

SPECIAL CIRCUMSTANCE

ON-SITE REVIEW REPORT

Pocahontas County High School

January 2025



Office of Accountability



**West Virginia Board of Education
2024-2025**

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Introduction

The West Virginia Department of Education (WVDE) conducted a Special Circumstance Review of Pocahontas County High School at the request of the county superintendent, beginning October 22, 2024, to examine compliance with laws and policies affecting student, school, and county performance and to verify data reported by the school. The review process was conducted as outlined in W. Va. Code §18-2E-5 and West Virginia Board of Education (WVBE) Policy 2322: West Virginia System of Support and Accountability. The review included interviews with school and central office personnel, a review of documents submitted to the Office of Accountability, classroom observations, and an analysis of student transcripts.

Onsite Review Team Members

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Background

Pocahontas County High School, located in Dunmore, WV, serves approximately 275 students in grades 9-12. In the spring of 2024, Superintendent Bostic contacted the WVDE to assist in reviewing the school's master schedule to inform staffing decisions. In August 2024, WVDE Office of PK-12 Academic Support personnel conducted training on WVBE Policy 2510 and master scheduling. Subsequent training sessions and discussions with school staff and county leadership revealed significant concerns with the school's master schedule, grade transcription processes, and counseling program. Recent personnel changes at the school include the hiring of a new principal in August 2024 and the retirement of the school counselor in September 2024. Despite multiple advertisements, a qualified replacement has not been found. In response, Superintendent Lynne Bostic requested the WVDE to conduct a third-party review of the school's procedures.

Focus Area 1: Comprehensive School Counseling Program (CSCP)

General Observations:

- At the time of the review, the school lacked a certified school counselor. After the previous counselor's retirement, the position was advertised multiple times, but no qualified candidate was found. WVDE personnel suggested creating a Dean of Students position to assist with transcription, scheduling, and personalized student planning.
- Interviews revealed that advisement, including helping students explore available services, set educational and career goals, select programs of study, and make course choices, has largely been handled by homeroom teachers. This process has not involved collaboration with the school counselor, families, or other stakeholders.
- There was no evidence of a collaborative approach to developing Personalized Education Plans (PEPs), as required by WVBE Policy 2510 and the West Virginia School Counseling Model, which outline grade-level expectations for PEP completion.

Points of Noncompliance:

NONCOMPLIANCE 1.1: An Annual CSCP Plan has not been developed to coordinate and implement a counseling program designed to address students' needs. The most recent CSCP plan was completed for the 2022-2023 school year. *WVBE Policy 2315, Section 2.1, Section 10.1*

CORRECTIVE ACTION 1.1: Annually develop a CSCP Plan to outline priority goals and strategies to attain those goals. The counselor, school leadership, and school counseling advisory council members should review relevant data to guide the development of the Annual CSCP Plan. This data will include the results of the CSCP Audit, the school counselor's self-reflection completed as part of the educator evaluation system, student and staff need assessments, and other school data. The Annual CSCP Plan must address the five school counselor performance standards and identify priority objectives to be addressed in each of the four program delivery systems.

NONCOMPLIANCE 1.2: At the time of the review, a process to develop student PEPs was not in place. PEPs are an essential component of developing a student-driven master schedule.

CORRECTIVE ACTION 1.2: The school principal, leadership team, and counselor or dean of students will ensure the creation and yearly review of the PEP with each student. Include academic offerings, career plans, students' interests, and other information to guide changes to course selections. School staff must ensure each PEP is reviewed annually in grades 9-12 with each student and his or her parents/guardians and document this review.

Focus Area 2: Grading, Transcribing, and Scheduling

General Observations:

