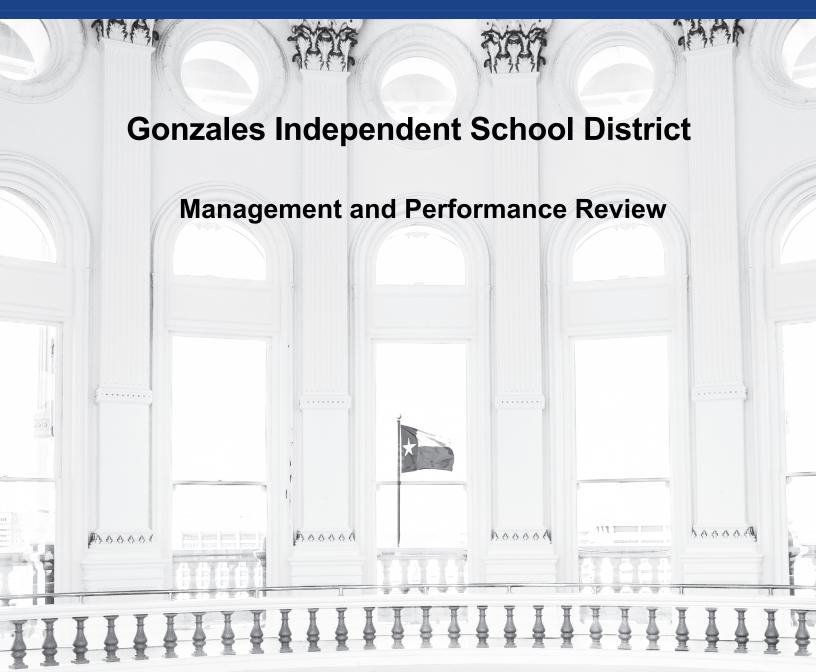


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DECEMBER 2020

Gonzales Independent School District

Management and Performance Review

PREPARED BY LEGISLATIVE BUDGET BOARD STAFF

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DECEMBER 2020



LEGISLATIVE BUDGET BOARD

Robert E. Johnson Bldg. 1501 N. Congress Ave. - 5th Floor Austin, TX 78701 512/463-1200 Fax: 512/475-2902 http://www.lbb.state.tx.us

December 29, 2020

Mr. John Schumacher Superintendent Gonzales Independent School District

Dear Mr. Schumacher:

The attached report reviews the management and performance of Gonzales Independent School District's (ISD) educational, financial, and operational functions.

The report's recommendations will help Gonzales ISD improve its overall performance as it provides services to students, staff, and community members. The report also highlights model practices and programs being provided by Gonzales ISD.

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address these areas promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review these areas to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board engaged Broaddus and Associates, Lloyd Smith & Associates, The Learning Collective, and Alvarez and Marsal to assist LBB staff to conduct and produce this review.

The report is available on the LBB website at http://www.lbb.state.tx.us.

Respectfully submitted,

Jerry McGinty Director

Legislative Budget Board

cc: Glenn Menking

Josie Smithy-Wright

Sue Gottwald

Gloria Torres

Justin Schwausch Ross Hendershott III Sandra Gorden

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EXECUTIVE SUMMARY

The Legislative Budget Board's (LBB) School Performance Review Team visited the Gonzales Independent School District (ISD) in March 2020.

The review team identified 45 significant findings and recommendations in four major categories based upon the analysis of data and the onsite observation of the district's educational, financial, and operational services and programs. Some of the recommendations are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards or accepted best practices, and the district should review these recommendations to determine the level of priority, appropriate timeline, and method of implementation.

FINDINGS AND RECOMMENDATIONS

This review summarizes the review team's findings and recommendations in each of the following major categories:

- (1) Planning;
- (2) Implementation;
- (3) Student Services; and
- (4) Accountability.

PLANNING

Planning is an ongoing and essential process employed by effective organizations. It enables an organization to identify long-term needs, to allocate the best use of resources, and to implement stakeholder goals. Gonzales ISD has not focused on planning to help guide the district and implement goals relating to the overall direction of the organization, long-term financial planning, hiring and staff recruitment, and facilities and technology planning.

Gonzales ISD has not developed a long-term strategic plan for the district. The district develops a district improvement plan and campus improvement plans, but these plans each cover a one-year period. The absence of a detailed and long-term strategic plan can result in a lack of board accountability and oversight. This lack of oversight can affect student outcomes and the ability to improve student achievement and district performance negatively. Without a comprehensive strategic plan, the district may react to administrative,

operational, and academic challenges annually rather than plan systematically through a well-defined process. By developing a long-term strategic plan, Gonzales ISD can determine a shared vision for the future and structure its instructional programs, operations, technology, safety and security, and facility programming to meet the needs of its students and community.

Gonzales ISD lacks a long-term financial planning process. The district's uses two resources for financial planning. One is the annual budget that estimates the revenue and expenditures to fund Gonzales ISD's campuses and departments annually. The other is a spreadsheet, developed by the chief financial officer, of long-term economic projections for the district. The superintendent and two board members reviewed the spreadsheet. However, this document has not been reviewed by campus administrators, department heads, or the entire board. At the time of the onsite visit, the spreadsheet was not used to inform the district's budgetary decisions. Using only these two resources does not effectively connect spending to longterm district priorities. A multiyear financial plan can help the district assess revenue trends, expenditure commitments, financial risks, and the affordability of additional services and capital investments.

Effective planning is critical to manage staffing, the district's largest expenditure. The district lacks a formal recruitment plan or focused recruiting strategies. Inability to fill district positions with qualified staff can reduce educational and operational effectiveness and efficiency. Developing a formal recruiting and retention plan would help Gonzales ISD implement and improve its educational programs and retain the experienced educators necessary to provide quality instruction to its students.

Planning for facilities is a priority for an efficient district. Gonzales ISD does not plan for facilities management and future facility needs. The district has not developed a facilities plan to guide the Operations Department, and the maintenance of facilities is performed by following an informal checklist of items to be fixed. This informal process does not assist the district to anticipate and budget for large repairs or replacement costs on an ongoing basis. Establishing a long-range facility master plan and preventive maintenance plan will enable the district to establish purpose, direction,

and priorities regarding facilities management and will assist the district to utilize assets more effectively.

Gonzales ISD's Technology Department does not does not follow a comprehensive technology planning process based on identified needs and goals. The department does not have a current needs assessment that would enable the district to assess its overall technology needs. Additionally, budget allocations for technology are based on historical funding, not on any long-term department goals or formal assessment of the district's technology needs. The Technology Department also does not have a long-range plan for replacing equipment or budgeting for new equipment.

The following recommendations would assist the district's planning:

- develop and implement a three-year to five-year comprehensive strategic plan with measurable goals to align all areas of district operations and serve as a framework for district decision making;
- · develop and implement a long-term financial plan;
- develop a targeted recruitment and retention plan for the district;
- develop a comprehensive long-range facilities master plan that includes an annual facilities audit and ongoing preventive maintenance program; and
- develop and implement a comprehensive technology plan.

IMPLEMENTATION

Implementation of plans is critical for an organization to achieve stated goals and desired outcomes. School districts implement educational programs and operational plans to meet the needs of students. Gonzales ISD lacks efficient implementation of programs and services in five key areas. Two functional areas involve the implementation of educational programs, and three areas involve district operations.

Gonzales ISD has not defined the roles for the district's instructional officers clearly. A large focus of instructional officers' responsibilities is on assessment and administrative duties, which reduces the time available for them to support instructional coaches on campuses. By defining and implementing roles and responsibilities, delineating a clear reporting structure, and setting objectives and obtainable goals, the Curriculum and Instruction Department can meet students' needs better and support teachers.

The district does not have a formal instructional resources and materials adoption process, timeline, or adoption committee. The school year 2018–19 English literacy instructional resource was adopted following a curriculum and instruction staff decision that had minimal input from teaching staff or campus leadership. Without an instructional resources and materials selection committee to evaluate the rigor of instructional resources and materials, staff cannot ensure that students receive quality instruction. Implementing a formal instructional resources and materials adoption process that involves all stakeholders will help the district meet students' needs and support academic instruction more effectively.

District staff do not use the district's official mass communication tool consistently to convey news of critical incidents. Many staff have not installed the communication application on their mobile phones. Lack of awareness during an emergency could result in a situation wherein one campus does not take proper precautions in response to an incident in the district. By implementing a designated, centralized mass communication system and requiring all staff to use it, the district will increase coordination across all campuses to safeguard students and staff.

Gonzales ISD has not implemented a system to optimize its bus routes and schedules. Although the district's transportation software package has route optimization features, the Transportation Department has not implemented these features. By regularly reviewing and optimizing the process for routing and scheduling, the district can evaluate if it is providing the safest, most effective transportation services to students and making the best use of district funds.

The district is not implementing its breakfast and lunch program efficiently. Compared to peer districts, Gonzales ISD has low meal participation rates for both breakfast and lunch meals. Peer districts are districts of similar size compared to Gonzales ISD. The Nutrition Services Department is not testing its meals with students and lacks proper meal preparation and presentation. By providing popular meal items that are prepared and presented well, the district can increase breakfast and lunch participation during the next five years, resulting in an annual gain of \$43,919.

The following recommendations would assist the district's implementation processes:

 evaluate the roles and responsibilities of staff in the Curriculum and Instruction Department to support academic instruction more effectively;

- develop an adoption process for instructional resources and materials that includes staff and parent input, adoption timelines, and adequate training;
- enforce the use of the designated mass communication tool to inform district staff of critical incidents, implement training in its use, and verify that all district staff have installed the application on their mobile telephones;
- evaluate bus routes and schedules, fully implement the district's transportation software, and schedule periodic reviews and updates; and
- develop a meal preparation, promotion, and presentation program that appeals to students and encourages meal participation.

STUDENT SERVICES

Gonzales ISD has not adopted strategies to ensure the efficient delivery of programs and services. Programs either are not provided to students effectively or are implemented inconsistently across campuses. Although principals determine the levels of programs and services on their campuses, limited coordination exists to ensure that students are receiving the appropriate level of support. Students who need more attention from the district include students with behavior incidents, English learners (EL), and students receiving special education services. In addition, students accessing the technology and receiving the benefits provided by the Gonzales ISD Education Foundation have not been prioritized appropriately in the district.

The district does not implement its behavior management model effectively, and staff do not receive behavior management training consistently throughout the district. Implementing training and a consistent behavior management model will enable staff to redirect struggling students more quickly to improve their academic success. Addressing student behavior issues consistently across campuses improves the quality of instruction received by all students, including those who are not misbehaving.

The district's English as a second language and bilingual instruction are not supported equitably, limiting EL students' academic growth. The district does not provide adequate Spanish-language reading materials for its EL students, which negatively affects student instruction. By not providing adequate resources, including a comprehensive instructional resource, necessary materials, and certified staff, the district is

not implementing its dual-language model effectively to prepare EL students for English-only instruction.

Special education students do not receive adequate instructional support. Each campus principal determines the supporting services that students receive, resulting in inconsistent practices across campuses in the district. The district aims to support special education students by keeping them in the classroom with their peers as much as possible. However, staff reported that not all campus staff are supportive of the inclusive co-teaching model. Additionally, during onsite interviews, staff said that students served by special education are not receiving the support they need due to limited staffing at some campuses.

Gonzales ISD students attend a different campus every two years during the pre-high school grades, and each principal determines instructional delivery on the campus, resulting in inconsistent implementation of the district's instructional model. With consistent and effective principal collaboration, instructional delivery and student achievement can improve.

The Technology Department lacks a method to determine the appropriate staff and organizational structure to provide the most efficient and effective customer support. Integrating trained technology support specialists into classrooms will help to ensure that Gonzales ISD students have access to technology and instruction that will help them succeed.

The district does not manage the Gonzales ISD Education Foundation, but its work benefits students and teachers. The organization does not publicize adequately the funds available for programs and initiatives on campuses. Teachers are not connected directly with the program that enables them to apply for available foundation funds. By diversifying the methods of fund distribution and improving teachers' understanding and accessibility of the application process, the district will help to ensure that foundation funds are deployed to provide maximum support for learning and programs on campuses.

The following recommendations would assist the district in providing services to students:

- provide staff with continuous training on the district's behavior management model and monitor for implementation;
- research dual-language, one-way models and evaluate additional district needs to ensure that the model selected is implemented with fidelity;

- evaluate the effectiveness of the district's special education program, including staffing and instructional delivery;
- provide ongoing training to principals and teachers on the district's response to intervention model;
- reorganize and supplement technology staffing to provide efficient coordination and support of technology use districtwide; and
- assist teachers to access Gonzales ISD Education Foundation funds efficiently and expand the availability of raised funds.

ACCOUNTABILITY

Effective and efficient public school districts have measurable performance metrics to hold administrators and staff accountable for achieving goals. Gonzales ISD has not developed systems for holding departments accountable in the areas of asset management, budgets and strategic plans, transportation, safety and security, and nutrition services.

Gonzales ISD does not manage or track all district assets effectively. The district tracks a small number of larger or high-value items, but the process is not comprehensive, and district staff do not perform an annual inventory.

The district does not link improvement plans to the budget to hold administrators and staff accountable for obtaining program goals. The board often adopts the budget before the development of improvement plans are completed. Making budgetary decisions that are not driven by the student performance goals outlined in campus and district improvement plans could lead to inefficient and ineffective spending.

The Transportation Department has not developed management reports with metrics or standardized reporting elements and does not use industry benchmarks to assess its effectiveness. Various strategies to increase accountability, which include establishing performance measures, communicating them to all stakeholders, and regularly comparing actual performance against the selected benchmarks.

The district does not have a districtwide, consolidated procedures manual with standard safety and security procedures. Without such procedures, Gonzales ISD risks having inconsistent district practices to ensure a safe environment.

The Nutrition Services Department operates without substantial planning. The department does not have plans regarding capital equipment or goals. Additionally, the department's expenses have exceeded revenues for the past two school years and the department does not use financial statements to guide decision making.

The following recommendations would assist in providing accountability in the district:

- develop and implement a comprehensive assets management system to identify, record, inventory, and track the district's fixed assets:
- develop and implement a budget development process that aligns with campus and district improvement plans;
- develop and report regularly on performance metrics for the Transportation Department;
- review and consolidate existing safety and security procedures into a districtwide operating procedures manual to guide safety and security operations in the district; and
- develop a long-range planning system for the Nutrition Services Department that includes regular financial and capital needs planning discussions.

ACCOMPLISHMENTS

During the course of its review, the LBB's School Performance Review Team has identified noteworthy accomplishments resulting from the district's best practices. Subsequent chapters discuss nine district accomplishments, including the following practices.

BOARD ENGAGEMENT

Each board member adopts a school campus to promote board accessibility, visibility, and connection to the campus community. Board members are encouraged to attend the events for their assigned campuses and to visit the campuses and interact with the staff. Board members reported that their presence and interaction have been well received and provide a connection to the issues and challenges at the campus level in the district.

STAFF ACCESSIBILITY

Administrative staff regularly visit campuses to provide Central Office support and transparency. Interviews of administrative staff revealed an intentional effort to improve their accessibility to the campuses. Staff visit campuses at least weekly to understand the challenges at the campuses and to determine ways to develop efficiencies across the district. A result of the process is that district administration is more visible on campuses and more accessible to the campus staff.

FINANCIAL OVERVIEW

House Bill 3, Eighty-sixth Legislature, 2019, made significant changes to the Foundation School Program (FSP). The legislation affected Gonzales ISD's entitlement, which is used to calculate the amount of state aid the district receives, and the calculation of the district's recapture payment. Two of the major drivers of FSP entitlement to a school district include the district's student population and its property values. During school year 2018-19, Gonzales ISD had an average daily attendance (ADA) of 2,609 students. During the same period, Gonzales ISD's property value used to calculate FSP entitlement was \$1,372,136,905. During school year 2017-18, Gonzales ISD had an ADA of 2,769 students. During the same period, Gonzales ISD's property value used to calculate the FSP entitlement was \$1,321,947,088. Gonzales ISD's maintenance and operation (M&O) tax rate increased from \$1.04 per \$100 of property valuation during school year 2017-18 to \$1.13 for school year 2018-19.

During school year 2018–19, Gonzales ISD was subject to a recapture payment of \$115,236.

Pursuant to House Bill 3, Gonzales ISD's M&O tax rate decreased from \$1.1324 per \$100 of property valuation to \$1.0369 for school year 2019–20. Pursuant to the legislation, the LBB estimates that Gonzales ISD will receive an increase of \$2,927,339 in total state and local revenue for school year 2019-20 and can expect an increase of \$3,054,901 in total state and local revenue for school year 2020-21 compared to what the district otherwise would have received. Before House Bill 3 was enacted, Gonzales ISD was estimated to have a recapture payment of \$98,426 for school year 2019-20 and \$143,863 for school year 2020-21. Pursuant to the legislation, the LBB estimates that the district will not be subject to recapture for school years 2019-20 and 2020-21. Included in these amounts is an estimated \$319,857 in state funding attributable to the transportation allotment for school year 2019-20, an increase of \$113,157 compared to what the district would have received in accordance with the previous formula.

Senate Bill 11, Eighty-sixth Legislature, 2019, addressed school safety measures and standards, including the

development of the school safety allotment that provides \$9.72 per student in ADA to improve school safety and security. Gonzales ISD is estimated to receive an additional \$27,131 for school year 2019–20 through this allotment.

For school year 2018–19, Gonzales ISD adopted a budget of \$23,708,776. The district's total actual expenditures were approximately \$22,963,631. Gonzales ISD's actual operating expenditure per pupil during school year 2018–19 was \$8,032, compared to the state average of \$9,913. During school year 2018–19, Gonzales ISD spent approximately 51.4 percent of total actual operating expenditures for instruction, compared to the state average of approximately 56.1 percent. The instructional expenditures percentage was calculated using the district's total actual operating expenditures that funded direct instructional activities, including the following functional categories: instruction; instructional resources and media sources; curriculum development and instructional staff development; and guidance, counseling, and evaluation services.

Gonzales ISD's School Financial Integrity Rating System of Texas rating was A/Superior for school year 2018–19. The district received a Smart Score of 2, with an academic performance rating of Very Low Academic Progress and an Average spending rate for school year 2018–19.

EDUCATIONAL OVERVIEW

During school year 2018–19, Gonzales ISD's enrollment was 2,859 students, served by 182.1 full-time-equivalent teacher positions. The district operates six campuses, including one early education prekindergarten campus, two elementary school campuses, an intermediate school campus, one junior high school, and one high school. During school year 2018–19, the student population in Gonzales ISD was 66.7 percent Hispanic, 24.9 percent White, 7.8 percent African American, 0.2 percent two or more races, 0.2 percent Asian, 0.1 percent American Indian, and 0.1 percent Pacific Islander.

