dollars (\$50,000) when the Athletic Director started nine (9) years ago. This budget includes payments that must be made for officials, buses, supplies, and equipment; along with a thirty (30) hour per week contract for an Athletic Trainer which is a requirement from the RI Interscholastic League. Because of the continuous slashing of the Athletic budget, each year the

Athletic Director has had to cut back in different areas to stretch the budget. For instance, he often skips a Fall or Spring season re-stripping of the lines on the turf field, which is against best practice for safety reasons. The Athletic Director reported that he often gets calls from vendors and officials about late payments. He does not have direct contact with anyone in the Town Finance Office and does not know what happens to requisitions after he submits them.

Also troubling is the fact that the athletic field turf is completing its ninth year of use and is coming up on the end of its replacement cycle. If this turf is not replaced, it could cause a significant safety hazard for student athletes.

One rather puzzling piece of information concerning the Athletic Department is that although the athletic complex garners a great deal of use from outside organizations, there is currently no user fee for the use of the facilities. Collecting fees for usage is standard practice in most districts and seems to be an untapped financial resource to help offset costs in the athletic department for impending turf replacement.

In addition, the Athletic Department is heavily dependency on booster club and parent groups to fill in monetary gaps to supply uniform replacements, supplies, and other team needs. The Principals at both the Middle School and High School report that their sports' programs depend on these contributions. Since athletics are required by

the BEP and are a part of a student's educational program, constitutionally they need to be funded by the District as part of FAPE.²³

Recommendation:

- 1. The District is encouraged to review its overall budget for high school athletic programs to ensure they are financially supported at an adequate level and do not place an undue burden on parent groups, made up of parents who are already paying taxes to support the school district, to fund for essential needs.**
- 2. The District should replace the field turf at the Athletic Complex for safety reasons.**
- 3. The District should begin charging outside entities for usage of its athletic facilities.**

X. REVIEW OF FINANCE

Section G-15-2.3 of the BEP addresses the importance of fiscal oversight in a School Department. This section requires each LEA to

Ensure the fiscal health of the LEA and provide public accountability through the adoption of sound fiscal policies and oversight of the LEA financial condition. Furthermore, the LEA shall ensure that the financial systems support the LEA mission that includes goals for student achievement and a high-quality educational program.

Section G-15-2.3.1 of the BEP also requires each LEA to adopt and maintain a financial accounting system. It requires LEAs to engage in "thorough advance planning in order

²³ See *Giannini v. Council on Elementary and Secondary Educ.*, 2016 WL 1294209 (2016)

to develop budgets and guide expenditures..." and "use the best available techniques of long range planning, budget development, and budget administration..."

Presently in East Greenwich, the School Department and Town Finance function are partially consolidated in terms of a shared Director of Administration/Finance (reportedly 50/50 school and town) and a shared payroll employee. The Director of Administration/Finance reports that there is a consolidated Finance Department with many fiscal and payroll employees as part of that consolidated department. However, the information presented shows that while the Director of Administration performs fifty (50%) of her duties for the School Department, there are only two other employees who work for the School Department- a Deputy Director of Administration and a payroll clerk. The payroll clerk may be assigned future increased responsibilities for Town payroll duties. An organization structure shows three (3) fiscal clerks for the Town, but their duties relative to the School Department are unclear.

In addition to the potential lack of staff devoted to the School Department in the consolidated Finance Department, it appears that although consolidation of the Finance Department has been noted in some form since the year 2000, there is still a considerable amount of work needed in this area in order for the consolidation to continue and work effectively so that the District may be in compliance with the BEP. Leaders in both the District and the Town should be involved in and aware of the extent of consolidation between the School and Town finance functions and continually aware of the functioning of said type of system.