- One staff member had been tasked with transcribing grades and inputting the master schedule into WVEIS. This staff member has received training consisting solely of video tutorials available online. The team determined the school principal and central office staff lacked the experience and expertise to effectively oversee these processes.
- Interviews confirmed the school's master schedule and individual student schedules were not prepared before the start of the school year. School staff indicated central office staff instructed them to stop working on the school schedule at the end of the 2023-2024 school year. WVDE staff offered to assist in preparing the master schedule. However, teachers and school administrators created the school schedule after students reported at the start of the school year.
- Review of WVEIS data revealed inconsistencies in course codes and naming of courses, creating potential issues with college admissions, scholarship applications, and collegiate athletic eligibility. Although students may have taken the correct courses, the inconsistencies in the naming and coding of those courses may impact the interpretation of the credits by other institutions.
- The new principal indicated she had requested access to the transcript-sharing platform. However, this had not been corrected at the time of an additional on-site visit on November 7, 2024.
- Throughout interviews, clear policies, and procedures to support accurate and timely grading practices were not evident. Teachers did not articulate a consistent process for making changes to grades once they have been transcribed. The absence of a clear and consistent process has created the potential for teachers to be influenced to change transcribed grades. Interview comments and evidence provided indicated that teachers may have changed transcribed grades based on pressure from parents and not because of a grading error. W. Va. Code §18-5-46 states, "No teacher may be required by a principal or any other person to change a student's grade on either an individual assignment or a report card unless there is clear and convincing evidence that there was a mathematical error in calculating the student's grade."
- Throughout interviews, staff expressed the school's approach to credit recovery has been insufficient to meet student needs. Staff members shared credit recovery concerns including conflicting guidance, a lack of communication, inaccurate or incomplete records, and poor instructional quality. Some student transcripts revealed they had been placed in credit recovery for courses they had already passed.

Points of Noncompliance:

NONCOMPLIANCE 2.1: Evidence indicates a student was transcribed inaccurate transfer credits. Interview comments and documentation suggest this may have been done intentionally and not as the result of a data entry error. Throughout the review process, other transcript errors were discovered. A lack of expertise in the correct use of the WVEIS platform to transcribe grades was evident. *WVBE Policy 2510, Sections 6; WVBE Policy 4350, Section 4.3; WVBE Policy 5902, Section 4.2.1*

CORRECTIVE ACTION 2.1: School administrators must verify and correct any transcript errors with support from the appropriate WVDE personnel. Central office personnel with support from WVDE must review staff member permissions on WVEIS and revoke permissions for personnel who have not been properly trained. Central office personnel and school administrators must attend training sessions provided by WVDE personnel. School administrators and teacher leaders will develop school procedures for the transcription of student credits.

NONCOMPLIANCE 2.2: Student PEP plans were not completed, and student schedules were not prepared in advance of the 2024-2025 school year. *WVBE Policy 2315, Section 5.4.a.4; WVBE Policy 2510, Section 6, Appendix D*

CORRECTIVE ACTION 2.2: School administrators will develop a process for completing student PEP plans and scheduling students within appropriate timelines with support from WVDE personnel.

NONCOMPLIANCE 2.3: The school principal could not release transcripts for prior graduates due to lack of system access. *WVBE Policy 5800, Section 4.2.a, Section 4.2.b*

CORRECTIVE ACTION 2.3: Central office personnel will ensure access is granted to the required systems for the principal to release transcripts and complete all necessary tasks.

NONCOMPLIANCE 2.4: No school policy exists for grade changes and one staff member informally made grade changes in the past based upon informal verbal or e-mail requests by administrators. There is no end of year checkout procedure at the school that requires an archive of grade records. *WVBE Policy 5800, Section 4, Section 5; W. Va. Code §18-4-46 (a)*

CORRECTIVE ACTION 2.4: School and county policies must be developed and implemented regarding the formal process and procedure for necessary grade changes, assuring compliance with W. Va. Code §18-5-46. School administrators will develop an end-of-year checkout procedure for teachers at the school that requires an archive of grade records. Central office staff will develop an end-of-year checkout procedure for principals to verify that teachers have archived grade records.

NONCOMPLIANCE 2.5: Students who successfully completed credit recovery continued to be enrolled in credit recovery. *WVBE Policy 2510, Section 6.4*

CORRECTIVE ACTION 2.5: School staff with assistance from appropriate WVDE staff will review credits on all student transcripts to ensure that students have credits properly recorded, verify if credit recovery was completed successfully, and unenroll/enroll students in credit recovery courses as needed.

Focus Area 3: Leadership

General Observations:

- The team experienced courteous and professional interactions with all interview participants. Staff willingly expressed a desire to improve processes at the school, and many specifically conveyed the potential for success that exists among the students and staff.
- Teachers consistently expressed confidence in the new principal. Even those who were dissatisfied with circumstances, such as the school schedule, did not assign blame to the principal and were complimentary of her efforts to begin establishing high expectations.
- Central office support for the principal has been inadequate to meet the needs of a beginning school leader and to ensure the overall success of the school. The principal requested a mentor and was provided with contact information for a consultant whose expertise does not align with the areas of support requested.
- During interviews, a culture of shared ownership for student success was not evident. Interview responses from staff members revealed the need for teachers, school leadership, and central office staff to assume greater responsibility for the effectiveness of the school's processes and instructional approach. While many interview respondents recognized problems existed, few articulated their own responsibility in providing a solution to those problems and instead assigned blame to others.
- Many interview responses indicated the school has been without a cohesive vision and focused mission for some time. In the absence of consistent communication and follow-through from school and central office leadership, schoolwide procedures to support efficient operations and effective instruction have not been implemented. The school would benefit from developing and reinforcing guidelines and expected protocols for common occurrences such as enrollment of a new student, disciplinary actions, grading, and scheduling to allow effective instruction to be prioritized.
- Staff members and leaders expressed the need for high quality professional learning in the areas of WVEIS, scheduling, transcripts, policy and procedure development, and leadership capacity. A lack of mentoring and support for principal leadership was also evident. Responses from staff members indicated that a chain of command is not followed and positive relationships between district leaders and school staff are not fully developed. The team found a pervasive lack of standard operating procedures, including end-of-year checkout procedures for teachers and administrators.
- The team discovered that district leaders do not visit schools on a regular basis. No evidence of instructional support and walkthrough visits was provided. Directors articulated multiple areas of responsibility and stated duties have been redistributed over the years as the number of central office leadership positions has been reduced.
- Several staff members shared concerns about retaliation and hostility from the central office in the past and many expressed feeling unsupported in their efforts to present scheduling options at the end of the 2023-2024 school year. After presenting scheduling options, teachers recalled receiving little additional communication from the central office and were eventually instructed to stop working on the schedule.
- In the absence of a comprehensive scheduling procedure, there was no master schedule ready prior to the first day of school. The school administrators and a team of teachers worked additional hours to create a master schedule and to schedule students in classes.

Points of Noncompliance:

NONCOMPLIANCE 3.1: Evidence, including the failure to provide an appropriate mentor, indicated a lack of support for the new principal by central office administrators. *WVBE Policy 5800, Section 4.2.e*

CORRECTIVE ACTION 3.1: The superintendent and central office leaders will provide a mentor for the principal at Pocahontas County High School.

NONCOMPLIANCE 3.2: The team determined a lack of a clear and focused learning mission. A comprehensive system of monitoring and support does not exist between district staff and school leadership. *WVBE Policy 5800, Section 4.2; WVBE Policy 2322, Section 7.1*

CORRECTIVE ACTION 3.2: The superintendent and central office leaders must communicate with each other and school administrators to establish a clear and focused learning mission based upon a model of continuous improvement.

NONCOMPLIANCE 3.3: Evidence from interview responses indicated a lack of communication between central office leaders, school administrators, and school personnel. *WVBE Policy 5800, Section 4.2*

CORRECTIVE ACTION 3.3: The superintendent and central office leaders must collaborate with each other and school administrators to establish a clear and focused learning mission based upon a model of continuous improvement.

Focus Area 4: Positive and Safe School Environment

General Observations:

- During the onsite visit, the team observed safe and appropriate student behavior. Positive interactions between students and staff members were evident.
- Interview respondents discussed that the school's current disciplinary protocol requires three interventions for behaviors, such as skipping class, before disciplinary referral to the office can be made. Several interview respondents attributed this to "a change in state policy." This is not a requirement of WVBE Policy 4373: Expected Behavior in Safe and Supportive Schools. Interview responses indicated a lack of communication of the process and applicable behaviors has led to inconsistent interpretation among staff members.
- During the first onsite visit which occurred on October 22, 2024, the principal relayed she did not have access to review the cameras in the special education classrooms, as required by policy and code. The principal stated she had made central office staff aware that she needed access to the system, which is kept under lock and key. The team mentioned this to the superintendent during the visit to the central office the following day and advised her to immediately reach out to the camera company to ensure the principal can comply with the requirements of policy and code. When the team returned nearly three weeks later, the principal still did not have access to the camera. She indicated the Director of Special Education had provided her with contact information for the camera company. The principal stated she had reached out to the camera company by email and by telephone and received no response.
- The School Crisis Prevention and Response Plan was submitted on time. However, after the Department of Homeland Security review, it was returned on August 13, 2024, for revision. As of October 22, 2024, the required corrections to the plan had not been submitted.
- During interviews, the team learned that the school secretary's computer was accessible to others during the school day. The secretary's WVEIS password was saved on the computer. This permitted anyone who entered the office the ability to access student records using the secretary's credentials.