The Texas Education Agency (TEA) issues state accountability ratings for each district and campus. From school years 2016–17 to 2018–19, TEA issued Gonzales ISD a district accountability rating of Met Standard, followed by letter ratings of F and B. Gonzales ISD received an overall accountability rating of B for school year 2018–19, during which academic achievement varied among campuses, ranging from a C at Gonzales High School, Gonzales Junior High School, and Gonzales North Avenue Intermediate School, to a D at both elementary schools and the prekindergarten campus.

FIGURE 1
GONZALES ISD ACCOUNTABILITY RATINGS
SCHOOL YEARS 2016–17 TO 2018–19

DISTRICT/CAMPUS	2016–17	2017–18 (1)	2018–19 (2)
District	Met Standard	F	В
Gonzales High School	Met Standard	Improvement Required	С
Gonzales Junior High School	Met Standard	Met Standard	С
Gonzales North Avenue Intermediate School	Met Standard	Met Standard	С
Gonzales Elementary School (3)	Met Standard	Improvement Required	D
Gonzales East Avenue Primary School (3)	Met Standard	Improvement Required	D
Gonzales Primary Academy (3)	Met Standard	Improvement Required	D

Notes:

- (1) The Texas Education Agency (TEA) changed the district accountability score to a letter grade during school year 2017–18.
- (2) TEA implemented accountability scores of letter grades for campuses during school year 2018–19.
- (3) Gonzales Elementary School, Gonzales East Avenue Primary School, and Gonzales Primary Academy are rated in conjunction and receive the same accountability score.

SOURCE: Texas Education Agency, Texas Academic Performance Report and School Report Card, school years 2016–17 to 2018–19.

Figure 1 shows the state accountability ratings for Gonzales ISD's campuses from school years 2016–17 to 2018–19. Gonzales ISD's accountability ratings decreased from school years 2016–17 to 2017–18. The district overall improved from school years 2017–18 to 2018–19; however, three of its campuses received accountability ratings of D for school year 2018–19.

Figure 2 shows various academic measures of Gonzales ISD compared to the average of other school districts in regional Education Service Center (ESC) Region 13 and the state. Gonzales ISD's academic performance is less than regional and state averages in all measures.

LBB SCHOOL PERFORMANCE REVIEW BACKGROUND

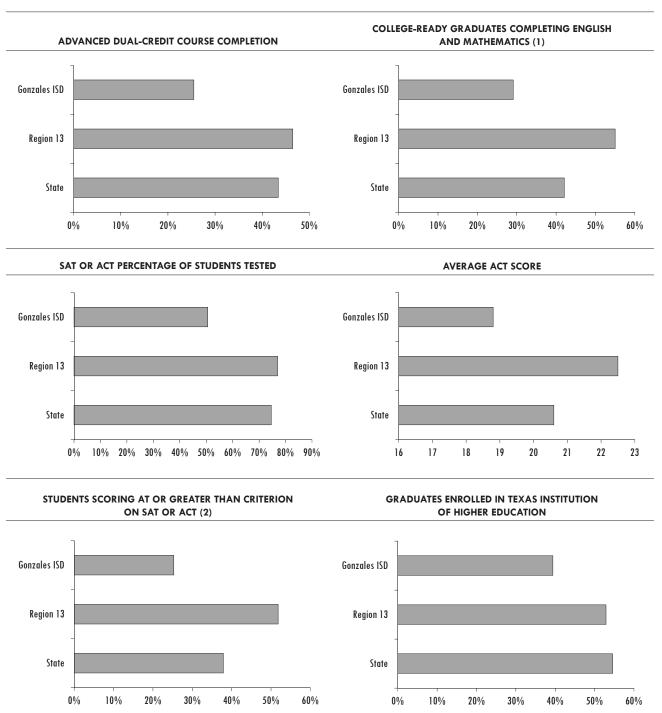
The Legislature established the Texas School Performance Review in 1990. The Texas Government Code, Section 322.016, states that the review's purpose is to "periodically review the effectiveness and efficiency of the operations of school districts, including the district's expenditures for its officers' and employees' travel services. A review of a school district may be initiated by the board at its discretion or on the request of the school district. A review may be initiated by a school district only by resolution adopted by a majority of the members of the board of trustees of the district. If a review is initiated on the request of the school district, the district shall pay 25.0 percent of the cost incurred in conducting the review."

The LBB's School Performance Review Team conducts comprehensive and targeted reviews of school districts' and charter schools' educational, financial, and operational services and programs. The review team produces reports identify accomplishments, findings, recommendations based upon the analysis of data and onsite study of each district's operations. A comprehensive review examines 12 functional areas and recommends ways to decrease costs, increase revenues, reduce overhead, streamline operations, and improve the delivery of educational, financial, and operational services. School districts typically are selected for management and performance reviews based on a risk analysis of multiple educational and financial indicators. The LBB also considers requests for reviews.

To gain an understanding of the school district's operations before conducting the onsite visit, the review team requests data from the district and multiple state agencies, including TEA, the Texas Department of Agriculture, and the Texas School Safety Center. For the Gonzales ISD review, LBB staff implemented additional methods for obtaining feedback on district operations, including surveys of parents and district and campus staff. While onsite, the review team gathered information through multiple interviews and focus groups with district and campus administrators, staff, and board members.

Gonzales ISD is located in Gonzales. The district is served by ESC Region 13, located in Austin. The state legislators for the district are Senator Lois Kolkhorst and Representative John Cyrier.

FIGURE 2
GONZALES ISD STUDENT ACADEMIC MEASURES COMPARED TO REGIONAL EDUCATION SERVICE CENTER XIII (REGION 13)
AND STATE AVERAGES, SCHOOL YEAR 2018–19



Notes:

- (1) To be considered college-ready, a graduate must have met or exceeded the college-ready criteria on the Texas Success Initiative Assessment or the SAT or ACT standardized college admissions tests.
- (2) Criterion refers to the scores on the SAT and ACT college admissions tests. For these tests, the criterion scores are at least a composite 24 on the ACT and at least 1110 total on the SAT.

Source: Texas Education Agency, Texas Academic Performance Report, school year 2018–19.

The following chapters summarize the district's accomplishments and the review team's findings and numbered recommendations. Detailed explanations for the accomplishments and recommendations include estimated fiscal impacts. Each chapter concludes with fiscal data, when appropriate, showing the chapter's recommendations that have estimated savings or costs for school years 2020–21 to 2024–25.

Figure 3 shows the estimated fiscal impact of all 45 recommendations included in the performance review.

The district should determine the actual fiscal impact after reviewing the recommendations to determine the level of priority, appropriate timeline, and method of implementation.

FIGURE 3
GONZALES ISD FISCAL IMPACT OF RECOMMENDATIONS, SCHOOL YEARS 2020–21 TO 2024–25

IMPACT	2020–21	2021–22	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
Gross Savings	\$43,919	\$43,919	\$43,919	\$43,919	\$43,919	\$219,595	\$13,000
Gross Costs	(\$54,976)	(\$54,976)	(\$54,976)	(\$54,976)	(\$54,976)	(\$274,880)	(\$24,000)
Total	(\$11,057)	(\$11,057)	(\$11,057)	(\$11,057)	(\$11,057)	(\$55,285)	(\$11,000)

1. DISTRICT ORGANIZATION AND GOVERNANCE

Gonzales Independent School District (ISD) is located in Gonzales in Gonzales and Caldwell Counties. During school year 2019–20, Gonzales ISD had 2,859 students. A sevenmember Board of Trustees (board) governs Gonzales ISD. The community elects the seven members in single-member districts with staggered three-year terms.

ACCOMPLISHMENTS

- Each board member adopts a campus to promote board accessibility, visibility, and connection to the campus community.
- ◆ Administrative staff regularly visit campuses to provide central office support and transparency.
- ♦ The superintendent's initiatives have improved and enhanced the Gonzales ISD culture.

FINDINGS

- Gonzales ISD has not developed a planning process to guide the district.
- Gonzales ISD does not manage its board policies and operating procedures actively.
- ♦ Gonzales ISD's Board of Trustees lacks a structure to hold the superintendent accountable for advancing student achievement and ensuring the district's efficient operation.
- Gonzales ISD does not train and orient new board members consistently.

RECOMMENDATIONS

- Recommendation 1: Develop and implement a three-year to five-year comprehensive strategic plan with measurable goals to align all areas of district operations and serve as a framework for district decision making.
- ♦ Recommendation 2: Establish a timeline and framework to review and update board policies and operating procedures systematically.
- ♦ Recommendation 3: Develop annual, measurable objectives and an aligned evaluation instrument to manage the superintendent's performance.

♦ Recommendation 4: Develop a formal orientation and training process for new board members.

BACKGROUND

An independent school district's governance structure, staff management, and planning process provide the foundation for effective and efficient education of students. The Gonzales ISD Board of Trustees focuses on decision making, planning, and providing resources for achieving goals. The board sets goals, objectives, and policies and approves plans and funding necessary for school district operations. The superintendent implements policy, manages district operations, recommends staffing levels, and allocates the resources to implement district priorities. The board and superintendent collaborate as a leadership team to meet district stakeholder needs.

John Schumacher began serving as Gonzales ISD's superintendent in school year 2019–20. The superintendent reports to the board. Eight staff and six campus principals report directly to the superintendent.

Figure 1–1 shows Gonzales ISD's board members. Six of the seven board members have served the district for 10 or more years. Gonzales ISD's board unanimously voted to postpone the May 2, 2020, school board election to November 3, 2020, to help reduce the possibility of exposure to COVID-19. One of the three seats open for election, District 5, will be contested in the November 2020 election. Since the time of the review, the district cancelled the election because the individual opposing the District 5 incumbent moved and was no longer eligible to run for the position.

The district complies with the Texas Open Meetings Act, the Texas Government Code, Chapter 551, by conducting monthly public board meetings facilitated by the board president. Staff display public notification outside of the central office building and on the district's website. The board addresses personnel matters and other confidential topics in closed sessions, as needed. The board secretary records minutes, and the board approves them at the following board meeting.

The board's policies, which are posted on the district's website, guide the district's operation. **Figure 1–2** shows the district organization of Gonzales ISD.

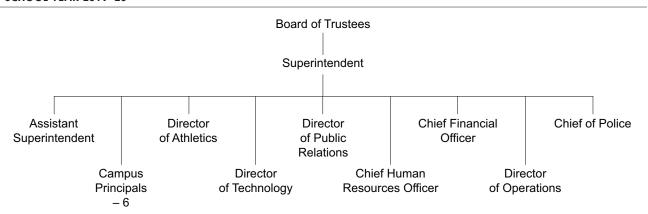
FIGURE 1–1
GONZALES ISD BOARD OF TRUSTEES
SCHOOL YEAR 2019–20

NAME	TITLE	TERM EXPIRATION	YEARS OF SERVICE (1)	OCCUPATION
Glenn Menking	President/District 3	2020	18	Banker
Gloria Torres	Vice President/District 1	2022	37	Self-Employed
Josie Smith-Wright	Secretary/District 4	2021	17	Manager
Sue Gottwald	District 6	2020	12	Retired Principal
Justin Schwausch	District 2	2022	10	Global Mapping Technician
Ross Hendershot III	District 5	2020	12	Banker
Sandra Gorden	District 7	2021	2	Retired Teacher

Note: (1) The length of service is recorded as of March 2020.

Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

FIGURE 1–2
GONZALES ISD ORGANIZATION
SCHOOL YEAR 2019–20



Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

The Legislative Budget Board's School Performance Review Team visited the district in March 2020.

DETAILED ACCOMPLISHMENTS

BOARD ENGAGEMENT

Each board member adopts a campus to promote board accessibility, visibility, and connection to the campus community.

Board members stated that a new process began during school year 2019–20 wherein the superintendent assigns board members to a campus with the goal of having a consistent board presence and visibility at campuses. Board members are encouraged to attend events at their assigned

campuses and to visit the campuses and interact with the staff. Board members reported that their presence and interactions have been well received and provide a connection to the issues and challenges at the campus level.

STAFF ACCESSIBILITY

Administrative staff regularly visit campuses to provide central office support and transparency.

In the review team's interviews of administrative staff, they stated having an intentional effort to improve their accessibility to the campuses. Staff visit campuses at least weekly to understand the challenges at the campuses and to determine how to develop efficiencies across the district. A

result of the process is that district administration is more visible on campuses and more accessible to the campus staff.

ORGANIZATIONAL CULTURE

The superintendent's initiatives have improved and enhanced the Gonzales ISD culture.

In the review team's interviews with staff, board members, administrative staff, and principals stated that the district is undergoing a significant culture change under the leadership of the new superintendent. The superintendent has decentralized district operations and empowered the administrative staff and principals to operate more collaboratively and meet regularly as a leadership team. As a result, administrative staff and principals lead initiatives on their campuses, and board members said they feel more informed about the district's operations.

DETAILED FINDINGS

LONG-TERM PLANNING (REC. 1)

Gonzales ISD has not developed a planning process to guide the district.

Gonzales ISD develops several plans annually, including the following plans:

- district improvement plan (DIP);
- · campus improvement plans (CIP); and
- campus targeted improvement plans (TIP).

The Texas Education Code, Section 11.252, requires school districts to develop a DIP. The DIP is a district-level, one-year plan. Its purpose is to guide district and campus staff in the improvement of student performance for all student groups to meet the state student achievement standards. The superintendent, with the assistance of the district-level planning and site-based decision-making committee, develops the DIP.

In addition to the DIP, the Texas Education Code, Section 11.253, requires all campuses to develop CIPs. The CIP is a campus-level one-year plan that sets the campus educational objectives and guides how the campus will allocate resources and time to meet the determined objectives. For school year 2018–19, the Texas Education Agency changed its campus rating system to a letter grade rating system. Campuses that receive C or D ratings are required to complete campus-level TIPs to address all areas of insufficient performance. For

school year 2018–19, three Gonzales ISD campuses received D ratings.

Gonzales ISD's planning document that most resembles a districtwide strategic plan is the DIP.

Although the DIP provides critical direction, the district develops the plan annually and the document is not a substitute for a strategic plan. Furthermore, statute does not require the DIP to provide long-range planning or to address systemic needs unrelated to student performance, such as facility needs.

The absence of a detailed and long-term strategic plan can result in a lack of board accountability and oversight. This lack of oversight can affect student outcomes and the ability to improve student achievement and district performance. Without a comprehensive strategic plan, the district may react to administrative, operational, and academic challenges annually rather than plan systematically through a well-defined process. In addition, without an established and comprehensive strategic planning process, a district cannot articulate its direction based on consensus of long-term needs, use of resources, or stakeholder goals.

Stakeholder involvement is essential to developing a long-term strategic plan that meets the educational needs of the community the school district serves. Without a strategic planning process that involves internal and external stakeholders, the district cannot develop a shared vision for the future and structure its instructional programs, operations, technology, safety and security, and facility programming to meet the needs of its students and community.

Strategic plans enable school districts to overcome unforeseen events more quickly, allocate budget and human resources to achieve goals more efficiently, and establish accountability standards more effectively. For example, a drop in tax base due to economic decline could affect the district's budget without proper planning.

Sound strategic plans encompass all aspects of district operations including academic, operational, and financial goals. Each goal is connected to resource requirements, student achievement, implementation steps, timelines, action items, performance measures, and fund requirements. A strategic planning process can also be a means for obtaining stakeholder support by bringing staff, parents, and community members into the planning process.

American Productivity & Quality Center, a nonprofit organization focused on helping organizations adapt to changing environments through benchmarking and metrics, best practices, knowledge management, performance improvement, and professional development, notes that strategic plans enable districts to perform the following actions:

- provide a focus through formalizing of the school district's mission, vision, values, goals, and objectives;
- · engage the community and stakeholders; and
- promote efficiency and save money.

Effective districts develop a three-year to five-year plan that identifies the districts' strategies, person responsible, timeline, and required funding. Districts should review the plans regularly to monitor and communicate progress to stakeholders.

Districts use different strategies to establish a comprehensive strategic planning process effectively. For example, Tatum ISD uses a strategic planning and monitoring process called a continuous improvement cycle that involves iterative and ongoing review and alignment of the district's strategic plan, program plans, and CIPs. All of these plans are developed and reviewed with significant input from all stakeholders, including staff, teachers, parents, and community representatives. A focus group of principals in Tatum ISD reported that this cycle is one of the main educational issues discussed in instructional administrative team meetings. Principals in that district must connect their CIPs to the DIP so that the focus of the entire organization is consistent. Each January, the superintendent presents a monitoring report to the board showing highlights, issues, and plans for each objective of the strategic plan that has been adopted as the official DIP for that year. Principals also prepare and present CIP reports to the board. Tatum ISD develops similar reports for each goal and objective for the DIP and the district's technology plan.

Gonzales ISD should develop and implement a three-year to five-year comprehensive strategic plan with measurable goals to align all areas of district operations and serve as a framework for district decision making.

The superintendent and the board should ensure the strategic planning process addresses functional areas that are not required in a DIP, such as facilities, technology, risk management, and safety and security. Any strategic planning efforts by the district should include input from staff as well as community members and other stakeholders.

To implement this recommendation, Gonzales ISD should complete the following tasks:

- form a district team including the superintendent, leadership staff, board representative, and cabinet staff to develop a timeline for the strategic planning process, identify participants, and facilitate the logistics of the process;
- form a district steering committee including district administration, teachers, principals, board, business community representative, parents, and students to represent all stakeholder groups and to identify the overall direction, values, mission, vision, purpose, and goals for the plan;
- establish an action planning committee including one representative from each stakeholder group superintendent, senior staff, teachers, principals, board, business community representatives, parents, and students—to write objectives, develop strategies, identify resources, and design metrics to measure the outcomes;
- ensure that the plan is written, shared with the public, and posted on the district website for public comment;
- incorporate components of the plan in the annual district and campus improvement plans; and
- develop key highlights of the strategic plan to share with the business community and other organizations.

In developing this plan, the district team should supplement the goals with specific measurable long-term objectives for both instructional and noninstructional areas. The action plan should identify the resources required to accomplish the goals including funding sources. The district also should identify staff assigned to achieve the goals within an established timeline. The typical period for achieving goals established in a long-term strategic plan ranges from three years to five years. The assigned staff should report periodically to the board on the progress of accomplishing each action plan.

Gonzales ISD also should consider holding an annual strategic planning retreat with board members, the superintendent, and any identified key stakeholders to discuss the progress of the strategic plan.

Since the time of the review, the district contracted with Regional Education Service Center XIII for a districtwide strategic planning process. The district had already contracted with the Texas Association of School Boards (TASB) for a facilities assessment and long-range facilities plan and had completed a review of the Technology Department through a partnership with the Texas Association of School Business Officials for implementation of a comprehensive technology improvement plan.

The district could implement this recommendation with existing resources.