A potential indicator that the Finance Department does not have adequate resources allocated to it in the consolidated Finance Office, and a major cause of concern, is the lack of a strong projection on where the school department finances will end for FY18. At this date, nearly two (2) months after the end of the fiscal year, a projection, although unaudited, of the final fiscal standing of the School Department for FY18 should be available. Neither the Director of Administration/Finance Director for the Town/School, nor the Deputy Director of Administration for the school department, is able to produce this information. Financial analysis, discussed further in this report, is based upon an amended/revised budget report for FY18. Audit planning and scheduling should be well underway at this point as final audit financial statements are due to the Auditor General by December 31st of each year pursuant to Section G-15-2.3.2 of the BEP.

The School Department is also required to have a Uniform Chart of Accounts (UCOA) audit as part of the yearly financial statement audit. RIDE imposes reporting requirements on Districts for unaudited yearly actual reporting, as well as final audit reporting all within the timeframe between the end of the fiscal year and the end of the calendar year to meet state law reporting provisions. The inability of the school to provide this information notes a lack of appropriate School Department staffing to provide progress for reporting for the audit. It was noted that the FY17 Town of East Greenwich Auditor's Report was not issued until April 3, 2018, which represents a late filing date of three (3) months. Although the consolidated single audit report commendably showed no deficiencies in internal controls or material weaknesses, late

filing of financial statements on a continued basis is cause for concern. A properly functioning finance department is able to be prepared for the yearly audit on an on-going basis, with reconciliations and audit papers prepared monthly as transactions occur. Late audits and issuances of late financial statements is indicative of these recurring reporting and reconciliation reports not being completed until after year end, resulting in additional work for employees in order to back track to reconciling transactions that happened throughout the year, instead of continued oversight and analysis on an on-going basis.

Recommendation: The allocation of staff and duties between the District and the Town amongst personnel in the Finance Department be reviewed in order to ensure that the School Department's Finance Office has adequate staffing to meet the guidelines set forth in the BEP. Add staff to perform School Department functions as necessary.

Another cause for concern with respect to the Finance Department is that many other departments in the District noted that school department employees are given limited access to Munis modules, requiring additional work for processes that could be completed within the system. Tyler Technologies can provide an investment analysis of any or all functions of Munis and make recommendations on how to better utilize this very powerful and comprehensive software. While new modules do not necessarily have to be added to the current system, an in-depth review by experts in the software is highly recommended. A strong, efficient finance function is critical to the fiscal health of any city or town, whether or not the function is consolidated. Proper work flow and use of the available modules will be analyzed in an investment analysis and will provide beneficial information to all functions in the school and town.