Points of Noncompliance:

NONCOMPLIANCE 4.1: Implementation of the school's disciplinary protocols is not consistent schoolwide and may not provide appropriate interventions to support a positive and safe school environment. *WVBE Policy 4373, Chapter 4; PCS Policy 8402: Expected Behavior in Safe and Supportive Schools*

CORRECTIVE ACTION 4.1: The principal, with input from the leadership team and other stakeholders, shall develop, communicate, and monitor best practices and protocols to support safe and appropriate student behavior. Regularly review WVEIS school level discipline data with staff to determine effectiveness of interventions and areas for improvement of student behavioral support.

NONCOMPLIANCE 4.2: School access and security measures are insufficient to ensure the safety of the students within the school. *W. Va. Code §18-5-48; W. Va. Code §18-9F-1; WVBE Policy 8300*

CORRECTIVE ACTION 4.2: School administrators shall, with support from the central office, assess the safety and security of the school and make appropriate changes to current practices to ensure the security of the school building.

NONCOMPLIANCE 4.3: The School Crisis Prevention and Response Plan has not yet been revised and submitted for approval for the 2024-2025 school year. *W. Va. Code §18-9F-9; WVBE Policy 4373*

CORRECTIVE ACTION 4.3: School administrators shall revise and resubmit the School Crisis Prevention and Response Plan for further review by the Department of Homeland Security.

NONCOMPLIANCE 4.4: Student information was potentially accessible to unauthorized personnel based on unsecured access to the school secretary's computer and WVEIS credentials. *W. Va. Code §18-2-5h; WVBE Policy 4350, Section 4; WVBE Policy 2460, Section 4; PCS Policy 8305: Information Security*

CORRECTIVE ACTION 4.4: District technology staff shall conduct training with all school staff regarding network security procedures and protocols and require that computer systems be logged out or locked when unattended. This training is critical for school staff with access to WVEIS and student records. The county WVEIS contact shall restrict the permissions of the school secretary to view only access for student records, schedules, and contact information.

Focus Area 5: Special Education

General Observations:

Pocahontas County was designated as “Needs Assistance” for the Special Education indicator in the 2024 Approval Status and Accreditation Report compiled by the WVDE Office of Accountability. This designation requires the local educational agency (LEA) to develop and implement an action plan to address identified areas of deficiency. The LEA special education director is beginning her second year in that role. During the onsite visit, a small sample of student files and Individualized Educational Programs (IEPs) were reviewed. Based on the findings of this sample review, the team determined that multiple systemic issues may exist. Service verifications, annual review timelines, and standards-based IEPs were identified concerns. To ensure that LEA policies and procedures regarding the provision of special education services comply with state and federal regulations, the team recommends more comprehensive monitoring and review be completed by the WVDE Office of Special Education (OSE).

- During the second onsite visit, a WVDE OSE Coordinator reviewed and verified the accuracy of five student daily schedules. Three of these schedules were confirmed to be correct during the first period.
- During classroom visits to verify students’ daily schedules, it was observed that teachers were primarily assisting students as needed while the students engaged in independent work.
- Interview responses revealed that two teachers had switched teaching assignments during one class period without prior approval from the principal or updating the master schedule.
- Five service verifications were conducted to determine if IEPs were being delivered to the extent and frequency stipulated by the IEP Team. None of the reviewed IEPs verified. The verification process revealed that students were overserved by 320 minutes in a co-taught class. Overservice in the co-taught classroom indicates a special educator is available in the classroom for more minutes than an individual student’s IEP stipulates. This may not be a noncompliance if the teacher is in the room to provide support to other students. Additionally, indirect service logs and the speech service provider roster were not provided.
- The OSE completed IEP file reviews for five randomly selected students. The review identified systemic findings with less than 80% compliance and provided individual student corrections. It was discovered that IEPs are not being reviewed within 365 days of the previous IEP, and parents and students are not informed of the transfer of educational rights by the student’s 17th birthday.
- The OSE notes that IEP Teams determine students’ eligibility for the West Virginia Alternate Summative Assessment (WVASA) without utilizing the Eligibility Determination Checklist for Participation in the WVASA.
- There is a longstanding noncompliance related to secondary transition plans. However, the LEA is currently receiving support from a WVDE-contracted vendor to correct this as part of the Guideposts to Graduation initiative.
- During interviews, it was mentioned that a Multi-Tiered System of Support (MTSS) was not being implemented for students receiving D and F grades. Additionally, it was reported that a Student Assistance Team (SAT) was not in place. However, the director stated that the forms have been created for the SAT and some interviewees reported that SAT was primarily used for academic purposes. Therefore, it appears that SAT is being implemented to some degree in the LEA.