BOARD POLICIES (REC. 2)

Gonzales ISD does not manage its board policies and operating procedures actively.

A key school board responsibility is to review and adopt policies that guide how the district operates. Each of the following policy types serves a unique purpose:

- legal policies represent existing laws and are updated as laws change;
- local policies are directives from the board to the school district that represent local board positions and often are unique to the district. Local policy typically expands on or qualifies directives or options provided by law. Each district adopts, updates, and readopts local policies as needed; and
- regulations are intended to implement board policies that school administrators develop. Regulations provide detailed guidelines, descriptions, practices, and procedures for district operation; and exhibits, also known as forms, are supporting documents for policies and regulations.

Board policy and the accompanying regulations and exhibits assist the district to complete the following tasks:

- provide direction and save time;
- · comply with and implement laws and regulations;
- establish and define rights;
- · establish stability and continuity;
- · define responsibilities and ensure accountability;
- inform the community, parents, staff, and students;
- · protect the district in case of a legal challenge; and
- · comply with state accreditation standards.

Gonzales ISD maintains a board policy manual containing seven major sections: Basic District Foundations, Local Governance, Business and Support Services, Personnel, Instruction, Students, and Community and Governmental Relations. During onsite interviews, district staff and board members reported that Gonzales ISD does not review and update board policy on a regular schedule, but rather on an ad hoc basis. The district has no process to ensure that the board develops new policies regularly and writes local policies to address the legal policies. When the board becomes aware of a policy that needs to be updated, the board notifies the superintendent's secretary of changes, and the secretary makes the necessary updates.

An example of an outdated Gonzales ISD Board Policy is Board Policy AE (LOCAL). This policy is dated November 2006 and includes the following mission statement:

The mission of the District, a community unified by the spirit of independence and excellence, is to guarantee that each student fully realizes his or her individual potential through an education system characterized by:

- high expectations for all students;
- a highly qualified and caring team of educators and staff;
- a strong community of citizens, schools, and students;
- an atmosphere conducive to learning;
- challenging curricula designed to meet the unique needs of each student;
- · optimal use of technology, seamlessly integrated; and
- safe, healthy, and modern facilities that enhance learning.

However, the current mission statement of the district, not adopted into the board policy but as included in the DIPs for school years 2016–17 to 2019–20 is the following statement

Gonzales ISD is committed to a spirit of excellence in caring service and partnerships that equip students for continuous learning supporting resilience in achieving personal aspirations, compassionate and dynamic citizenship in an ever-changing world.

Gonzales ISD's board also does not have updated operating procedures. These procedures are instructions to help board members implement their responsibilities.

Board operating procedures typically outline practices for the following activities:

- · developing board meeting agendas;
- · conducting board meetings;
- · electing board officers;
- · setting annual goals;
- · establishing training requirements;
- · communicating with the community and the media;
- · evaluating the superintendent; and
- · developing district hiring practices.

Operating procedures assemble all this information into one source that board members can reference when, for example, they are uncertain about board procedures on a particular topic or how best to carry out their responsibilities. Gonzales ISD's Board Operating Procedures last were revised or agreed to in January 2007. The board's lack of a review process for its policies and operating procedures places the district at risk of maintaining outdated local policies and regulations that do not comply with state and federal regulations or could increase inefficiency in district operations. Additionally, outdated Board Operating Procedures may contribute to board members not understanding their roles and responsibilities and the board's processes.

Policy making is an essential process for school board members to make sound decisions regarding complex issues. Effective districts develop policy to improve student outcomes and learning. TASB recommends that school boards participate in a thorough policy review and audit every five years to seven years, following a change in superintendent, or following significant turnover in board membership. TASB offers districts a policy review session (PRS) through which a consultant works with the board and the superintendent to evaluate and revise district policies. This process provides policy recommendations for the board to consider and approve, which results in a newly updated policy manual.

Gonzales ISD should establish a timeline and framework to review and update board policies and operating procedures systematically.

The district should schedule a PRS with TASB, which will require the superintendent and board to complete the following actions:

- · examine and update district policies;
- · receive training on best policy-making practices; and
- · gain a deeper understanding of the district.

The board also should review its Board Operating Procedures annually to serve as a refresher of current procedures and an assessment of whether those procedures align with the district's current needs. TASB recommends that boards review operating procedures annually.

As a part of the PRS process, TASB will develop a revised policy manual. To maintain this level of review, the district should budget for a PRS every five years.

Following the PRS session, the district should work with a TASB Policy Service consultant to develop an internal review system to maintain and revise policy as needed. After the district establishes a method of review, the superintendent and board should assign staff the task of maintaining the review schedule. Policies can be grouped by topic or category and delegated to staff or board members who have an understanding of the policy area. Some policies may warrant feedback and consultation with a stakeholder group.

The fiscal impact assumes the district schedules a PRS with TASB, resulting in a onetime cost of \$24,000. This amount includes the cost for the PRS session; travel, lodging, and meals for the TASB facilitators while they are visiting the district; and a revised policy manual that will result from the PRS.

Since the review team's onsite visit, the district has entered into an agreement with TASB to conduct a PRS. The dates for the PRS are still pending.

SUPERINTENDENT EVALUATION (REC. 3)

Gonzales ISD's Board of Trustees lacks a structure to hold the superintendent accountable for advancing student achievement and ensuring the district's efficient operation.

The Texas Education Code, Section 11.1511, specifies the powers and duties of the board. Among other responsibilities, the board must "ensure that the superintendent ... is accountable for achieving performance results." The Texas Administrative Code, Title 19, Part 2, Chapter 150, Subchapter CC, Section 150.1031, also requires that the board establishes specific objectives for a superintendent's performance or use the appraisal system recommended by the Commissioner of Education.

Gonzales ISD's board has not, however, developed specified measurable performance goals by which to evaluate the superintendent's performance. Neither the superintendent's contract nor the evaluation instrument used by the board contain such goals. The goals identified in the superintendent evaluations are broad and there is no indication of how the board would determine if the goals are met. For example, one of the Board Priority Performance Goals listed in the superintendent's 2019 evaluation was to "provide for improvement of low-performing schools." The related superintendent priority performance goal noted that "by January 2019, the superintendent will provide evidence of improvement of low-performing schools." However, the evaluation provides no specific criteria that the board would need to evaluate accomplishment of this goal.

In a review of the three most recent superintendent evaluations, the board provides ratings of key areas of performance using the following rating scale:

- E Exceptional progress exceeds expectations and criteria notes in the instrument;
- P Proficient progress meets expectations and criteria notes in the instrument; and
- N Needs Improvement progress does not meet expectations and criteria notes in the instrument.

Each evaluation also provides an area for comments to support the rating given by the board for each of the Board Priority performance goals. None of the three evaluations reviewed contained written comments explaining the rationale for the identified rating. The evaluations provided insufficient information to determine what the board reviewed to support the assigned rating, and the board provided no actionable written feedback to address the superintendent's areas of strength or opportunities for improvement.

The current superintendent has been with the district since June 2019. Although superintendent evaluations typically are reviewed in January, the board and superintendent have postponed the new superintendent's first evaluation until June 2020.

Without clear objectives, neither the board nor the superintendent is able to determine whether adequate results are being achieved.

In its July 2014 report A Case for Improving Superintendent Evaluation, the National Association of School Boards

describes how superintendents and boards play key roles in the performance and outcomes of school systems. Fair, valid, and objective-driven evaluation of a superintendent's performance is critical to the work of the superintendent and the district. Without an effective performance-based evaluation process for the superintendent, it is difficult to align and focus the board and superintendent leadership for significant improvement of the district.

TASB provides direction to boards in developing effective superintendent evaluation processes with measurable performance goals. TASB provides a framework for connecting the superintendent's performance goals with those of the board. TASB also states that goals should contain criteria for what will demonstrate successful performance. The sample procedures document provided by TASB references the use of performance goals at several points in the evaluation process. TASB suggests that the board identify the performance goal areas at the conclusion of the evaluation, and develop specific performance goals within a month after the summative evaluation. At a posted meeting within six weeks after the summative evaluation, TASB recommends that the board and superintendent meet to discuss the goals and set the target results for the next summative evaluation. With this approach, reviewing and setting performance goals is an integral part of the superintendent's evaluation.

Gonzales ISD should develop annual, measurable objectives and an aligned evaluation instrument to manage the superintendent's performance.

To implement this recommendation, the board and superintendent should establish a new set of goals tied to clearly defined measures of progress. For example, the annual student performance goals should be determined based on the results of the annual performance report.

The board should use superintendent appraisal worksheets or adopt an alternate method for considering student performance data. The board and superintendent should align the measures to one of the performance categories or establish a district goal to match the student performance measures. The board and superintendent should complete the same process for each goal area for which the board evaluates the superintendent to ensure that the district uses measurable performance indicators for the superintendent evaluation.

After the board and superintendent have identified goals, they should develop criteria for determining successful performance. This step also should include a data collection method that ensures validity and reliability. The board and superintendent should collaborate to develop detailed procedures for the evaluation system. Finally, the board should review the appraisal form developed and the procedures to ensure alignment to both state and district requirements.

The superintendent should present to the board data documenting the status of the district's performance with respect to indicators specified in the template. The board and superintendent should review this baseline data jointly and establish midyear and end-of-year objectives. The end-of-year objectives should be incorporated into the TASB template for summative evaluation purposes, and the midyear objectives should be included for informal midyear review. The superintendent should then finalize the evaluation tool for adoption by the board.

After the superintendent evaluation system is defined clearly with measurable goals and detailed procedures, the board should submit the evaluation system to the district's attorney for review.

The district could implement this recommendation with existing resources.

NEW BOARD MEMBER TRAINING (REC. 4)

Gonzales ISD does not train and orient new board members consistently.

The superintendent's secretary records board training to ensure that board members are meeting their training requirements. The secretary ensures that new board members attend new board member trainings at TASB's annual Summer Leadership Institute, which takes place in June each year. However, no district-specific process provides a new board member with training on how the district operates, including an understanding of district finances, strategic goals, and board members' responsibilities. The district has no formalized process regarding the type of information that should be shared with new members. With the exception of one new board member elected during school year 2018–19, all of the other board members have served for 10 or more years.

Without a formal orientation process, new board members may lack clear direction on how they can be effective on the board. It may take months for a board member to understand the process or to feel comfortable contributing in a board meeting. School board members are required to receive a local orientation within 120 days of the election or appointment of a new trustee. TASB suggests that the entire leadership team can have input into this orientation. To focus on what new members need to know within the first three months to six months so that they can understand and contribute to team actions, local orientations should consider the following guidelines:

- the local orientation does not need to be held all in one session; consider multiple, shorter sessions that focus on specific topic areas;
- an informal, one-on-one setting that enables two-way conversations often is more helpful than a lecture;
- information that is not immediately necessary can be left out, but be sure to let new board members know where to find it; and
- provide an indexed notebook of all the information covered in the orientation so that the new member can find it later.

Gonzales ISD should develop a formal orientation and training process for new board members.

This process will enable new members to be more effective and quickly integrate into the Gonzales ISD's board organization.

The board should develop and implement a local onboarding process that includes all of the information necessary to train new members. At a minimum, this process should include a review of district financial statements, how to understand the budgeting process, a review of board policies and procedures, and an orientation meeting with the superintendent. Gonzales ISD should update Board Policy BBD (LOCAL), which specifies training and orientation requirements for board members, to include the new onboarding process.

While the district does not have a formal orientation process, it has been district leadership's practice to provide new board members with pertinent information upon assuming office. Additionally, the new superintendent has experience with frequent board member turnover and formal orientation and training processes that will assist the district in implementing this recommendation.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations:

DISTRICT COMMUNICATION

Gonzales ISD's use of the Smoke Signal, a districtwide communication tool, is inconsistent. The Smoke Signal is a calendar that the district uses to communicate important events and due dates to district staff. The tool provides a district-level calendar and campus-level calendars. Several staff stated that the Smoke Signal is helpful and informative, and that it has increased communication from central office staff to campus staff. However, during interviews, not all staff reported knowing that the district was using the Smoke Signal as a form of communication. Other staff stated that information in the Smoke Signal is not kept up-to-date. They noted that due dates and events from the previous school year are still visible in the tool's interface, making it difficult to identify current information. Staff also stated that not all district staff are using the calendar, and some due dates have not been met.

BOARD PRESIDENT AND OFFICER TERM LIMITS

Gonzales ISD's board composition is relatively static. In most board elections, board member's seats go unchallenged. With the exception of one board member who has been with the district for less than two years, all other board members have been with the district for 10 or more years. Three board members have served for more than 17 years. Additionally, the board president, vice president, and secretary have held their positions for the past 12 years. Every year, after elections, the board elects its officers. For the last few years, board members moved to maintain all officers.

The Texas Education Code does not impose term limits on the boards of independent school districts. However, having a board that includes mainly members that have served a significant number of years or served in the same officer positions increases the risk that a board operates in an accustomed manner, repeating the same processes and decisions without introspection or innovation of thought.

Establishing term limits would enable the board to adjust its leadership to suit the changing needs of the district and help to prevent an ineffective president from remaining in that role.

BOARD SELF EVALUATION

The Board Operating Procedures state that the board routinely should assess the status of the team. However, board members reported that the board does not conduct annual self evaluation regularly.

Considering the longevity of service of the Gonzales ISD's board members, it is important for the board to evaluate its own performance regularly to ensure that it remains proactive in achieving the district's mission and goals. TASB provides member districts with effective board practices, including a self-assessment tool and a document that assists boards in methods for discussing the results of the assessment or inventory.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team identified a fiscal impact for **Recommendation 2** (board policies).

	COMMENDATION DISTRICT ORGANIZATION, PLANNING, ANI	2020–21 D GOVERNA	2021-22 NCE	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
2.	Establish a timeline and framework to review and update board policies and operating procedures systematically.	\$0	\$0	\$0	\$0	\$0	\$0	(\$24,000)
То	tal	\$0	\$0	\$0	\$0	\$0	\$0	(\$24,000)

2. EDUCATIONAL SERVICE DELIVERY

Gonzales Independent School District (ISD) had 2,859 students and 182.1 teacher positions during school year 2018–19. The district received an overall accountability rating of B for school year 2018–19 from the Texas Education Agency. For school year 2019–20, Gonzales ISD budgeted \$15,544,705 for curriculum and instruction.

The district has six campuses, each serving different grade levels. **Figure 2–1** shows enrollment at each Gonzales ISD campus and the grade levels each serves.

ACCOMPLISHMENT

 Gonzales ISD provides comprehensive training for its substitute teachers.

FINDINGS

- ◆ Gonzales ISD's Curriculum and Instruction Department is not organized efficiently, which causes discontinuity in instructional support.
- ♦ Gonzales ISD does not have a formal adoption process for instructional resources and materials.
- ♦ Gonzales ISD does not implement its behavior management model effectively, which leads to ineffective and inconsistent disciplinary practices districtwide.
- ◆ Gonzales ISD does not support English as a second language and bilingual instruction equitably, which limits English learners' academic growth.
- ♦ Gonzales ISD does not provide adequate instructional support to students served by special education.
- ◆ Gonzales ISD's school counselors have multiple duties, which limit their abilities to support students effectively.
- ♦ Gonzales ISD does not implement its instructional model effectively, which impedes student achievement.
- Gonzales ISD does not have an effective process for providing professional development to district staff.

FIGURE 2–1
GONZALES ISD CAMPUSES AND ENROLLMENT
SCHOOL YEAR 2018–19

CAMPUS	GRADE LEVELS	ENROLLMENT
Gonzales Primary Academy (1)	Prekindergarten to kindergarten	352
Gonzales East Avenue Primary School	Grades 1 to 2	389
Gonzales Elementary School	Grades 3 to 4	400
Gonzales North Avenue Intermediate School	Grades 5 to 6	429
Gonzales Junior High School	Grades 7 to 8	468
Gonzales High School	Grades 9 to 12	821

Note: (1) Gonzales Primary Academy also offers Early Childhood Education at its campus.

Source: Texas Education Agency, School Report Card, school year 2018–19.

RECOMMENDATIONS

- ♦ Recommendation 5: Evaluate the roles and responsibilities of staff in the Curriculum and Instruction Department to support academic instruction more effectively.
- Recommendation 6: Develop an adoption process for instructional resources and materials that includes staff and parent input, adoption timelines, and adequate training.
- ♦ Recommendation 7: Provide staff with continuous training on the district's behavior management model and monitor for implementation.
- ♦ Recommendation 8: Research dual-language oneway models and evaluate additional district needs to ensure that the model selected is implemented with fidelity.
- ♦ Recommendation 9: Evaluate the effectiveness of the district's special education program, including staffing and instructional delivery.
- ♦ Recommendation 10: Evaluate whether the current roles and responsibilities of school counselors limit their abilities to support students.

- ♦ Recommendation 11: Provide ongoing training to principals and teachers on the district's response to intervention model.
- Recommendation 12: Guide professional development for instructional staff based on the district's academic goals and student achievement data.

BACKGROUND

An independent school district's educational service delivery function provides academic services to Texas students based on state standards and assessments. A school district should identify and support students' educational needs, provide instruction, and measure academic performance. Educational service delivery must meet the needs of a variety of student groups and requires adherence to state and federal regulations related to standards, assessments, and program requirements.

Management of educational services is dependent on a district's organizational structure. Larger districts typically have multiple staff dedicated to educational functions. Educational service delivery identifies district and campus priorities, establishes high expectations for students, and addresses student behavior. The system should provide instructional support services such as teacher training, technology support, and curriculum resources. To adhere to state and federal requirements, districts must have systems to evaluate student achievement across all content areas, grade levels, and demographic groups.

Figure 2–2 shows Gonzales ISD's student demographics for school year 2018–19 compared to state averages.

FIGURE 2–2 GONZALES ISD STUDENT DEMOGRAPHICS SCHOOL YEAR 2018–19

STUDENT	DISTRICT	STATE
Hispanic	66.7%	52.6%
White	24.9%	27.4%
African American	7.8%	12.6%
Asian	0.2%	4.5%
Two or more races	0.2%	2.4%
American Indian	0.1%	0.4%
Pacific Islander	0.1%	0.2%
Economically disadvantaged	73.6%	60.6%
At risk of dropping out	64.6%	50.1%
English learners	18.7%	19.5%
O	A	

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2018–19.

Approximately 73.6 percent of students were categorized as economically disadvantaged, which is greater than the state average of 60.6 percent. The district's percentage of students designated as at risk of dropping out, 64.6 percent, also was greater than the state average of 50.1 percent.

Figure 2–3 shows Gonzales ISD's accountability ratings from school years 2016–17 to 2018–19. For school year 2018–19, three campuses earned D ratings.