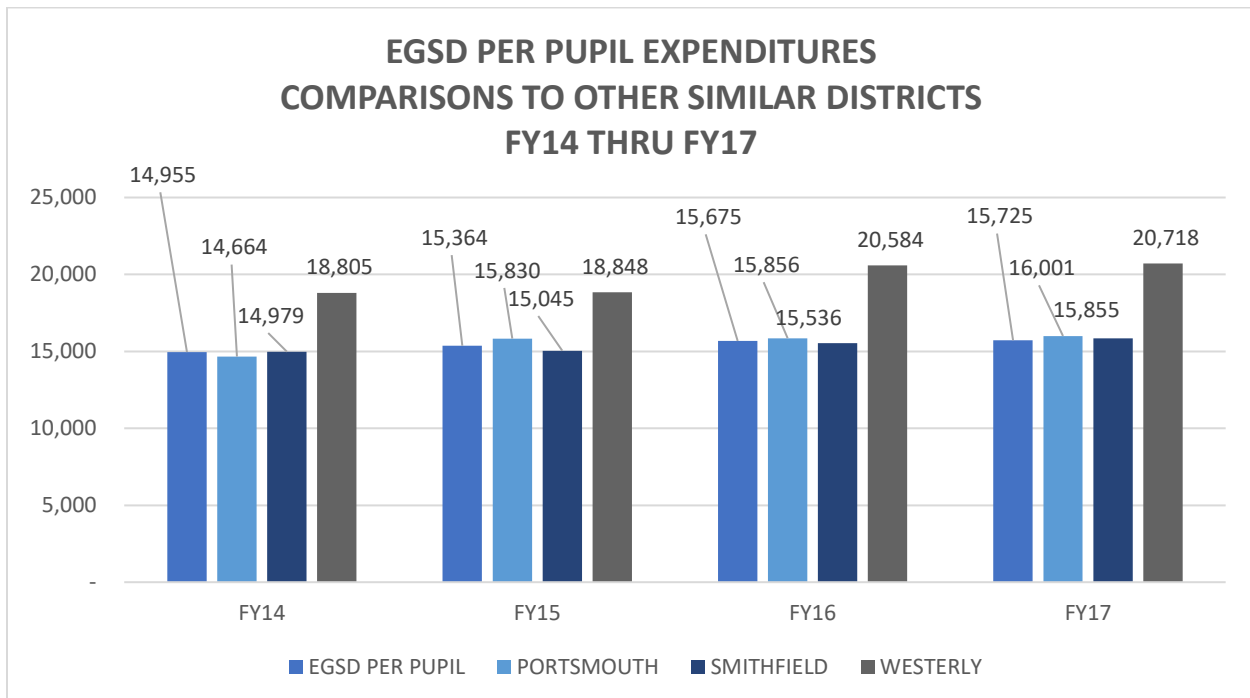
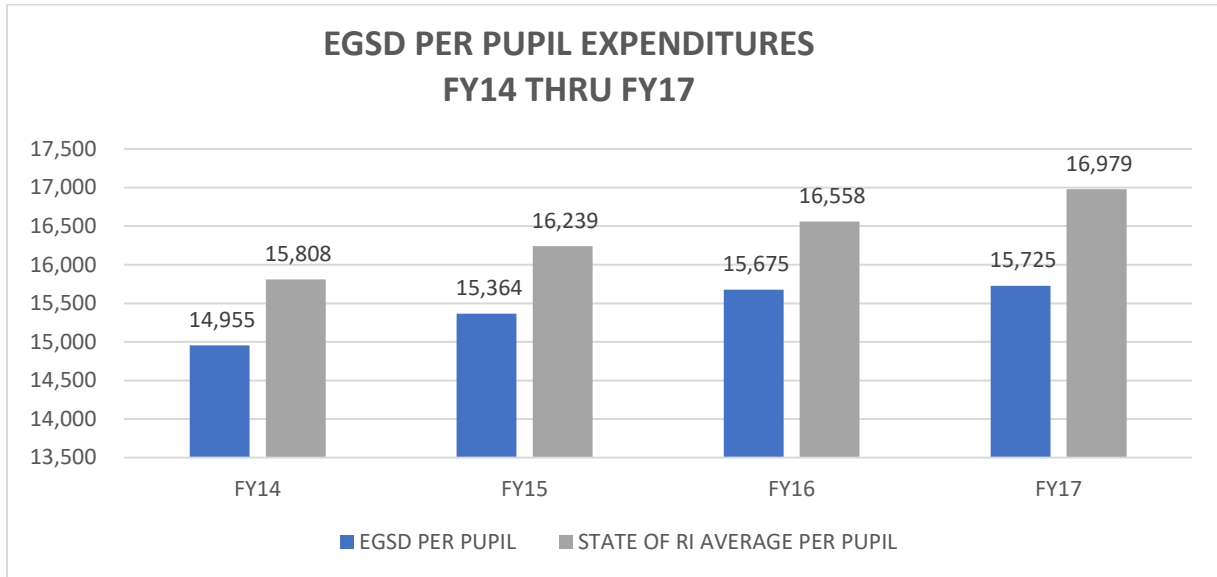
Recommendation: Undertake a full Munis investment analysis with Tyler Technologies.

The BEP specifically addresses the bidding process in Section G-15-2.3.1. It specifies that each LEA must develop “appropriate procedures and policies for procurement as well as for managing bids and contracts.”