- It was discovered that student IEPs are not tailored to individual student needs. The team found that students with IEPs are all placed in the same math course.
- During interviews, it was reported that the staff were not aware of which students have 504 Plans.
- There are no procedures in place for transfer students, and they are not tagged in WVEIS. It was reported that it is difficult to receive student records, especially for those transferring from out-of-state.
- During the principal interview, it was reported that she does not have access to view self-contained video recordings/audio and audio recordings of the self-contained restrooms. Additionally, the self-contained restroom does not have a sign posted stating, "Pursuant to state law, this restroom is equipped with an audio recording device for the protection of the students."
- During interviews, it was unclear if student data is used during IEP Team meetings to determine a student's Least Restrictive Environment (LRE).

Points of Noncompliance:

NONCOMPLIANCE 5.1: Five IEPs were reviewed for service verification and zero verified. *WVBE Policy 2419, Chapter 5, Section 2.G*

CORRECTIVE ACTION 5.1: All student files determined to be noncompliant during this review must be corrected and submitted to the WVDE OSE by February 3, 2025. Three additional student IEPs of service verifications must be completed to document systemic correction of service verifications by April 4, 2025.

NONCOMPLIANCE 5.2: IEPs are not reviewed within 365 days. *WVBE Policy 2419, Chapter 5, Section 3.A*

NONCOMPLIANCE 5.3: Parents and students are not being informed by the student's 17th birthday of transfer of educational rights. *WVBE Policy 2419 Chapter 5, Section 1.F*

CORRECTIVE ACTION 5.2 and 5.3: All individual files and systemic issues must be corrected and submitted to the WVDE OSE by February 3, 2025. In addition, a random pull of three additional student files must be completed by April 4, 2025. The OSE shall conduct this file review to assess whether the LEA has systemically corrected all noncompliance of policies, practices, and procedures. Any noncompliant files identified during additional pulls of data to verify systemic correction must also be corrected and new data pulls continue to be scheduled until the OSE can verify that the LEA is following policies, procedures, and practices as specified in state and federal regulations.

NONCOMPLIANCE 5.4: At the time of the review, the principal did not have access to the self-contained video recording device or the audio-recording device in the restroom of the self-contained classroom. The restroom door of the self-contained classroom did not have a notice stating it is equipped with an audio recording device. *W. Va. Code §18-20-11; WVBE Policy 2419, Chapter 5, Section 2.J; PCS Policy 7440.01*

CORRECTIVE ACTION 5.4: The LEA must coordinate with the WVDE OSE to schedule a focused training with appropriate personnel to address W. Va. Code §18-20-11, specifically addressing who is the custodian of the video camera and audio recording devices in a self-contained classroom. This training must be completed by March 7, 2025. In preparation for a collaborative virtual meeting, in which the WVDE OSE will provide technical support to ensure compliance with W. Va. Code §18-20-11, the LEA must submit copies of all documents that are disseminated to parents and/or guardians as well as staff related to the use of video cameras required in certain special education classrooms and audio recording devices required in the restroom of a self-contained classroom by February 3, 2025.

NONCOMPLIANCE 5.5: At the time of the review, the school did not have a Student Assistance Team (SAT) established to support student success. *WVBE Policy 2419, Chapter 2, Section 3*

CORRECTIVE ACTION 5.5: Submit evidence of an established school-based Student Assistance Team (SAT) by March 7, 2025. According to *WVBE Policy 2419, Chapter 2, Section 3.C*, and meet regularly to conduct the problem-solving process for an individual student whose academic, mental health, or behavior struggles are impeding their success in the school environment. Ensure that the SATs receive comprehensive training in referral procedures for multidisciplinary evaluations, Multi-Tiered System of Supports (MTSS), alternative education placements, disciplinary procedures, and other school and district processes as appropriate for ensuring student progress. Ensure the SAT follows the procedures for written referrals described in *WVBE Policy 2419, Chapter 2, Section 3.D*.

NONCOMPLIANCE 5.6: There are no procedures to ensure special education services are in place for transfer students. *WVBE Policy 2419 Chapter 5, Section 4.B*

CORRECTIVE ACTION 5.6: LEA schools must develop and implement an internal procedure for transfer students. Evidence of this internal procedure must be submitted to the OSE by March 7, 2024. The internal procedure must include documentation of the request for records and supporting documents from the previous Local Educational Agency (LEA) within two school days. The LEA must make a reasonable effort to ensure that special education services are in place for transfer students in compliance with Policy 2419.



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