The assistant superintendent oversees Gonzales ISD's Curriculum and Instruction Department, which supports campuses and academic staff. Figure 2–4 shows the

FIGURE 2–3
GONZALES ISD ACCOUNTABILITY RATINGS
SCHOOL YEARS 2016–17 TO 2018–19

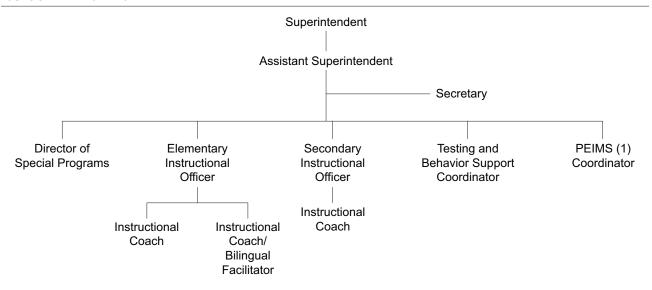
DISTRICT OR CAMPUS	2016–17	2017–18 (1)	2018-19 (2)
District	Met Standard	F	В
Gonzales High School	Met Standard	Improvement Required	С
Gonzales Junior High School	Met Standard	Met Standard	С
Gonzales North Avenue Intermediate School	Met Standard	Met Standard	С
Gonzales Elementary School	Met Standard	Improvement Required	D
Gonzales East Avenue Primary School (3)	Met Standard	Improvement Required	D
Gonzales Primary Academy (3)	Met Standard	Improvement Required	D

Notes:

- (1) At the direction of the Texas Legislature, the Texas Education Agency (TEA) changed the district accountability score to a letter grade during school year 2017–18.
- (2) TEA implemented accountability scores of letter grades for campuses during school year 2018–19.
- (3) Gonzales East Avenue Primary School and Gonzales Primary Academy are paired with Gonzales Elementary School and receive the same accountability score.

SOURCE: Texas Education Agency, Texas Academic Performance Report and School Report Card, school years 2016-17 to 2018-19.

FIGURE 2–4
GONZALES ISD CURRICULUM AND INSTRUCTION DEPARTMENT
SCHOOL YEAR 2019–20



Note: (1) PEIMS=Public Education Information Management System.

Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

organization for the Gonzales ISD's Curriculum and Instruction Department.

The Curriculum and Instruction Department includes the elementary and secondary instructional officers and instructional coaches. The assistant superintendent also oversees the director of special programs, the testing and behavior support coordinator, and the Public Education Information Management System (PEIMS) coordinator.

Gonzales ISD operates a disciplinary alternative education program (DAEP) through an interlocal cooperation agreement with Nixon-Smiley Consolidated ISD, which manages the DAEP and provides instruction to Gonzales ISD students using Gonzales ISD's curriculum.

Since the onsite visit, Gonzales ISD has reconfigured two of its campuses to serve different grade levels. Beginning in school year 2020–21, Gonzales Elementary School will serve grades 3 to 5, and Gonzales North Avenue Intermediate School will serve grade 6. Additionally, district staff said that the Curriculum and Instruction Department was reorganized before school year 2020–21. The instructional officer positions are now curriculum directors that report to the assistant superintendent, and the district increased the number of instructional coaches from three to six.

DETAILED ACCOMPLISHMENT

SUBSTITUTE TRAINING

Gonzales ISD provides comprehensive training for its substitute teachers.

New substitute teachers participate in an orientation at the beginning of the school year. The training covers the following topics:

- general campus information, including campus phone numbers and campus leadership information;
- the district's standards of conduct, including grounds for removal from position and how to report sexual harassment;
- · substitute teaching staff's roles and responsibilities;
- · general classroom management guidance;
- safety and security procedures, including information on various emergency drills, a first-aid overview, and reporting child abuse or neglect;
- pay scale for substitute teachers; and
- how to use the district's absence management system.

Additionally, the district provides substitute teachers with a Substitute Training Guide and the school year 2019–20

Substitute Handbook. The training guide describes how to be successful as a substitute teacher and provides instructional techniques, classroom management strategies, an overview of special education students and special populations, and a summary of the legal aspects of substitute teaching. Staff sign an acknowledgement that they have received a physical or electronic copy of the school year 2019–20 handbook. It provides general district information, including important district phone numbers, a list of district and campus leadership, the school year 2019–20 pay schedule, relevant Gonzales ISD Board of Trustees (board) policies, and expectations, procedures, and responsibilities of substitute staff.

DETAILED FINDINGS

CURRICULUM AND INSTRUCTION DEPARTMENT ORGANIZATION (REC. 5)

Gonzales ISD's Curriculum and Instruction Department is not organized efficiently, which causes discontinuity in instructional support.

The Legislative Budget Board's School Performance Review Team visited the district in March 2020. During school year 2019–20, the district reorganized the Curriculum and Instruction Department, adding new positions and assigning additional responsibilities to existing positions. Staff said that some organizational changes occurred after the school year had started, and several staff were learning their new responsibilities at the time of the review team's onsite visit.

The Curriculum and Instruction Department developed the positions of elementary instructional officer and secondary instructional officer. The district's organization, shown in Figure 2–4, shows that the instructional coaches report to the instructional officers. However, according to some staff, the assistant superintendent has not outlined clearly the direct reporting structure for the instructional coaches. Additionally, because the instructional officer positions are new, staff said that the responsibilities for the position are not well defined, and that instructional officers continue performing instructional coaches.

The instructional officers oversee the common assessments for the district, including the midyear practice State of Texas Assessments of Academic Readiness (STAAR) and the sixweek assessments. These officers develop the assessment guidelines, coordinate with the company that generates the assessments, and review the drafts. Instructional officers also

schedule universal screener assessments to evaluate students' academic levels in math and reading, meet weekly to support and provide training to instructional coaches, and, as of October 2019, oversee instructional materials for the district. According to staff, instructional officers do not oversee instructional coaches at the campuses. Staff reported that 75.0 percent of the instructional officers' time is focused on assessments and administrative duties, and 25.0 percent on coordinating with instructional staff and principals. Each instructional officer has additional duties.

The elementary instructional officer oversees the district's literacy initiative, pursuant to House Bill 3, Eighty-sixth Legislature, 2019. The secondary instructional officer oversees instructional technology for the district and its gifted and talented program. However, the secondary instructional officer said that instructional technology responsibilities are limited to generating user names and passwords for the district's instructional programs and for the Texas Essential Knowledge and Skills Resource System, and managing the district's databases to monitor student progress. Curriculum and instruction staff said that the secondary instructional officer also is the instructional coach for the high school. However, the high school developed the academic dean position during school year 2019–20 to support high school teachers and serve in the instructional coach role. The secondary instructional officer assists the high school academic dean, who reports to the high school principal.

The district has three instructional coaches that serve five campuses. The instructional coaches provide coaching and training to teachers to help improve classroom instructional delivery and coordinate with principals on data-driven instruction. They also perform classroom walkthroughs, provide teachers with feedback, research additional instructional resources for teachers, and facilitate professional learning committee meetings. One instructional coach is assigned to the two primary campuses, from prekindergarten to grade 2, and also serves as the district's bilingual facilitator. The other two instructional coaches divide their efforts among the elementary and intermediate campuses and the junior high school, grades 3 to 8. However, staff said that instructional coaches are expected to coach teachers in subjects outside their areas of expertise. For example, at the junior high school, an instructional coach with a mathematics background was assigned to help in social studies and English, language arts, and reading. Multiple district and campus staff reported a need for additional instructional coaches to support the various campuses.

The district developed the bilingual facilitator position during school year 2019-20 and added those responsibilities to an existing instructional coach position. The bilingual facilitator trains staff on the language proficiency assessment committee, communicates information on the Texas English Language Proficiency Assessment System (TELPAS) to staff, and collaborates with noncertified staff who deliver English as a second language instruction through a waiver from the Texas Education Agency (TEA). According to staff, the instructional coach/bilingual facilitator reports to different staff for each position, reporting to the elementary instructional officer as an instructional coach and to the assistant superintendent as the bilingual facilitator. The instructional coach/bilingual facilitator receives a stipend for being the bilingual facilitator and performs bilingual facilitator duties approximately 50.0 percent of the time. However, many campus staff reported that the instructional coach/bilingual facilitator is rarely at the primary campuses, and one said that these campuses do not have an instructional coach because the assigned staff is the district bilingual facilitator. Additionally, because the bilingual facilitator duties are new, staff said that the instructional coach/bilingual facilitator is often away from the district attending training.

In October 2019, the district added testing duties to the behavior specialist position, which it retitled testing and behavior support coordinator. Additionally, the district charged this position with overseeing foster, homeless, migrant, and immigrant students, and collaborating with the PEIMS coordinator to ensure that students' data are coded correctly. The testing and behavior support coordinator reports to the assistant superintendent. The testing and behavior support coordinator reported that the time devoted to each role is 60.0 percent for testing, 30.0 percent for providing behavioral support, and 10.0 percent for monitoring foster, homeless, migrant, and immigrant students. Behavioral responsibilities include collaborating with special education students and staff in life-skills classes, managing students' behavioral supports, developing behavior plans, performing functional behavior assessments, and classroom management. The testing and behavior support coordinator also attends admission, review, and dismissal committee meetings for students served by special education, as needed, and provides behavioral input for these students' individualized education programs. According to staff, the number of students identified as special education has increased from school years 2017-18 to 2019-20. Additionally, several staff said the coordinator's duties have increased to include performing general education classroom

observations and providing classroom management strategies for teaching staff. However, the testing and behavior support coordinator does not perform classroom observations regularly due to testing duties. The district does not support behavior management consistently at the campuses, and has seen an increase in the number of students disciplined for violations of the district's code of conduct.

Testing duties include overseeing the administration of the STAAR, STAAR Alternate 2, TELPAS, and TELPAS Alternate to students who qualify for each assessment. The testing and behavior support coordinator collaborates with campus testing coordinators and campus counselors to ensure that students receive the correct exam and have access to any necessary accommodations for students who qualify. Each campus is required to have a campus testing coordinator, and the assistant principals served in this role during school year 2019-20. However, counselors are responsible for coordinating the administration of STAAR Alternate 2, TELPAS, and TELPAS Alternate at each campus. The testing and behavior support coordinator trains the campus testing coordinators and counselors. The high school has its own testing coordinator, who collaborates with the testing and behavior support coordinator. Several staff reported that the duties of a testing coordinator equate to a full-time position.

The testing and behavior support coordinator alerts multiple campus staff, including counselors, about students identified as foster, homeless, migrant, and immigrant students, to ensure that they receive the support they need. Staff reported that the testing and behavior support coordinator does not follow up with the students or the counselors.

The district did not provide defined roles and expectations to staff when the Curriculum and Instruction Department reorganized; as a result, many staff received additional duties that affect their abilities to support teachers and students at the campus level. Additionally, when the district developed new positions, it decreased the number of instructional staff available to support teachers.

As a best practice, effective school districts evaluate additional roles and responsibilities assigned to staff to ensure primary and secondary job responsibilities are performed effectively. Districts work to communicate clearly to all staff any changes to positions, job duties, and reporting structures.

Gonzales ISD should evaluate the roles and responsibilities of staff in the Curriculum and Instruction Department to support academic instruction more effectively.

The assistant superintendent should coordinate with Curriculum and Instruction Department staff to determine the role, responsibilities, and goals of each job position, and delineate a clear reporting structure. The assistant superintendent should:

- collaborate with the elementary and secondary instructional officers to develop a job description and expectations for the roles, including any supervisory responsibilities; and
- coordinate with the instructional coach/bilingual facilitator and the testing and behavior support coordinator to evaluate the success of the dual roles and determine if these duties should be reallocated among separate positions based on the stated goals and responsibilities for each position.

Additionally, the assistant superintendent should collaborate with the instructional officers to determine if campuses are supported effectively with the available instructional coaches. Changes to the Curriculum and Instruction Department organization and reporting structure should be clear to all district staff.

A fiscal impact is not assumed until the district evaluates job position responsibilities to determine if it will change the Curriculum and Instruction Department organization.

INSTRUCTIONAL RESOURCES AND MATERIALS ADOPTION PROCESS (REC. 6)

Gonzales ISD does not have a formal adoption process for instructional resources and materials.

Gonzales ISD uses the Texas Essential Knowledge and Skills (TEKS) Resource System as its curriculum and uses instructional resources and materials that follow the curriculum to instruct students. The district's last instructional resource adoption occurred before school year 2018–19. The district adopted an English language arts and reading (literacy) instructional resource for prekindergarten to grade 6.

Many staff reported that the English literacy instructional resource adoption was a curriculum and instruction staff decision that had minimal to no input from teaching staff or campus leadership. Staff said that principals evaluated the literacy instructional resource chosen by the district but did not have the opportunity to compare and provide input on other instructional resources from different vendors. Teachers were not asked to provide input. Staff said that teachers could

have raised concerns over the rigor of certain parts of the instructional resource if the district had included them in the adoption process. Additionally, curriculum and instruction staff reportedly were not receptive to the concerns of staff who asked about the lack of a Spanish literacy instructional resource for English as a second language and bilingual instruction. During interviews, some staff said that vendors do not offer Spanish literacy instructional resources, but other staff reported that vendors do offer Spanish literacy instructional resources.

TEA provides districts with a list of instructional materials adopted by the Texas State Board of Education (SBOE) that follow the TEKS standards. In accordance with Gonzales ISD Board Policy CMD (LEGAL), the district is not required to select instructional materials from the list and can purchase a different one that also follows the TEKS standards. Gonzales ISD's English literacy instructional resource, Fountas & Pinnell The Classroom, is not one of the 2019 adopted materials. The list of adopted instructional materials also shows the availability of Spanish literacy instructional resources approved by the SBOE that the district could have purchased.

The assistant superintendent reported that the literacy instructional resource vendor researched bilingual literacy instructional resource components and provided them to the district. However, the bilingual components are not a comprehensive instructional resource and do not resemble the English literacy instructional resource. Staff said the bilingual literacy components do not meet all the TEKS standards for Spanish literacy. Instructional coaches and teaching staff search for additional resources to teach the skills that are missing from the bilingual literacy components. During interviews, staff said that teachers also develop the bilingual instructional resources or translate the English literacy instructional resource on top of their teaching responsibilities.

The district also does not have a consistent process to ensure that teachers are trained in newly adopted instructional resources and materials. According to staff, the district used the English literacy instructional resource adopted during school year 2018–19 in kindergarten to grade 3, and only teachers who taught in those grades received training. During school year 2019–20, the district expanded the English literacy instructional resource to include students in prekindergarten and grades 4 to 6. However, staff said that teachers who provided instruction in those grades did not

receive training, with the exception of teachers that were new to the district.

Although Gonzales ISD's board policy does not require input from instructional and administrative staff for adopting instructional resources and materials, the lack of a formal process limits the district's ability to obtain feedback from knowledgeable staff on the instructional resources and materials they intend to purchase. Without an instructional resources and materials selection committee to evaluate the rigor of instructional resources and materials, staff cannot ensure that students receive quality instruction. Additionally, providing staff with a new instructional resource without ample training may limit their ability to use the instructional resource to its full potential.

Battle Ground Public Schools in Brush Prairie, Washington, has a comprehensive adoption process for instructional materials. Its Board Policy 2020P states that an instructional materials committee appointed by the superintendent will review instructional materials and provide a recommendation to the district's board of directors. The instructional materials committee members include teachers, administrators, parents, and appropriate content specialists selected from specific curriculum adoption committees. Battle Ground Public Schools also field tests the instructional resources before adoption to evaluate the effectiveness of curricular approaches and instructional materials in meeting district goals and student needs.

Gonzales ISD should develop an adoption process for instructional resources and materials that includes staff and parent input, adoption timelines, and adequate training.

The assistant superintendent and the board should develop and approve a detailed board policy that includes a process for selecting instructional resources and materials adoption committee members, adoption timelines, and a process for evaluating instructional resources and materials from vendors. Committee members should include teachers, principals, instructional coaches, and parents of students enrolled in the district. Instructional resources and materials adoption timelines should be based on TEKS standards updates and an evaluation of past adoptions by content area. The timeline also should include a period for field-testing the instructional resources and materials, including training, and teacher feedback. The assistant superintendent should oversee the progress of the instructional resources and materials adoption process and request regular input from staff on the need for additional training.

The district could implement this recommendation with existing resources.

Since the onsite visit, Gonzalez ISD has followed an instructional resources and materials adoption process that includes input from a committee made up of instructional staff and campus and district administrators. Committee members review and rate at least three viable instructional resources from different vendors and present their recommendation to the board at a public meeting. After the presentation, the board decides if the recommended instructional resources and materials are approved.

BEHAVIOR MANAGEMENT (REC. 7)

Gonzales ISD does not implement its behavior management model effectively, which leads to ineffective and inconsistent disciplinary practices districtwide.

The district uses positive behavioral interventions and supports (PBIS) as its behavior management model. However, many staff reported that the district uses only the component of PBIS that sets districtwide positive expectations and behaviors. The district selected six positive expectations and behaviors for staff and students to emulate and named this behavioral motto APACHE Way, after its mascot, the Apaches. Each letter in the first word of APACHE Way stands for a positive characteristic: Activity, Participate, Attitude, Communicate, Helping, and Effort. However, APACHE Way is not a comprehensive behavior management model. Many staff said that APACHE Way is not implemented uniformly throughout the district. Some staff reported not knowing that APACHE Way also is intended for staff, and others reported not knowing that the district had a behavior management model.

Principals meet with campus staff to determine how to implement APACHE Way at each campus. Campuses display posters to motivate students to follow APACHE Way. Some campuses recognize students who model the APACHE Way by awarding them a certificate or district reward currency, referred to as APACHE bucks, to purchase items in the campus reward store. Staff reported that the district focuses more on APACHE Way in the lower grades.

Teachers receive training on APACHE Way at the beginning of the school year, but principals can determine the additional behavior training that campus staff receive. The testing and behavior support coordinator trains teachers in behavior management and performs classroom observations when requested. Principals identify teachers to attend behavior

management training. Instructional coaches also offer teachers support in classroom management. During interviews, some principals reported holding campuswide behavior management trainings for staff, and others said they had not held such trainings. Other staff reported that the district does not enforce its behavior management model and that incoming teaching staff do not receive behavior management training.

During January 2019, Regional Education Service Center XIII (Region 13) performed an audit of the high school campus. The audit results showed that campus staff and students said they believe consequences for student misbehavior are not administered consistently. During review team's onsite visit, an assistant principal said that teachers follow a rubric to determine which behaviors to handle in the classroom and when to send students to the office. However, district staff and campus staff gave conflicting descriptions of how staff apply disciplinary measures. Some staff reported no consequences for student misbehavior at different campuses, and others said that student misbehavior was handled immediately.