In the District currently, a centralized purchasing function with proper bidding and proposal rules is missing in violation of Section G-15-2.3.1 of the BEP. While payables are consolidated, department heads appear to be the ones responsible for proper purchasing and bidding regulations based on Town Charter and state purchasing rules. There does not appear to be anyone in the Finance Office who is responsible for oversight of this function. As is the case with most school departments, these duties should be assigned within the Finance Office to the Deputy Director of Administration and all purchasing rules and regulations should be reviewed for adherence to town Charter/Code and state laws. A part-time Purchasing Agent for the school and town should be considered. This position should be considered for the FY20 budget in order to give the Town time to plan for the expense. This position could be valuable in terms of saving the town money by investigating shared purchasing opportunities and soliciting best pricing on more frequently purchased goods and services.

Recommendation: The School Department and Town hire a joint part-time Purchasing Agent in the Finance Office.

XI. BUDGETARY ANALYSIS



From a financial perspective, the District appears to have limited funding and limited resources. The District per pupil expenditure has fallen below other

comparable districts, such as Portsmouth and Smithfield and is significantly less than the RI State Average.

The District has filled holes in the general fund operating budget by using accumulated surpluses from several years ago, when the District was in better financial condition. However, this use of fund balance for recurring, operating general fund expenses is a red flag for the fiscal detriment of the district. Fund balance, or accumulated surplus, should be used ONLY for emergency or one-time funding of expenditures deemed necessary for the District, but that will occur only on a one-time basis; for example, building upgrades, professional consulting services for one-time information reports that are outside of the normal budget process or for unforeseen emergency items. If fund balance is used for a recurring, operational need, this should be done only with caution and the commitment to ensure that the following year's budget(s) can support the addition of the expenditure, otherwise a structural deficit is created, making it impossible for the District to sustain the expense without cuts or further deficits. It is recommended that the School Committee formulate a "Use of Fund Balance Policy" that not only identifies an amount of money to be held in reserve for emergency use only, but also that addresses the use of fund balance monies above and beyond this emergency level threshold.

Recommendation: The School Committee should formulate a "Use of Fund Balance Policy" that not only identifies an amount of money to be held in reserve for emergency use only, but also that addresses the use of fund balance monies above and beyond this emergency level threshold.

As FY18 projected actuals could not be provided, it is difficult to determine if budget issues exist in the FY19 budget. It is recommended that the FY19 budget be fully analyzed as soon as FY18 actuals are available to determine funding shortages. The earlier in the fiscal year that shortages are identified, the higher the likelihood that those shortages can be addressed before year end. Several accounts were identified as areas of question, such as health and dental expenditures, physical therapy, contracted nursing services, other technical services, mentoring, transportation, and property services. Information provided by the District regarding reasons for large variances appears reasonable. However, large decreases in expenditures, without certainty of sustainability, should be considered when the FY19 budget is once again reviewed.

One area of concern as noted above is the formula that will be forthcoming from RIDE regarding the required level of maintenance expenditures in order to continue to receive housing aid reimbursements. Once that guidance is provided, these accounts should be reviewed immediately for potential budget shortages.

XII. CONCLUSION

The Superintendent, his administrative team, the teachers, and the staff in the District must be commended for the high quality school system that they have been able to maintain with limited help and resources. However, the District is not adequately funded to be in compliance with state and federal law and the BEP. The District requires a minimum of **one million, two hundred and twenty two thousand (\$1,222,000)** in additional funding to gain said compliance.

APPENDIX - DEMOGRAPHICS

The Town of East Greenwich is a municipal entity located in Kent County, Rhode Island. It is geographically located in the middle of the state. East Greenwich has a land area of sixteen and thirty-nine hundredths (16.39) square miles.²⁴ Twenty percent (20%) of that land consists of undeveloped woods and farmland, although this number continues to decrease due to development.²⁵ Its population per square mile was eight hundred and one and nine tenths (801.9) as of 2010.²⁶

The United States Census Bureau estimates that the town had a population of thirteen thousand ninety-nine (13,099) people as of July 1, 2017.²⁷ As of the 2010 Census, there were five thousand twenty two (5,022 households), thirty-four and nine tenths of a percent (34.9%) of which had children under the age of eighteen (18) living with them.²⁸ The average household size was two and fifty-seven hundredths (2.57) and the average family size was three and one tenths (3.10).²⁹ The racial makeup of the town was ninety-three and two tenths of a percent (93.2%) White, eight tenths of a