Social and emotional learning (SEL) is a component of the district's behavior management model. However, some campus staff said that SEL is not supported throughout the district. For example, SEL instruction is not delivered consistently throughout the campuses and the SEL instructional resource at the high school is outdated. Additionally, staff reported that some campuses are planning to eliminate SEL instruction for school year 2020–21 because it is considered an elective and campus staff want to replace it with different courses.

As shown in **Figure 2–5**, the number of students disciplined for violating the student code of conduct increased overall from school years 2015–16 to 2018–19, and the number of incidents each year during this period increased steadily. Many incidents resulted in the placement of students in inschool suspension, out-of-school suspension, or the DAEP.

The district implemented only the component of PBIS that sets positive expectations and behaviors. Therefore, staff have not benefitted from other aspects of the model intended to equip them with skills to manage disruptive student behavior. Disruptive student behavior prevents students from receiving uninterrupted quality instruction, including the students who are not misbehaving.

The National Education Association published a policy brief, *Positive Behavioral Interventions and Supports: A Multi-tiered*

FIGURE 2–5
GONZALES ISD STUDENTS DISCIPLINED FOR VIOLATING
THE STUDENT CODE OF CONDUCT
SCHOOL YEARS 2015–16 TO 2018–19

YEAR	STUDENTS DISCIPLINED	INCIDENTS
2015–16	481	1046
2016–17	460	1125
2017–18	443	1188
2018–19	510	1343

SOURCES: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

Framework that Works for Every Student, 2014, which states that the implementation of PBIS is dependent upon the collaboration of the whole school community. Continuous staff development is crucial to proper implementation. Effective implementation of PBIS also includes universal screening, continuous progress monitoring, data-based decision making, implementation fidelity, and evidence-based interventions. The TEA website offers districts various supports and curricula on SEL instruction for different grade levels.

Gonzales ISD should provide staff with continuous training on the district's behavior management model and monitor for implementation.

The testing and behavior support coordinator should:

- collaborate with campus principals to align the behavior management model across the campuses and provide training for all campus staff;
- coordinate with the assistant superintendent to research and adopt an SEL instructional resource for the district that supports prekindergarten to grade 12: and
- monitor the behavior management model implementation at the campuses regularly and offer staff additional support as needed.

A fiscal impact is not assumed until the district selects an SEL instructional resource to adopt.

ENGLISH LEARNER INSTRUCTION (REC. 8)

Gonzales ISD does not support English as a second language and bilingual instruction equitably, which limits English learners' academic growth.

Gonzales ISD's school year 2018–19 English Language Learner Department handbook states that the district uses

FIGURE 2–6
GONZALES ISD COMPARISON OF ENGLISH AND SPANISH LITERACY INSTRUCTIONAL RESOURCES SCHOOL YEAR 2019–20

GRADE LEVELS AND COURSES	RESOURCES	USES/ADDITIONAL INFORMATION
Kindergarten to grade 6 English	Fountas & Pinnell The Classroom	Guided Reading
		 Shared Reading
		 Word Study
		 Interactive Read Alouds
		Mini Lessons
		Continuum
Kindergarten to grade 6 Spanish	(1)	Guided Reading
		 Shared Reading (Authentic)
		 Word Study (El Camino/Wrap)
		• Tier I Toolkit for Comprehension Strategies

Note: (1) Gonzales ISD does not have a comprehensive Spanish literacy instructional resource listed in its literacy resources catalog. Source: Gonzales ISD, March 2020.

the dual two-way model for bilingual instruction and the dual one-way model for English as a second language (ESL) instruction. The handbook states that dual two-way and dual one-way models are used for prekindergarten to grade 4, and the dual two-way model is used for grades 5 and 6. However, staff said during interviews that the district uses the dual-two way model in the classroom for prekindergarten to grade 6. Other staff said that grade 5 English learner (EL) students attend an ESL class at the end of the school day. The handbook does not include a model of instruction for grades 7 to 12, but staff said that the higher-level grades receive ESL instruction. Organization charts provided by the district for school year 2019–20 do not show an English Language Learner Department. The instructional coach/bilingual facilitator supports EL instruction districtwide.

From October 2019 to December 2019, the district conducted a dual-language audit to evaluate its dual-language program with a focus on its dual two-way model. The dual two-way model is based on the ratio of English-proficient students to EL students. The district's dual-language audit states that the optimal ratio of students for the dual two-way model is one English proficient student for every two EL students. The audit showed that the district's dual-language model is not aligned efficiently to meet its EL population's needs, and that the ratio of English proficient to EL students is not optimal. Staff said that campuses do not have the necessary bilingual certified staff to follow the district's dual two-way model. At the time of the onsite visit, Gonzales ISD was evaluating a dual one-way model to address EL students' needs based on the audit's findings. Staff said that the Curriculum and Instruction Department are also evaluating

the professional development and resources staff would need to teach the dual one-way model with fidelity.

Additionally, Gonzales ISD does not provide EL students with resources equivalent to those available to non-EL students. **Figure 2–6** shows the differences between the instructional resources available for English and Spanish literacy, specifically, that the district lacks a comprehensive Spanish literacy instructional resource to support its EL population.

The goal of dual-language programs is for students to be bilingual and literate in English and another language. However, the district does not provide adequate Spanish reading materials for its EL students. This negatively affects student instruction, particularly in the guided reading component, according to staff, who reported that the district has limited Spanish reading resources. The district does not have an instructional coach whose focus is on bilingual instruction, but the instructional coach/bilingual facilitator helps staff find resources. Moreover, the district has one position that supports bilingual and ESL instruction districtwide, the instructional coach/bilingual facilitator, which is a dual-role position.

Campus leadership staff said that the district does not have an adequate number of bilingual and ESL certified teaching staff. Paraprofessionals assist students because of the lack of certified bilingual and ESL teachers. The chief human resources officer and other staff said that the district has difficulty attracting and retaining bilingual and ESL certified teachers, although the district does pay an annual \$500 to \$750 stipend to such staff. Bilingual staff receive a \$6,000

signing bonus and a \$3,000 stipend. The district has obtained a waiver from TEA authorizing noncertified staff to instruct EL students, primarily for grades 5 to 12. The instructional coach/bilingual facilitator said that teaching staff pursuing ESL certification attend ESL Academy to prepare them for the certification exam. At the time of the review team's onsite visit, the majority of staff participating in ESL Academy had not completed the certification exam.

Many staff expressed concerns about the ratio of EL students to English proficient students in classrooms. Staff said that the proper ratio for bilingual instruction is not occurring at the classroom level, and some classroom ratios resemble an ESL class, or a dual one-way model. For example, in one classroom, five-sixths of the student population was limited English proficient. At another campus, staff said that the limit of EL students in a classroom is 12. ESL teaching staff receive varying levels of support depending on their certification and the campus where they teach. Staff said that there are few aides to cover multiple classes and grade levels, and that the district does not have bilingual special education teachers, which diminishes the educational experience provided to students who are identified as EL and special education.

At the time of the onsite visit, no students had exited EL status during school year 2019-20. Less than 10 students total exited EL status during school years 2017-18 and 2018–19. Staff said that the majority of students exiting EL status are in grade 1 and identified the STAAR test as a factor in the decrease of students exiting EL status after grade 1. Starting in grade 3, students must also pass the STAAR English language reading test as a criterion for exiting EL status. Staff said that if students do not pass the exam or are successful with their accommodations, they are not moved from dual instruction. Student performance on the TELPAS is a factor in determining if they are ready to exit EL status. Staff said that many students missed the benchmark in school year 2018-19 due to low marks in the speaking portion of the TELPAS. During school year 2019-20, staff have emphasized speaking practice to help EL students demonstrate proficiency on the TELPAS.

By not providing adequate resources, including a comprehensive instructional resource, necessary materials, and certified staff, the district is not implementing its dual-language model effectively to prepare EL students for English-only instruction. Additionally, by not supporting teaching staff adequately, the district is likely to lose staff.

The Intercultural Development Research Association (IDRA) is a nonprofit organization that provides research, policy analyses, training, and information to school districts and identifies best practices in public education. Along with sufficient professional development, the IDRA publication *Leadership for ESL Teacher Recruitment and Retention* states three ways to improve the availability of qualified teachers for EL students:

- develop career ladder programs in partnership with local universities to encourage paraprofessionals to become certified teachers in bilingual education or ESL:
- renew or continue student teacher programs that, through university partnership, certify teachers from other countries in bilingual or ESL instruction; and
- continue partnerships with local universities to recruit students in traditional bilingual teacher preparation programs.

Gonzales ISD should research dual-language one-way models and evaluate additional district needs to ensure that the model selected is implemented with fidelity.

The assistant superintendent should collaborate with the instructional coach/bilingual facilitator, the campus language proficiency assessment committee (LPAC) administrator, and campus LPAC chairs to identify a dual-language one-way model and staff training required to implement the model with fidelity. The assistant superintendent should coordinate with campus principals, the instructional coach/bilingual facilitator, bilingual or ESL certified teachers, and general education teachers to research and adopt a Spanish literacy instructional resource that is aligned to the TEKS standards.

A fiscal impact is not assumed until the district evaluates the instructional resources and staff needed to support EL students.

Since the onsite visit, Gonzales ISD adopted a new instructional model for its dual language program; the Transitional Bilingual Early Exit Program Model was implemented during school year 2020–21.

SPECIAL EDUCATION SERVICES (REC. 9)

Gonzales ISD does not provide adequate instructional support to students served by special education.

Gonzales ISD uses a continuum of services to support its special education population. These services range from lifeskills classes to inclusion services, which enable special education students to spend as much time as possible in the general classroom, and providing certain students alternative instruction in another setting, but the implementation varies among the campuses. Each student identified as needing special education services has an individualized education program (IEP) that lists measurable goals for the school year and the support the student will receive. The IEP also specifies the number of minutes of support students will receive during the school year. The district has had an increase in students identified as needing special education services. **Figure 2–7** shows the special education population from school years 2017–18 to 2019–20.

Gonzales ISD students change campuses every two years until they reach high school, and each campus provides students with support based on the number of special education staff at each. For example, one campus has one special education teacher serving 39 special education students. Staff said that the number of special education staff has remained constant at the primary campuses while the special education population has increased. The high school hired two special education staff for school year 2019-20. Additionally, staff said that the class sizes increased after TEA approved the district's application as a district of innovation. Other staff said that special education students are concentrated in certain classrooms, in which they may constitute half the students in the class. Staff reported that, due to insufficient staff, a special education teacher at the intermediate campus separated the classroom into two groups and teaches each group a different subject simultaneously. Teaching staff do not provide input on campus master schedules.

During onsite interviews, staff said that students served by special education are not receiving the support they need due to limited staffing. Moreover, some special education staff also fill other roles within the district. At the lower grade-level campuses, some support staff work half the day, which leaves teachers without support for the remainder of the day.

At the high school, most special education staff who perform inclusion services are also athletic coaches, which limits the time they can devote to special education students in their regular classrooms. Staff said that coaches are on campus for half the day due to their athletic responsibilities and are unable to provide consistent support for special education students. Additionally, not all coaches collaborate routinely

FIGURE 2–7
GONZALES ISD ENROLLMENT OF SPECIAL EDUCATION
STUDENTS
SCHOOL YEARS 2017–18 TO 2019–20

YEAR	SPECIAL EDUCATION STUDENTS
2017–18	323
2018–19	324
2019–20 (1)	406

Note: (1) As of March 2020, the school year 2019–20 Texas Academic Performance Report was not available. Gonzales ISD provided the special education student count.

Sources: Texas Education Agency, Texas Academic Performance Report, school years 2017–18 and 2018–19; Gonzales ISD, March 2020

with the general education staff to be aware of the lesson or to notify staff if they will be unable to provide inclusion supports. Staff said that special education students who do not receive inclusion support in the classroom attend the high school learning lab to receive those supports. The learning lab is where any student can go for homework help. Other staff stated that some special education support staff do not perform their inclusion responsibilities and visit with the teachers only at the end of the six-week grading period to ensure that proper documentation is submitted.

If special education staff are not able to assist during class time, special education students at the intermediate campus are taken to another classroom at the end of the day to ensure that they receive the supports they need for the necessary amount of time. Staff stated that additional special education staff would enable campuses to provide targeted instruction, such as small group instruction or reteaching certain lessons for special education students.

Although the district has various services to support special education students, supports are not provided consistently at the campuses. The district aims to support special education students with the objective of keeping students in the classroom with their peers as much as possible. However, staff stated that not all campus staff are supportive of the most inclusive model, co-teaching, in which general and special education teachers work together in the same classroom. Support for co-teaching also varies by campus. For example, at the elementary campus a special education support staff was reprimanded by the principal for co-teaching. Additionally, staff reported that some general education teachers are not invested in the admission, review, and dismissal (ARD) process, through which a special education student's IEP is evaluated. The U.S. Code,

Title 20, Chapter 33, Section 1414(d)(3)(C), requires general education teachers to provide input in developing the IEP, but staff stated that input at times is lacking or minimal.

TEA identified Gonzales ISD's special education determination status as Needs Intervention for school vears 2017-18 and 2018-19. The school year 2018-19 Texas Academic Performance Report shows that special education students are performing at less than the district average. Special education staff participate with general education staff in professional learning communities to review student data, including six-week tests and the midyear practice STAAR tests. The director of special programs said that the district started providing targeted professional development for special education staff during school year 2019-20. Instructional coaches also support special education staff. However, staff reported that the district is not providing special education students with rigorous instruction. Staff said that special education support staff would benefit from additional training on how to provide supports for special education students. General education teaching staff are not differentiating instruction, and high-school staff reported that school year 2019–20 is the first year staff have been asked to differentiate instruction for special education students.

Special education students who do not receive the necessary academic supports will continue to progress academically behind their peers. By authorizing each campus to determine the special education staffing level and the supports that students receive, the district is not ensuring that students receive equitable supports.

The Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter D, Section 89.63, requires each school district to provide services with special education personnel to students with disabilities to meet those students' special needs in accordance with federal regulations. Instructional settings must be based on the students' individual needs, as stated in their IEPs. These services include direct instruction. helping teachers, team teaching, co-teaching, interpreters, education aides, curricular or instructional accommodations, special materials, positive classroom behavioral interventions and supports, and a limited ratio of students to instructional staff. Qualified special education personnel must be involved in implementing a student's IEP through the provision of necessary direct, indirect, and support services to the student and the student's regular classroom teachers to enrich the regular classroom and enable student success.

The National Education Association published 6 Steps to Successful Co-Teaching: Helping Special and Regular Education Teachers Work Together, which includes the following steps for successful implementation of a co-teaching model:

- take time to establish a relationship;
- identify teaching styles and use them to develop a cohesive classroom;
- · discuss strengths and weaknesses;
- · discuss IEPs and regular education goals;
- formulate a plan of action and act as a unified team; and
- · take risks and grow as professionals.

Carol Ann Tomlinson discusses teacher behaviors that support effective differentiated instruction in *Differentiated Classroom: Responding to the Needs of All Learners, 2nd Edition*, 2014. Tomlinson states that "teachers in differentiated classes use time flexibly, call upon a range of instructional strategies, and become partners with their students so that both what is learned and the learning environment are shaped to support the learner and learning. They do not force-fit learners into a standard mold; these teachers are students of their students. They are diagnosticians, prescribing the best possible instruction based on both their content knowledge and their emerging understanding of students' progress in mastering critical content."

Gonzales ISD should evaluate the effectiveness of the district's special education program, including staffing and instructional delivery.

The director of special programs should provide training for principals and teaching staff on the district's support services for special education students and the importance of teacher input in the ARD process. The director of special programs and the assistant superintendent should:

- collaborate with special and general education teachers and campus principals to:
 - determine an instructional delivery system that provides special education students the least restrictive learning environment and access to high-quality instruction; and
 - evaluate the supports special education students receive from special education staff who have dual roles within the district to ensure that students

consistently receive high-quality instruction and support; and

• train teaching staff on effective differentiated instruction for special education students.

Campus principals should coordinate with school counselors and general and special education teachers to develop campus master schedules with an equitable ratio of special education students to general education students that meets student needs.

A fiscal impact is not assumed until the district determines the special education staff to student ratio and the accommodations students should receive.

COUNSELOR ROLE AND RESPONSIBILITIES (REC. 10)

Gonzales ISD's school counselors have multiple duties, which limit their abilities to support students effectively.

For school year 2019–20, each campus has one full-time school counselor, except the high school, which has two full-time school counselors and one part-time licensed professional counselor. The school counselor at Gonzales Primary Academy works part time. The assistant superintendent said that the district lacks an adequate number of counselors.

The Texas Counseling Association, an organization focused on improving the counseling profession to increase access to mental health services in Texas, recommends a school counselor-to-student ratio of 1 to 350. **Figure 2–8** shows that Gonzales ISD has more students per counselor compared to the state average and industry recommendations.

A Gonzales ISD job description for school counselors states that their primary responsibilities are to support students academically, counsel students and help them manage emotions and learn interpersonal skills, collaborate with campus staff and parents to provide students with needed supports, and help students plan for life after high school. However, staff reported that counselors devote from 60.0 percent to 80.0 percent of their time performing administrative tasks and the remainder of the time counseling students. According to staff, the allocation of time to various duties and the responsibilities of school counselors vary by campus and may include the following responsibilities:

- developing campus master schedules, assembling rosters, performing schedule changes;
- · monitoring student graduation requirements;

FIGURE 2–8
GONZALES ISD STUDENTS-TO-COUNSELOR RATIO
SCHOOL YEAR 2018–19

ENTITY	STUDENTS PER COUNSELOR (1)
Gonzales ISD (2)	489.8
State	417.2
Texas Counseling Association recommendation	350.0

Notes:

- A part-time counselor position is considered 0.5 full-timeequivalent position.
- (2) During school year 2018–19, Gonzales ISD employed 6.5 full-time-equivalent counselor positions.

Sources: Legislative Budget Board School Performance Review Team, March 2020; Texas Education Agency, Texas Academic Performance Report, school year 2018–19; Texas Counseling Association, February 2018.

- assisting students in crisis and social emotional learning;
- disciplining students;
- collaborating with campus staff on attendance monitoring and the campus truancy process;
- identifying at-risk students through interviews and evaluating their status throughout the school year;
- facilitating special education referrals and performing classroom observations;
- managing plans that guide support for students with disabilities and protect them from discrimination;
- performing classroom observations;
- participating in response to intervention teams;
- attending professional development;
- overseeing school initiatives such as the Red Ribbon Week drug prevention campaign and the holiday reward store, which serves as a behavior reward system;
- participating in campus leadership meetings and various committees including:
 - attendance committee;
 - master schedule committee;
 - · discipline committee; and
 - · campus improvement committee; and

· coordinating TELPAS, TELPAS Alternate, and STAAR Alternate standardized tests, and the Texas Success Initiative Assessment, which measures the college readiness of high school students.

According to staff, high school counselors stay at the campuses late during the week and often work weekends to complete their responsibilities. During the review team's onsite visit, the district informed high school counselors that they would administer additional standardized tests, including the SAT and ACT college admissions tests and the Preliminary SAT, a practice standardized college admissions test. Staff reported that the district is placing more emphasis on career, college, and military readiness (CCMR). According to TEA, CCMR counseling and advising services may include the following elements:

- · activities to help students identify courses that will prepare them for a specific career or college degree plan;
- · activities to provide awareness and support for students who wish to enlist in the military;
- information sessions regarding the U.S. Department of Education's Free Application for Federal Student Aid, college entrance requirements, career awareness and exploration activities, work-based learning opportunities, and developing a college degree plan; and
- · outreach sessions for students and parents regarding CCMR, including participation in courses with college credit earning potential (i.e., Advanced Placement, International Baccalaureate, and dualcredit courses) and earning career and technical education industry-based certifications.

Staff said that Gonzales ISD school counselors belong to a counselor cooperative at Region 13, where they receive additional training and support to advance the district's counseling services.

School counselors' primary role is to support students' academic, social and emotional, and personal needs. School counselors at Gonzales ISD have been assigned additional duties that limit their ability to focus on student needs. Additionally, some responsibilities, such as disciplining students, contrast with the school counselor's role of providing social and emotional support to students and may reduce the willingness of students to reach out for support from the counselor. This concern is heightened by having only one counselor per campus, with the exception of the high school.

The Texas Education Code, Section 33.005, requires the school counselor to coordinate with the school faculty and staff, students, parents, and the community to plan, implement, and evaluate a comprehensive school counseling program that conforms to the Texas Model for Comprehensive School Counseling Programs, developed by the Texas Counseling Association and last published in 2018. The school counselor must structure the program to include the following elements:

- · a guidance curriculum to help students develop their full educational potential, including the student's interests and career objectives;
- · a responsive services component to intervene on behalf of any student whose immediate personal concerns or problems put the student's continued educational, career, personal, or social development at risk;
- · an individual planning system to guide a student in planning, monitoring, and managing the student's own educational, career, personal, and social development; and
- system support for the efforts of teachers, staff, parents, and other members of the community in promoting the educational, career, personal, and social development of students.

Additionally, the American School Counselor Association (ASCA), whose goal is improving school counseling programs and researching effective school counseling practices, has identified the optimal ratio of counselors to students at 1 to 250. A Study to Measure the Impact of School Counselor Ratios on Student Outcomes, 2018, a publication by the ASCA's research center, links a ratio of 1 to 250 to decreased student absenteeism and disciplinary incidents, and increased achievement on standardized tests.

Gonzales ISD should evaluate whether the current roles and responsibilities of school counselors limit their abilities to support students.

Campus principals should coordinate with their respective school counselors to align their current role and responsibilities to their job descriptions. The district should work to reach an optimal counselor to student ratio of 1 to 350 as recommended by the Texas Counseling Association to ensure students receive adequate academic, socioemotional, and personal support.

A fiscal impact is not assumed until the district determines an optimal counselor to student ratio that would support students' needs.

INSTRUCTIONAL MODEL (REC. 11)

Gonzales ISD does not implement its instructional model effectively, which impedes student achievement.

Gonzales ISD uses a response to intervention (RtI) model for its instructional delivery and identification of students in need of additional support, including special education services. TEA describes RtI as an approach that campuses use to help all students, including struggling learners. RtI separates instruction into the following tiers:

- Tier 1 Teachers deliver high-quality core class instruction aligned with the TEKS standards to all students. The majority of students are successful in Tier 1;
- Tier 2 Students who are not successful in Tier 1
 are identified to receive additional supports in Tier 2.
 Additional supports focus on small group interventions
 that are scientific research-based programs or strategies
 that support Tier 1 instruction; and
- Tier 3 Students who are not successful in Tiers 1 and 2 receive specific, customized individual or small-group instruction. Additionally, Tier 3 aims to instruct students with identified academic or behavior difficulties.

During interviews, staff reported that Tier 1 instruction is not occurring consistently and does not align to the TEKS standards. Staff do not have additional resources to support student in Tiers 2 and 3. Staff reported a lack of understanding of the RtI process. Other staff reported that students were being pulled out during Tier 1 instruction of core subjects. Alternately, paraprofessional staff who provide instructional support to students sometimes receive additional responsibilities, such as covering for an absent teacher, which limits their ability to support student instruction. Moreover, staff reported that the lack of rigor in instructional delivery demonstrates low expectations for students, and many said that rigor in instructional delivery could be improved. Other staff reported that campuses are not coordinating the vertical alignment of instruction, which is intended to ensure that promoted students are ready for the next grade level.

Gonzales ISD students attend a different campus every two years during the pre-high school grades, and each principal determines instructional delivery on their campus. Additionally, the district has a high principal turnover rate. For example, staff reported that a principal was removed from the position for attempting to implement an instructional model that staff resisted. For school year 2019–20, three of the six principals were new to their campuses. Gonzales East Avenue Primary School had a principal change midyear. The intermediate campus has had seven assistant principals and five principals during the past three years. The chief human resources officer reported that the district had 65 new teachers for school year 2019–20, and some staff attribute leadership changes to teaching staff turnover.

Without consistent and effective collaboration among principals, instructional delivery will be different at each campus. Additionally, students will receive inconsistent supports, which impedes student achievement.

The Learning Policy Institute conducts high-quality research to improve education policy and practice. A best practice derives from the institute's review of principal turnover, which states five strategies for principal retention:

- providing high-quality professional learning opportunities, both initial preparation and inservice, to give principals the necessary skills and competencies for school leadership;
- improving working conditions to foster principals' satisfaction with their roles:
- ensuring adequate and stable compensation for principals, commensurate with the responsibilities of the position, to value principals' contributions and to attract and retain effective leaders;
- supporting decision-making authority in school leadership to allow principals to shape decisions and solutions to address the specific needs of their staff and students; and
- reforming accountability systems to include incentives that encourage effective principals to stay in challenging schools to support teachers and improve student learning.

Additionally, the RtI Action Network provides resources for school districts to develop and implement RtI models. The RtI Action Network is a program of the National Center for Learning Disabilities that guides school districts in implementing RtI models effectively.

Gonzales ISD should provide ongoing training to principals and teachers on the district's response to intervention model.

The assistant superintendent should collaborate with campus principals to evaluate RtI implementation at each campus and develop a standard for implementation across the campuses. Additionally, the district should provide RtI training to incoming principals to ensure program consistency across the campuses. The superintendent and assistant superintendent should establish a process for principal retention that includes ongoing high-quality professional development, positive working conditions, adequate compensation, and decision-making flexibility within the scope of the district's programs.

The district could implement this recommendation with existing resources.

Since the onsite visit, Gonzales ISD developed an RtI Guidance Document draft for campus staff that describes district practices, available instructional and behavioral resources, and contains examples of forms used to evaluate student progress. District staff said campus administrators and staff continue to collaborate on the RtI Guidance Document during school year 2020–21.

STAFF PROFESSIONAL DEVELOPMENT (REC. 12)

Gonzales ISD does not have an effective process for providing professional development to district staff.

The district's curriculum and instruction strategic plan for school years 2017–18 to 2021–22 states that Gonzales ISD will provide purposeful professional development that is collaborative and focused on providing teachers and administrators the knowledge and skills necessary to implement:

- best practices for the benefit of all stakeholders in the community;
- differentiation to meet diverse student needs;
- responsive teaching strategies for students of all backgrounds; and
- reflective practices for professional growth.

During school year 2018–19, the district provided staff professional development on the data-driven instruction, the district's curriculum management system,

instructional models, universal screener assessments that evaluate students' academic level, and state accountability. Campuses provide additional professional development to staff as needed.

According to the assistant superintendent, the district determines staff professional development through student achievement data and recommendations from principals. The Curriculum and Instruction Department and Region 13 provide most district professional development. Principals are provided budgets for professional development based on campus needs. Multiple district and campus staff reported that the district is receptive to staff requests to attend professional development. At some campuses, principals request input from their instructional staff on which professional development should be provided. Several district and campus staff also said that they are encouraged to seek professional development.

During interviews, staff said that some professional development trainings were conceived as "train-the-trainer" opportunities, through which a few staff who attended would convey the information to the rest. For example, when the TEKS standards for literacy changed, 10 instructional staff attended the professional development training. However, staff reported that those who attended did not train the rest of the staff at each campus subsequently.

Several staff said that the district has not offered additional professional development on the English literacy instructional resource or the district's student progress data analysis software. Other staff said that professional development for teaching staff often is attended poorly.

Gonzales ISD had a 20.6 percent teacher turnover rate for school year 2018–19, higher than the state average of 16.5 percent. Thirty percent of the district's teachers have less than five years of teaching experience, and 19.0 percent have from six years to 10 years of experience.

Inconsistent staff professional development results in student instruction that can vary among classrooms and impede student achievement. Additionally, a lack of high-quality professional development can increase teacher turnover.

The Learning Policy Institute states that effective professional development:

- · is content-focused;
- incorporates active learning utilizing adult learning theory;

- supports collaboration, typically in jobembedded contexts;
- uses models and modeling of effective practice;
- · provides coaching and expert support;
- · offers opportunities for feedback and reflection; and
- is of sustained duration.

Gonzales ISD should guide professional development for instructional staff based on the district's academic goals and student achievement data.

The assistant superintendent should collaborate with the instructional officers to develop an online survey for instructional coaches and teaching staff to identify areas where additional professional development is needed. The director of technology should assist the assistant superintendent in publishing the survey online and communicating to staff of its availability for them to respond. The assistant superintendent and the instructional officers should analyze the survey responses and use the results to identify professional development for staff. Professional development should align with the district's goals, curriculum, instructional resources and materials, and student achievement data; support teacher and student needs; and support effective adult learning. The assistant superintendent and the instructional officers should develop a timeline to provide professional development to staff regularly and request staff input on the professional development to ensure successful outcomes.

A fiscal impact is not assumed until the district evaluates staff professional development needs and determines which professional development staff will receive.

ADDITIONAL OBSERVATIONS

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

NEW TEACHER MENTORSHIP

Gonzales ISD does not have a process to support its new teachers. The district had 65 new teachers during school year 2019–20. District leadership staff said that campus principals coordinate with new teachers to welcome them to the campus, but there is no continuous mentoring. Additionally,

new teachers do not have set dates or times to meet with a mentor to learn about available resources or discuss concerns. At some campuses, teaching staff assume unofficial mentor roles for staff in their departments. However, staff said that no one follows up with new teachers at some campuses. The Education Commission of the States is a nonprofit organization that focuses on education policy. In 2016, it published *Mitigating Teacher Shortages: Induction and Mentorship*, a policy brief that links an increase in teacher retention and student academic achievement to an effective mentoring program. Gonzales ISD should consider developing a mentoring program to support new teachers and increase teacher retention.

DISCIPLINARY ALTERNATIVE EDUCATION PROGRAM

PROMOTING ACADEMIC PROGRESS

Gonzales ISD does not have an effective process to promote academic progress for students placed in the DAEP. The district contracts with Nixon-Smiley Consolidated ISD (CISD) to provide DAEP services for student instruction. Nixon-Smiley CISD has access to the Gonzales ISD curriculum and coordinates weekly with principals or assistant principals on additional needs for students. However, several campus staff reported that students returning from the DAEP are behind their peers academically, and some are failing their courses. Gonzales ISD should evaluate its partnership with Nixon-Smiley CISD to ensure that DAEP students receive adequate instruction.

TRANSITION BACK TO CAMPUS

Gonzales ISD does not have a uniform process to transition students from the DAEP back to their campuses. The principal oversees the transition process at each campus; therefore, the process is not consistent. Some campuses hold a transition meeting with each student to discuss behavior expectations and goals. The meeting includes a counselor, a core subject teacher, and the principal or assistant principal. Parents or guardians also may be included. At the junior high school, an athletic coach sometimes attends the meetings to encourage returning students to join an athletic activity; this is intended to increase student participation and engagement at the campus. Additionally, staff said that counselors at the junior high school continue to meet weekly with transitioning students for three weeks. Staff said that some students returning from the DAEP are placed in the in-school suspension (ISS) classroom to ease the transition process. After students return to their

general education classrooms, they may take breaks as needed in the ISS classroom. The number of students placed in the DAEP has increased from 81 to 84 from school years 2017–18 to 2018–19. The number of incidents increased from 92 to 103 during the same period, indicating that some students were placed in the DAEP more than once. The testing and behavior support coordinator should collaborate with campus principals and school counselors to develop a transition process that decreases the number of repeated DAEP placements.

LIBRARY SERVICES

Gonzales ISD has one certified librarian that oversees the district libraries. The district librarian serves primarily at the high school and travels to other campuses during the afternoon. The district librarian also supervises the paraprofessionals that work in the other five campuses. The paraprofessionals are full-time district staff, but they do not work in the library full time. Depending on the campus, paraprofessionals may conduct interventions, perform small-group instruction, or hold a second position at the district, such as a bus driver. The high school does not have a paraprofessional to assist the district librarian; therefore, the high school library is closed when the district librarian is at another campus. During calendar year 2013, the American Association of School Librarians documented research on the positive effects of school libraries on student academic achievement. The district should evaluate the staffing levels at its libraries to ensure that students have access to them.

REGISTRAR ROLE AND RESPONSIBILITIES

Campus registrars in Gonzales ISD have multiple responsibilities and perform extra duties when campus office staff are absent. Registrar responsibilities include student registration and withdrawals, campus purchases, scheduling, coordinating with attendance clerks on student attendance reports, processing student record requests, managing campus activity funds, translating when needed, and interviewing homeless students to identify necessary resources for them. When campus secretaries or attendance clerks are absent, registrars become substitutes for those positions. Staff said that, at certain campuses, registrars are assigned the additional duty of serving as the secretary for the principal or assistant principal. Campus principals should evaluate registrar responsibilities and determine whether additional duties limit registrars' ability to perform their job responsibilities efficiently.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

3. BUSINESS SERVICES MANAGEMENT

For school year 2019–20, Gonzales Independent School District (ISD) adopted a budget of approximately \$26.2 million. With approximately \$28.7 million in revenue, the district estimates it will add \$2.5 million to its fund balance.

The chief financial officer (CFO) and the business manager manage Gonzales ISD's cash and investments. The Gonzales ISD Board of Trustees (board) has designated these positions as the district's investment officers. Pursuant to the Texas Public Funds Investment Act, the Texas Government Code, Chapter 2256, these positions develop and maintain a portfolio of \$16.8 million in investments for Gonzales ISD that provide safety from risk, liquidity to support cash requirements, and a yield providing a reasonable rate of return.

Gonzales ISD Board Policy CH (LEGAL) incorporates the Texas Education Code, Section 44.031, requirements for competitive bidding for the purchase of goods and services, except contracts for the purchase of produce or vehicle fuel of \$50,000 or more in the aggregate for each 12-month period of the district's fiscal year. Gonzales ISD Board Policy CH (LOCAL) establishes a threshold of less than \$75,000 for purchases that can be made without board approval.

FINDINGS

- ♦ Gonzales ISD's campus budgeting process is not aligned to district improvement or campus improvement plans.
- ♦ Gonzales ISD's process for developing and monitoring departmental budgets is inefficient.
- ♦ Gonzales ISD lacks a long-term financial planning process.
- ♦ Gonzales ISD does not manage and track district assets effectively.
- Gonzales ISD lacks an effective process to manage its master vendor list.
- Gonzales ISD does not have documented procedures to guide the payroll function of the Finance Department.

RECOMMENDATIONS

♦ Recommendation 13: Expand on the existing budget development process and ensure

that it is aligned to the district and campus improvement plans.

- ♦ Recommendation 14: Implement zero-based budgeting for departments and establish budgetmonitoring guidelines for department supervisors.
- ♦ Recommendation 15: Develop and implement a long-term financial plan.
- ♦ Recommendation 16: Develop and implement a comprehensive management system to identify, record, inventory, and track district assets.
- ♦ Recommendation 17: Review and update the district's vendor master list annually.
- ♦ Recommendation 18: Establish comprehensive written procedures for payroll duties.

BACKGROUND

An independent school district's business services functions include financial management, asset and risk management, and purchasing. Larger districts typically have staff specifically dedicated to each of these three financial areas, and smaller districts assign staff multiple financial responsibilities.

Financial management is dependent on a district's organizational structure. Budget preparation and administration are financial management functions that are critical to overall district operations. These functions include budget development and adoption; oversight of expenditure of funds; and involvement of campus and community stakeholders in the budget process. Managing accounting and payroll includes developing internal controls and safeguards, reporting account balances, and scheduling disbursements to maximize funds. Management of this area includes segregation of duties, use of school administration software systems, and providing staff training.

Managing investments includes identifying those with maximum interest-earning potential while safeguarding funds and ensuring liquidity to meet fluctuating cash flow demands. Forecasting and managing revenue include efficient tax collections to enable a district to meet its cash flow needs, earn the highest possible interest, and estimate state and federal funding. Capital asset management involves

identifying a district's property (e.g., buildings, vehicles, equipment, etc.) and protecting it from theft and obsolescence. Insurance programs cover staff health, workers' compensation, and district liability.

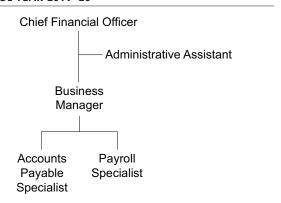
An independent school district's asset and risk management function controls costs by ensuring adequate protection against significant losses with the lowest possible insurance premiums. This protection includes the identification of risks and methods to minimize their impact. Risks can include investments, liabilities, capital assets, and insurance. Managing assets and risk is dependent on the organizational structure of the district.

An independent school district's purchasing function provides quality materials, supplies, and equipment in a timely, cost-effective manner. Purchasing includes identification and purchase of supplies, equipment, and services needed by the district, and the storage and distribution of goods.

School districts in Texas also are required to follow federal and state laws and procedures applicable to purchasing. The purposes of competitive bidding requirements in the Texas Education Code, Section 44.031, are to stimulate competition, prevent favoritism, and secure the best goods and services needed for district operations at the lowest possible price. The Texas Education Agency (TEA) developed a comprehensive purchasing module in the Financial Accountability System Resource Guide (FASRG), available as a resource to school districts.

Gonzales ISD's CFO oversees the Finance Department, which is responsible for the district's accounting, payroll, purchasing, and risk-management functions. The CFO also serves as the financial adviser to the superintendent and the board. The Finance Department consists of the CFO, the business manager, an accounts payable specialist, a payroll specialist, and an administrative assistant. The CFO supervises the business manager and the administrative assistant. The business manager oversees payroll, purchasing, accounts payable, accounts receivable, and bank reconciliation and monthly accounting. The accounts payable specialist

FIGURE 3–1
GONZALES ISD FINANCE DEPARTMENT
SCHOOL YEAR 2019–20



Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

maintains accounting records and processes vendor invoices, and the payroll specialist processes payroll. **Figure 3–1** shows the organization of Gonzales ISD's Finance Department.