²⁴U.S. Census Bureau (2010). *Quick Facts East Greenwich town, Kent County, Rhode Island*. Retrieved from <https://www.census.gov/quickfacts/fact/table/eastgreenwichtownkentcountyrhodeisland/PST045217>

²⁵ East Greenwich Land Trust (2010). *Trends & Future*. Retrieved from <https://web.archive.org/web/20130908154643/http://eglandtrust.org/trends.html>

²⁶ U.S. Census Bureau (2010). *Quick Facts East Greenwich town, Kent County, Rhode Island*. Retrieved from <https://www.census.gov/quickfacts/fact/table/eastgreenwichtownkentcountyrhodeisland/PST045217>

²⁷ U.S. Census Bureau (2017). *Quick Facts East Greenwich town, Kent County, Rhode Island*. Retrieved from <https://www.census.gov/quickfacts/fact/table/eastgreenwichtownkentcountyrhodeisland/PST045217>

²⁸ U.S. Census Bureau (2010). *Profile of General Population and Housing Characteristics: 2010 Demographic Profile Data*. Retrieved from <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

²⁹ U.S. Census Bureau (2010). *Profile of General Population and Housing Characteristics: 2010 Demographic Profile Data*. Retrieved from <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

percent (.8%) Black or African American, one tenth of a percent (.1%) American Indian or Alaska Native, four and one tenth of a percent (4.1%) Asian, one and seven tenths of a percent (1.7%) Hispanic or Latino, three tenths of a percent (.3%) Other Race and one and four tenths of a percent (1.4%) Two or More Races.³⁰

The age of the population in the town was spread out with twenty-eight percent (28%) aged nineteen (19) and younger, three and three tenths of a percent (3.3%) aged twenty (20) to twenty-four (24), nineteen and three tenths of a percent (19.3%) aged twenty-five (25) to forty-four (44), thirty-two and nine tenths of a percent (32.9%) aged forty-five (45) to sixty-four (64), and sixteen and five tenths of percent (16.5%) who were sixty-five (65) years of age or older.³¹ The median age was forty-four and six tenths (44.6) years.³²

In 2010, the median income for a household in the town was ninety-eight thousand sixty-three dollars (\$98,063), and the median income for a family was one hundred thirty thousand two hundred and twenty one dollars (\$130,221).³³ About two and five tenths of a percent (2.5%) of families and four and seven tenths of a percent (4.7%) of the population were below the poverty line, including four and one tenth of a

³⁰ U.S. Census Bureau (2010). *Profile of General Population and Housing Characteristics: 2010 Demographic Profile Data*. Retrieved from <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

³¹ U.S. Census Bureau (2010). *Profile of General Population and Housing Characteristics: 2010 Demographic Profile Data*. Retrieved from <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

³² U.S. Census Bureau (2010). *Profile of General Population and Housing Characteristics: 2010 Demographic Profile Data*. Retrieved from <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

³³ U.S. Census Bureau (2010). *Profile of General Population and Housing Characteristics: 2010 Demographic Profile Data*. Retrieved from <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

percent (4.1%) of those under age eighteen (18) and seven percent (7.0%) of those age sixty-six (66) or over.³⁴

In 2012-2016, according to the Rhode Island Department of Labor, the median family income was one hundred forty-two thousand six hundred forty-eight dollars (\$142,648); the highest in Rhode Island.³⁵

³⁴ U.S. Census Bureau (2010). *Profile of General Population and Housing Characteristics: 2010 Demographic Profile Data*. Retrieved from <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

³⁵ Rhode Island Department of Labor and Training (2012-2016). *Rhode Island City and Town Income American Community Survey Five Year Estimates*. Retrieved from <http://www.dlt.ri.gov/lmi/census/inc/towninc.htm>