Figure 3–2 shows Gonzales ISD's fund balances for school years 2016–17 to 2018–19. A fund balance is the amount of district assets in excess of liabilities. These assets could include investments, delinquent taxes, accounts receivable, and inventories.

TEA recommends a minimum unrestricted fund balance of two-and-a-half months of approximately operating expenditures. Gonzales ISD's fund balance did not meet this standard for school years 2016-17 and 2017-18. However, the district met this standard for school year 2019-20 because the school year 2018–19 ending fund balance increased 105.7 percent. The school year 2018-19 ending fund balance is the school year 2019-20 beginning fund balance. This increase was due partially to a tax ratification election held by the district in August 2018 that increased Gonzales ISD's maintenance and operations (M&O) tax rate. The increase in M&O taxes generated more than \$1.0 million in additional revenue annually to Gonzales ISD's general fund.

Figure 3–3 shows Gonzales ISD's actual financial data from school years 2016–17 to 2018–19 and budgeted financial data for school year 2019–20. The two highest expenditure

FIGURE 3–2
GONZALES ISD GENERAL FUND BALANCES, SCHOOL YEARS 2016–17 TO 2018–19

CATEGORY	2016–17	201 <i>7</i> –18	2018–19
Beginning Fund Balance	\$7,457,719	\$3,946,191	\$3,688,033
Ending Fund Balance	\$3,946,191	\$3,688,033	\$7,584,493
Increase/(Decrease)	(\$3,511,528)	(\$258,158)	\$3,896,460

Source: Texas Education Agency, Public Education Information Management System Financial Data, school years 2016–17 to 2018–19.

FIGURE 3–3
GONZALES ISD ACTUAL AND BUDGETED FINANCIAL DATA
SCHOOL YEARS 2016–17 TO 2019–20

CATEGORY	2016–17 ACTUAL	2017-18 ACTUAL	2018-19 ACTUAL	2019–20 BUDGETED
Revenue				
Local Tax	\$13,245,675	\$14,472,874	\$16,449,730	\$17,294,216
Other Local and Intermediate	\$314,329	\$582,240	\$502,736	\$294,067
State	\$8,724,960	\$9,368,716	\$8,384,542	\$10,477,364
Federal	\$496,777	\$611,361	\$700,862	\$643,920
Total Revenue	\$22,781,741	\$25,035,191	\$26,037,870	\$28,709,567
Expenditures (1)				
11 Instruction	\$13,615,443	\$12,915,101	\$12,560,710	\$13,755,917
12 Instructional Resources and Media Services	\$375,440	\$271,724	\$223,614	\$261,327
13 Curriculum and Staff Development	\$155,177	\$187,367	\$226,698	\$233,539
21 Instructional Leadership	\$427,088	\$415,446	\$319,985	\$244,792
23 School Leadership	\$1,723,527	\$1,819,501	\$1,747,710	\$1,802,438
31 Guidance and Counseling Services	\$1,037,722	\$971,613	\$854,490	\$957,969
32 Social Work Services	\$0	\$0	\$0	\$15,853
33 Health Services	\$298,800	\$291,970	\$292,977	\$358,675
34 Transportation	\$897,120	\$861,200	\$763,957	\$995,442
35 Food Services (2)	\$0	\$0	\$1,296	\$0
36 Extracurricular	\$1,029,284	\$1,063,796	\$1,009,154	\$933,405
41 General Administration	\$1,165,879	\$1,202,832	\$1,262,051	\$1,438,691
51 Facilities Maintenance and Operations	\$2,974,568	\$3,044,971	\$2,942,396	\$3,132,155
52 Security and Monitoring	\$222,290	\$212,661	\$206,631	\$222,654
53 Data Processing Services	\$464,905	\$545,459	\$532,897	\$642,265
61 Community Services	\$13,576	\$23,403	\$19,065	\$1,500
72 Debt Service	\$501,181	\$465,504	\$511,772	\$798,600
81 Capital Outlay	\$1,397,410	\$500,553	\$1,419,172	\$366,536
Total Expenditures	\$26,428,892	\$24,866,899	\$24,894,575	\$26,161,758

Notes:

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2016–17 to 2019–20.

⁽¹⁾ Category numbers are the numerations used by the Texas Education Agency to classify expenditures.

⁽²⁾ The function code for Food Services represents the money spent from the district's general fund on activities whose purpose is managing the food services program of the school or school system and serving regular and incidental meals, lunches, or snacks in connection with school activities. Food Services operations maintain their own fund, and this expenditure amount will remain zero unless the district's food services fund operates at a loss for the school year and the district has to cover food service losses from the general fund.

categories for each of these years were: instruction; and facilities maintenance and operations. School leadership, capital outlay, and general administration also were significant expenditure categories during these years.

The Legislative Budget Board's School Performance Review Team selected three school districts, Castleberry ISD, Calhoun County ISD, and Tuloso-Midway ISD, as peer districts for Gonzales ISD. Peer districts are districts similar in size and other characteristics to Gonzales ISD that are used for comparison purposes. **Figure 3–4** shows Gonzales ISD's tax rate compared to the peer districts. The tax rate, set by the local district pursuant to the taxation laws of the state, drives local revenue. Gonzales ISD had a lower tax rate than all peer districts for school years 2015–16 to 2017–18.

School districts in Texas receive two financial accountability ratings — the School Financial Integrity Rating System of Texas (FIRST) and Smart Score. FIRST is Texas' school financial accountability rating system intended to hold public schools accountable for the quality and improvement of their financial management practices. Its goal is to encourage Texas school districts to provide the maximum allocation possible for direct instructional purposes. The Smart Score rating measures academic progress and spending at Texas' school districts and campuses. The Smart Score ratings range from one to five, with five being the best, indicating a district's success in combining cost-effective spending with the achievement of measurable student academic progress. Smart Score lists academic and spending ratings as low, average, or high. The district and campus Smart Score calculations use three-year averages to calculate more stable and consistent measures with less year-to-year volatility. The 2017 Smart Score rating results use data from school years 2013-14 to 2016-17.

FIGURE 3–4
GONZALES ISD TAX RATE COMPARED TO PEER DISTRICTS
SCHOOL YEARS 2015–16 TO 2017–18

DISTRICT	2015-16	2016-17	201 <i>7</i> –18
Gonzales ISD	1.1633	1.1800	1.1600
Calhoun County ISD	1.2936	1.2936	1.2936
Castleberry ISD	1.4155	1.3766	1.3922
Tuloso-Midway ISD	1.3774	1.4089	1.3722

Source: Texas Education Agency, Public Education Information Management System Financial Data, school years 2015–16 to 2017–18.

Figure 3–5 shows Gonzales ISD's FIRST and Smart Score ratings compared to peer districts. Gonzales ISD and two of its three peer districts scored a FIRST rating of A/Superior for school year 2018–19. Not shown in the figure, Gonzales ISD scored A/Superior for school year 2017–18 and a B/Above Standard for school year 2016–17. Gonzales ISD's 2019 Smart Score was 2.0, with an academic performance rating of very low academic progress and a spending rating of average. Gonzales ISD's 2019 Smart Score rating is lower than two of its three peer districts.

The CFO prepares a cash flow forecast to estimate the district's expenditures every six months. The CFO bases the cash flow forecast on the previous year's revenue, the number of students in the budget projections during the district's annual budget development process, and the projected average student attendance rate. More specifically, the district uses historical monthly tax collections to anticipate what percentage of current year taxes will be received each month. The district also uses the revenue projections from the summary of finances and current year projected tax collections to forecast cash flow.

FIGURE 3-5
GONZALES ISD'S FINANCIAL INTEGRITY RATING SYSTEM OF TEXAS AND SMART SCORE RATINGS COMPARED TO PEER DISTRICTS, SCHOOL YEAR 2018-19

DISTRICT	FIRST RATING (1)	SMART SCORE (2)	SMART SCORE ACADEMIC PERFORMANCE RATING	SMART SCORE SPENDING RATING
Gonzales ISD	A=Superior	2	Very low academic progress	Average spending
Castleberry ISD	A=Superior	4	Average academic progress	Very low spending
Calhoun County ISD	A=Superior	4	Average academic progress	Very low spending
Tuloso-Midway ISD	C=Meets Standard	2	Average academic progress	Very high spending

Notes:

- (1) School year 2018–19 data are the most recent data available for the Financial Integrity Rating System of Texas (FIRST) ratings as of
- (2) Calendar year 2019 Smart Scores are based on school year 2017–18 data.

SOURCES: Texas Education Agency, Financial Integrity Rating System of Texas; Texans for Positive Economic Policy, 2019 Smart Scores.

FIGURE 3–6
GONZALES ISD'S PURCHASING RESPONSIBILITIES, SCHOOL YEAR 2019–20

POSITION	RESPONSIBILITIES
Chief Financial Officer (CFO)	Performs oversight of overall purchasing process.
Business Manager	Receives and reviews competitive bids from campus-based contacts; last reviewer for requisitions before transition to purchase order.
Administrative Assistant to the CFO	Checks account and commodity codes to ensure proper usage by campuses and departments. Checks and processes requisitions for campuses. Receives and reviews competitive bids from campus-based contacts.
Accounts Payable Specialist	Conducts weekly check processing, processes all vouchers, and generates all checks.
Sources: Legislative Budget Bo	oard School Performance Review Team; Gonzales ISD, March 2020.

The CFO oversees Gonzales ISD's asset and risk management activities. The district invests its funds in state investment pools and a local bank with an account that offers no fees and a competitive rate of return. The CFO transfers funds between accounts at the depository bank as needed to cover payroll and accounts payable checks.

Board Policy CH (LOCAL) authorizes the superintendent to make purchases of less than \$75,000 without board approval. The superintendent has delegated the CFO or business manager to approve all such purchases. Gonzales ISD does not have a full-time position dedicated to purchasing due to the district's small size and budgetary limitations. Finance Department staff conduct purchasing tasks related to oversight of the procurement process, curating the vendor list, and processing purchase orders, payments, and invoices.

Figure 3–6 shows Gonzales ISD's current distribution of purchasing responsibilities.

Gonzales ISD has developed and implemented a financial procedures manual, which includes a purchasing procedures. The district provides this manual to all campus and department staff. The purchasing manual is comprehensive, and it includes documentation of every form, step, and approval required for a valid purchase order.

The district uses the financial management software Skyward for its financial operations. The district uses this software's online requisition system for all purchases based on requestors submitting a purchase order. The electronic system enables users to enter purchase requests electronically, verify account balances, and select pre-approved vendors at the point of data entry.

The district has a warehouse that is used primarily to store paper and as a central receiving location for some district purchases. For most purchases, the district has a just-in-time delivery process, and purchased items are stored at the campuses or departments in which the purchases originated. Just-in-time delivery involves ordering and receiving inventory for production or sales only as needed, reducing warehousing costs because inventory is constantly on the move.

Gonzales ISD's external auditor issued unqualified opinions during the last five years' financial audits. In other words, the auditor found no instances of noncompliance and made no comments involving internal controls or other material weaknesses in the district's financial management.

DETAILED FINDINGS

CAMPUS BUDGET DEVELOPMENT (REC. 13)

Gonzales ISD's campus budgeting process is not aligned to district improvement or campus improvement plans.

A school district's budget is the vehicle for allocating financial resources to meet student needs; as such, its budget serves as a financial representation of its goals and priorities and demonstrates a level of efficiency.

The Gonzales ISD campus budget process begins every year after winter break. At this time, the district prepares a preliminary budget for each campus for the following school year using two separate formulas that establish personnel and nonpersonnel funding amounts. These two amounts are combined to make up total campus funding. The CFO uses a formula developed by the Texas Association of School Business Officials (TASBO) to determine a planning amount of nonpersonnel funding available for each campus for the following school year. The chief human resources officer (CHRO) determines personnel funding for each campus through a separate formula based on a TASBO salary study. After both formulas are complete, the CFO, CHRO, and superintendent examine campus budgets and then communicate these amounts to each campus principal.

Next, the principals and their campus improvement committees (CIC) review the budget and determine how the money would be spent. An estimated 80.0 percent to 85.0 percent of campus budgets are allocated for personnel costs, with the remainder for operations costs such as materials, programs, and equipment. Campuses can request additional funds if necessary. Principals submit campus budget allotments and requests for additional funds electronically to the Finance Department. After reviewing and approving the campus budgets, the CFO submits the campus and department budgets as a district budget for board approval. The board reviews and approves the district budget before August 31 each year.

Separate from the district's budget process, Gonzales ISD also develops district and campus improvement plans beginning each spring. The Texas Education Code, Section 11.251, requires districts to annually develop a district improvement plan (DIP) approved by the board. The DIP's purpose is to guide district and campus staff to improve student performance by developing annual goals, objectives, and strategies based on analysis of student achievement, graduation rates, retention rates, and other federal and state accountability indicators. The DIP is developed annually by the district education improvement committee (DEIC), which consists of campus-level professional staff, district-level professional staff, parents, and community representatives.

Each campus also must develop a campus improvement plan (CIP) each year as required by the Texas Education Code, Section 11.253. The CIP is a one-year plan that sets the campus's educational objectives. Similar to the DIP, a CIP sets measurable goals, objectives, and strategies for each individual campus. CIPs are developed by CICs that include administrators, department staff, teachers, and community representatives. The board approves the DIP and CIPs before implementation.

The district's budget manual outlines the budget process and states the following guidelines:

- "• Each campus budget manager should ensure that the campus plan and the campus proposed budget are "linked"; for example, all strategies listed on the campus plan should be included in the proposed budget if a cost for staff, supplies, travel, etc., will be incurred;
- · The District Improvement Plan and goals should be reviewed;

- The district's mission statement and goals should be the foundation to budget planning, preparation, and evaluations; and
- Note: Your CIP should drive 100 percent of your budget requests (including staffing)."

However, during the review team's onsite visit in March 2020, staff reported that the development processes for the district's budget and the DIP and CIPs are independent activities. Gonzales ISD's improvement plans are not integrated into budgeting. The campus funding established during the district's budget development process is not connected to the goals included in the DIP or CIPs. Additionally, the board often adopts the budget before the improvement plans have been developed completely. Making budgetary decisions that are not driven by the student performance goals outlined in the DIP and CIPs could lead to inefficient and ineffective spending. Additionally, the failure to align resource allocation with improvement planning limits the improvement strategies that can be implemented.

San Felipe Del Rio Consolidated ISD established a budget preparation process that requires that campuses use the goals and objectives outlined in their CIPs to drive the campus budgeting process. Similarly, Huntsville ISD's budget preparation manual states, "Campus budgets should evolve from identification of the school's goals and objectives as documented in the Campus Improvement Plan (CIP). Also essential to the continuous cycle is the evaluation process, which examines how the funds were expended, what outcomes resulted from the expenditure of funds, and to what degree these outcomes achieved the objectives stated in the CIP."

Gonzales ISD should expand on the existing budget development process and ensure that it is aligned to the district and campus improvement plans.

The superintendent, in collaboration with the CFO, should set a budget calendar for the district that coincides with the development of the DIP and CIP. The superintendent should ensure that both the district's budget and improvement plans are developed and reviewed by the same individuals, including the CFO, campus administrators, and the DEIC and CICs. The CFO should develop and implement a formal process that requires that district and campus budgets mirror the goals and objectives of the DIP and CIP. As the campus administrator and CIC review the campus budget, they should demonstrate how the goals and objectives of the CIP are integrated into the budget. The DEIC should follow the same procedure for the district budget. The CFO should include in the budget any goals and objectives in the DIP or CIPs that state a cost. Additionally, as the board reviews and approves the district budget, it should be able to confirm that the costs of the programs to meet the goals and objectives included in the DIP and CIPs are represented in the district budget.

The district could implement this recommendation with existing resources.

DEPARTMENTAL BUDGETING (REC. 14)

Gonzales ISD's process for developing and monitoring departmental budgets is inefficient.

Each January, the district prepares a preliminary budget for its departments. During onsite interviews, staff said that department budgets are based on the funding amount the department received the previous year, less any onetime expenditures. This type of budgeting is called incremental budgeting and it is the most common method of budgeting because it is simple and easy to understand.

The CFO sends these budgets to the department supervisors to review, and they provide feedback if they feel the funding is insufficient. However, department supervisors said that with a few exceptions the amount in the preliminary budget is the amount they will receive. Overall, department supervisors did not express any major concerns or frustrations with the budget process.

Incremental budgeting is appropriate to use if the primary cost drivers do not change from year to year; however, the exclusive use of this method may perpetuate inefficiencies in district operations. For example, if department supervisors know that their departments will receive the same amount of funding every year, they may be discouraged from seeking to reduce costs or economize. Staff acknowledged that the district relies on supervisors to tell the CFO if their departments are receiving excess funding.

Another issue with using incremental budgeting exclusively is that it may exclude external drivers of activity and performance. Incremental budgeting does not consider external factors and assumes that the budget for the department will remain the same every year. This assumption could result in disconnection of the department's budget from its actual needs. For example, annual changes in student enrollment would affect the amount of supplies and staff a district needs to manage its

custodial services effectively. If the custodial budget remains the same every year regardless of student enrollment shifts, the district's Operations Department may not be able to adapt cost-effectively to such changes.

Another area of inefficiency within Gonzales ISD's departmental budgeting process is that departments do not monitor differences between budgeted and actual spending consistently. Effective departments review budgeted-to-actual amounts at least monthly, depending on the frequency of spending, to evaluate their performance, forecast future revenue, and identify any operational centers that are performing differently than expected.

Data comparing budgeted to actual spending amounts are available to all department supervisors through the district's financial management software program. The district's budget manual states that directors should review their budgets at least quarterly. However, during onsite interviews, staff reported that the frequency of monitoring budget to actual amounts varies by department. For example, one director arranged for the department to receive a budgeted-to-actual spending report daily via email. However, other directors check these amounts only when department secretaries alert them that funding is low. Staff said that directors receive no specific direction on how regularly to review spending.

Although no evidence shows excessive budget transfers or financial mismanagement in Gonzales ISD's departmental spending, a lack of monitoring of budgeted-to-actual spending may result in a department being more susceptible to poor financial decision making. For example, a department director that does not monitor budgeted-to-actual spending could overspend at the beginning of a fiscal year when more funds are available in the department budget. This excessive spending could cause a large variance from expected financial performance, making it difficult for that director to have the budget for necessary expenditures later in the year. Regular monitoring of budgeted-to-actual amounts throughout the year, rather than just at pressure points at the end of the fiscal year, could result in greater transparency of performance and more judicious purchasing.

Many successful districts implement zero-based budgeting, which requires the justification and approval of all expenses for each new period. Zero-based budgeting starts from a zero base at the beginning of each budget period. This method requires budget writers to analyze the needs and costs of every function within the organization and to allocate funds accordingly,

regardless of the level of funding previously provided to any expense category. The School Superintendents Association's 2019 report *Budgeting Based on Results* states the following advantages of zero-based budgeting for school districts:

- it requires predicted outcomes to be established and empirical means of assessing effectiveness;
- it provides a returns method for determining budget priorities;
- it provides the information necessary for deciding whether to maintain, build, or eliminate programs, or introduce new programs;
- it ultimately leads to a more strategic simplification of effort while increasing student and program success; and
- it requires those involved in the budget development to evaluate whether such programs and activities are fortifying student achievement.

Gonzales ISD should implement zero-based budgeting for departments and establish budget-monitoring guidelines for department supervisors.

The CFO should pilot zero-based budgeting with all departments starting in January 2021 to establish departmental budgets for school year 2021-22. The CFO should determine if they need assistance from the business manager or other Finance Department staff in implementing this budget process. If needed, the CFO could attend zerobased budgeting trainings from TASBO or request support from Regional Education Service Center (ESC) XIII (Region 13). After one year, the CFO should discuss the zero-based budgeting process with the superintendent and department supervisors. The CFO and superintendent should determine whether the district should continue to implement zerobased budgeting for departments every year or to conduct zero-based budgeting only every three to five years. The district could decide to use incremental budgeting during those years it decides not to perform zero-based budgeting.

Additionally, the CFO should modify the procedures outlined in the budget manual to require all department supervisors to monitor budgeted-to-actual spending amounts weekly. Department supervisors should be trained annually on using the district's financial management software to access these amounts. The district could provide standardized reporting through an email generated from its financial management software to department supervisors weekly to

notify them of current budgeted-to-actual amounts. The CFO also should meet quarterly with department supervisors to ensure active tracking of figures.

The district could implement this recommendation with existing resources.

LONG-TERM FINANCIAL PLANNING (REC. 15)

Gonzales ISD lacks a long-term financial planning process.

The district's financial planning consists of two resources. The first is the annual budget that estimates the revenue and expenditures required to fund Gonzales ISD's campuses and departments for the next fiscal year. During onsite interviews, staff and board members expressed satisfaction with the district's budget development process; however, they also acknowledged that Gonzales ISD does not engage in formal long-term financial planning.

The district's budget is developed through a collaborative process among the CFO, campus administrators, and department heads. The formulas the district uses to determine the budget include enrollment and economic projections, but they are focused on projections for the upcoming year and rely on prior-year expenditures to project the following year's expenses. Using the annual budget as the only resource for financial planning does not connect spending with long-term district priorities effectively. Additionally, the full, multiyear, detailed cost of initiatives often is not known or considered as part of the budgeting process.

The second resource the district uses for financial planning is a spreadsheet, developed by the CFO, of long-term economic projections for the district. The superintendent and two board members reviewed the spreadsheet. However, this document has not been reviewed by campus administrators, department heads, or the entire board. At the time of the onsite visit, the spreadsheet was not used to inform the district's budgetary decisions. Since the time of the review, information was incorporated into the board's August 2020 budget presentation to reflect data from this spreadsheet.

A long-term financial planning process involves developing a multiyear financial plan through the following actions:

- reviewing the internal and external factors that result in revenue and expense changes during subsequent budget years;
- projecting revenues and expenditures for a five-year to 10-year period;

- projecting how budget additions in one year will affect subsequent years; and
- providing realistic financial budget information to continue current district programs and services.
- A multiyear financial plan does not authorize expenditures, but uses economic projections to forecast the district's future ability to pay for and provide services. These projections assess revenue trends, expenditure commitments, financial risks, and the affordability of additional services and capital investments.

Many districts cannot make large changes to their educational strategy and resource allocation patterns within a single fiscal year. Thus, districts utilizing best practices develop and adhere to a multiyear funding plan for their strategies, with the goal of fully funding and realigning resources where necessary to fund high-priority elements of the strategies.

The lack of a long-term financial planning process may expose the district to the dangers of macro-level variability without proper planning to anticipate potential changes. For example, the price of oil has dropped substantially during recent months, and could alter the economic outlook of the region significantly and possibly affect student enrollment. These macroeconomic changes can have a large effect on the drivers of demand, resulting in long-range budgetary changes that Gonzales ISD must work to anticipate and address. Without a long-term financial plan serving as an overarching framework, annual budgets cannot be integrated into a program to address long-term issues, such as the need to adapt the curriculum to a changing student body and to external changes for which public education must prepare its students. Furthermore, long-term planning enables the consistent and stable provision of educational programs and prevents the initiation of projects or programs that would have to be abandoned later because of the district's inability to finance them. It also promotes financial management rigor by helping the board and district leadership to see the longterm effects of decisions and is particularly effective at discouraging unsustainable practices, such as using debt or fund balances to finance operating expenditures.

The Government Finance Officers Association (GFOA) is an association of public finance officials throughout the United States and Canada. Its 2007 report, *Making the Grade: Long-term Financial Planning for Schools* lists the following phases of long-term financial planning:

- Mobilization This phase serves to prepare the school district to financially plan. It includes district leadership and staff establishing a shared set of educational objectives for the plan and defining a clear planning process and the roles stakeholders will play in it. The final piece of the mobilization phase is to identify financial policies. Financial policies describe the standards for financial stewardship to which the district will hold itself. The policies may include the fund balance level to be maintained, the permissible levels and uses of debt, cost-recovery goals for fee-based programs, and the proper role of grants in funding school activities;
- Analysis This phase generates the information needed to identify potential future financial imbalances and to support development of strategies for financial sustainability through the following five main activities:
 - fiscal environmental analysis provides knowledge and awareness of the district's financial environment in general, as well as of special issues confronting the district through examining future enrollment trends, staffing considerations, curriculum developments, land use trends, fund balances, and school competition;
 - revenue forecasts describes the estimated amount of resources that will be available to fund programs in pursuit of the district's desired level of educational service;
 - expenditure forecasts describes the amount of resources school districts can expect to spend in pursuit of the district's desired level of educational service;
 - debt analysis evaluates both the district's current debt obligations and its capacity to issue new debt with respect to future facility needs and state statutes that establish ceilings for debt issuance; and
 - financial balance analysis incorporates the results of the environmental analysis, revenue and expenditure projections, and debt analysis to identify potential imbalances in the district's future financial position;
- Decision Phase In this phase, the district develops strategies to achieve and maintain fiscal balance in

light of any potential future imbalances uncovered during the analysis phase; and

 Execution Phase – In this phase, the district implements the strategies generated through the plan. The budget document is the main vehicle for implementing financial strategies. The connection between the budget process and long-term planning is structured to guide the district's fiscal decisions.

Gonzales ISD should develop and implement a long-term financial plan.

The CFO and superintendent should form a financial planning committee that includes selected teachers, department supervisors, campus administrators, and Finance Department staff. First, the committee should establish a scope for the plan, which should extend from five years to 10 years. Next, the committee should establish future financial goals for the district within the expected period. These goals should be specific to the needs of the district and set a framework for its future activities. The financial goals should be related to the district's long-term academic or strategic goals. The superintendent should present the goals of the committee to the board for approval.

Next, the plan should establish a district financial forecasting process. The goal of this process is to project district revenues and expenditures during a long-term period, using assumptions about economic conditions, future spending scenarios, and other salient variables. The district should conduct a five-year forecast in accordance with the elements discussed by the GFOA in the analysis phase of its report. This includes conducting a fiscal environmental analysis, revenue projections, expenditure projections, debt analysis, and a financial balance analysis.

The district should determine whether it has the appropriate information to conduct effective forecasting or if it should hire an outside consultant to assist.

After the forecasting is complete, the committee should use the data to establish strategies for achieving and maintaining financial balance that connect to the plan's financial goals. The district should view the budget as the main vehicle for implementing its long-term financial strategies. The connection between the budget process and long-term planning should be deliberate and could utilize one of the following methods:

• the budget can be used to implement specific financial strategies by identifying an allocation of resources in

the budget and describing achievement of the strategy as an explicit goal for the upcoming budget cycle; for example, if the district intends to raise a reserve to a certain level, the amount of funds necessary to set aside to reach that level is shown in the budget;

- the long-term financial planning process will identify
 a multiyear strategy for implementing the district's
 broader goals for providing the best education value;
 the budget could be used to allocate resources to the
 appropriate annual activities to achieve that strategy;
- the long-term financial plan may identify assumed limitations on expenditure growth that are consistent with the district's projected long-term resource availability. The budget must then be developed and managed within the parameters established by these assumptions. For example, perhaps the financial plan states that personnel costs cannot increase by more than 3.0 percent per year to maintain financial balance. Budgets would then be developed and controlled within that guideline; and
- long-term planning can be used to better identify
 the resources that will be available for capital
 expenditures, such as through its debt analysis; the
 results of these deliberations should be reflected in the
 district's capital improvement plan and budget.

The committee also should develop mechanisms to monitor the strategies' success, such as a scorecard of key indicators of financial health. Key indicators provide information regarding performance and should measure progress toward the district's broader educational goals as articulated in the mobilization phase and the financial strategies developed in the decision phase. These indicators also provide a convenient basis for ongoing monitoring of the plan's implementation.

The committee should present the completed plan as a report to the board for approval. The report will include the goals, forecasting data, and strategies. When it is approved, the plan should be made available publicly on the district's website. The committee should meet regularly to review the plan and determine how often the district should repeat the financial planning process.

Since the time of the review, the district contracted with Region 13 for a districtwide strategic planning process. The district also contracted with the Texas Association of School Boards (TASB) for a facilities assessment and long-range facilities plan. The district has completed a review of the

Technology Department through a partnership with TASBO for implementation of a comprehensive technology improvement plan. District staff stated that all of these agreements will assist with long-term planning and are the foundation for a more thorough and comprehensive long-term financial plan.

No fiscal impact is assumed for this recommendation. The district should perform an analysis to determine if it is more cost effective to hire an outside consultant to assist with the long-term financial planning process or to implement the process with existing resources.

ASSET MANAGEMENT (REC. 16)

Gonzales ISD does not manage and track district assets effectively.

Gonzales ISD maintains two types of fixed assets—capital assets and controlled assets. Capital assets are large purchases that are capitalized and depreciated. Board Policy CFB (LOCAL) defines capital assets as assets costing more than \$5,000. These assets often include building improvements, equipment, and vehicles. Controlled assets are those valued at less than the depreciation threshold. In Gonzales ISD, controlled assets are those valued from \$500 to \$5,000. TEA's FASRG defines controlled assets as "personal property that is durable but does not meet the district's criteria for capitalization as a capital asset. These items have a useful life longer than one year." Examples of controlled assets may include computers, audiovisual equipment, textbooks, desks, and physical education equipment. Board Policy CFB (LEGAL) requires that the district maintains inventories of its assets as recommended and directed by FASRG for reporting and insurance purposes.

The Gonzales ISD Fixed Asset Procedures Manual, written and maintained by the Finance Department, details the district's fixed asset management processes. The manual states that the district will maintain an up-to-date inventory of all equipment, vehicles, and buildings with a unit value greater than \$5,000 for audit purposes. It also states that "inventory of other small equipment may be tracked by the respective campus or department." The manual also discusses that, annually, a list of all inventory and fixed asset items will be sent to each campus and department for reconciliation purposes. Campus administrators are responsible for having teachers or staff at that campus sign for the property they are accountable for each year. Approximately every two years, the Finance Department hires an outside source to inventory the district's fixed assets. When the inventory list has been

updated by the outside source, a copy may be sent to all campus administrators."

Gonzales ISD's asset management tools are underdeveloped and consist of multiple disparate manual and automated systems. The Finance Department uses the Skyward software package for its daily business functions. This software system contains a module to maintain accurate accounting of the district's capital and controlled assets. The module could assist with maintaining all schedules, calculations, and distribution codes, including historical depreciation. Depreciation of capital assets is the method used to account for the reduction in the value of an asset and to allocate that loss during the useful life of the asset. Assets typically are written off when fully depreciated and disposed. The software system can retrieve items from the district's financial database automatically, mass update inventory records, check inventory in and out, require an audit trail, and forecast replacement needs through asset management reports. The software also can handle the annual depreciation schedule and book capital assets in the system. However, Gonzales ISD staff said that they are not using these features, and their use would require an additional fee.

During onsite interviews, staff said that the district typically tracks only capital assets. These assets are recorded in a spreadsheet at the time of purchase and only some are tracked subsequently. The Finance Department maintains this spreadsheet, and campus principals or department supervisors typically do not access it.

Gonzales ISD also lacks a process to tag, track, and inventory its fixed assets. When the district receives a capital asset, the CFO notes it in the spreadsheet, and the district's external auditor later records the asset into the district's capital asset listing during the audit process. The district does not tag capital assets; however, the CFO notes the general location of the asset in the spreadsheet. In addition, the capital asset inventory maintained by the Finance Department does not include technology-related fixed assets. Technology assets are tracked through a barcode-based tracking system that populates all technology assets into an asset database with frequent updates. This technology asset database is maintained by the Technology Department and is separate from the database maintained by the Finance Department. Neither the CFO nor the business manager have direct access to the technology database.

Gonzales ISD also does not conduct an annual physical inventory of its capital assets; however, the district contracts

with an external organization to conduct a physical inventory of capital assets every two years.

The district does not effectively maintain an inventory of controlled assets. Gonzales ISD does not have a process to ensure that departments and campuses consistently track or monitor these items. Campuses and departments follow purchasing procedures to order district assets. When a campus or department receives an asset, staff do not affix an inventory tag to the asset or track its location. Campuses and departments also do not consistently track assets electronically. Operations Department staff reported that vehicles are tracked, but many other assets including tools, cleaning equipment, furniture, athletic equipment, food preparation and processing items, and other items are not tracked centrally. Thus, the district has no system to verify the working order of these items or to assess remaining useful life to inform purchasing decisions. The director of operations delegates authority to track these items to the appropriate department's staff without a specific process in place. For example, the supervisors of cleaning crews know that they have multiple pieces of equipment, but the equipment is not recorded anywhere easily accessible to the director of operations or Finance Department staff. The district also has no process for regular check-in meetings between the director of operations and staff regarding these items except in exceptional circumstances, possibly involving theft or loss. No evidence shows that campuses or departments are conducting any physical inventories of controlled assets consistently.

The district's ability to record relevant information, prevent loss, and estimate value is limited because it records fixed assets in separate spreadsheets that track a small number of larger and high-value items. Without taking physical inventories of the district's fixed assets, Gonzales ISD cannot ensure that all its assets can be located and accounted for. The district cannot always accurately determine if or when items are lost or stolen. In the event of theft or waste, without proper documentation of inventory, the district is unaware of which staff are responsible and when and where the loss occurred. This lack of documentation may present additional risks if the district lacks the information required to file an insurance claim for a missing or stolen asset. Furthermore, the lack of a tagging and tracking system prevents Gonzales ISD from easily accounting for fixed assets. Consequently, information reported on district financial statements could inaccurately reflect the value of fixed assets in the district.

The Texas Comptroller of Public Accounts (CPA) developed a fixed asset best practices process to assist districts in developing an effective and efficient fixed assets management system. These best practices represent a comprehensive solution to deficient fixed assets management systems and suggest steps to develop and maintain an effective system. **Figure 3–7** shows the fixed asset inventory best practice steps outlined by the CPA.

TASBO provides training in all areas of fixed asset management best practice. The association offers a training workshop, "Accounting for Fixed Assets," which addresses the types of fixed assets and how to record each type properly. Additionally, the workshop discusses other topics such as capitalization, valuation, and depreciation.

Gonzales ISD should develop and implement a comprehensive management system to identify, record, inventory, and track district assets.

The inventory process for Gonzales ISD should include an efficient and effective tagging and tracking system that will identify, record, track, and assist in proper disposal of fixed assets. District staff should then manually affix tags to the assets and record the location of each. Designated staff should then enter these assets into the financial management software using the software's asset management module, which offers integrated tracking that all relevant stakeholders can access and utilize. This would enable the CFO, campus principals, and department supervisors to more transparently oversee district assets. Gonzales ISD should contact other districts served by Region 13 that are using this module for advice, information, and counsel.

Gonzales ISD should expand its Fixed Asset Procedures Manual to develop more detailed written procedures that outline the district's fixed asset inventory process. The procedures should include:

- definitions and examples of controllable assets to track;
- methods for identifying controllable and capital assets, such as bar coding;
- staff responsibilities and accountability for assets;
- · using one software system for asset record keeping;
- frequency of physical inventories, such as annual or semiannual, including procedures for transferring assets from one location to another; and

FIGURE 3–7 TEXAS COMPTROLLER OF PUBLIC ACCOUNTS BEST PRACTICES FOR FIXED ASSET INVENTORY FISCAL YEAR 1999

Preliminary Steps

- identify individuals in the district who will have key fixed asset responsibilities and establish the nature of such responsibilities;
- devise policies and procedures governing capitalization thresholds, inventory, accounting, staff accountability, transfers, disposals, surplus and obsolescence, and asset sale and disposition;
- · determine district fixed asset information needs and constraints; and
- determine the hardware and software necessary to effectively manage the system

Establishing the Fixed Asset Management System

- adopt a proposal setting up the fixed asset system including adoption of formal policies and procedures;
- develop positions and job descriptions for those with fixed asset responsibilities;
- determine the design of the fixed asset inventory database and develop standard forms to match the format of computerized records:
- provide training as necessary;
- identify specific fixed assets at less than the capitalization threshold that should be tracked for information purposes and safeguarding; and
- budget the amount necessary to operate the fixed assets management system adequately

Implementing the Fixed Asset Management System

- inform all departments of the requirements, policies, and procedures of the fixed assets system;
- ensure that assets to be tracked on the system have been identified and tagged;
- enter information into the fixed assets database;
- · assign appropriate values to the assets in the database; and
- establish location codes and custodial responsibility for fixed assets

Maintaining the Fixed Asset Management System

- enter all inventory information into the automated fixed asset system as fixed assets are received;
- assign tag numbers, location codes, and responsibility to assets as the district receives them;
- · monitor the movement of all fixed assets using appropriate forms approved by designated district personnel;
- conduct periodic inventories and determine the condition of all assets;
- generate appropriate reports noting any change in status of assets including changes in condition, location, and deletions;
- reconcile the physical inventory to the accounting records, account for discrepancies, and adjust inventory records; and
- use information from the system to support insurance coverage, budget requests, and asset replacements

Source: Texas Comptroller of Public Accounts, Getting a Fix on Fixed Assets, 1999.

 procedures to follow when assets cannot be located, including responsibilities for making reports to police and the district's insurance carrier, as appropriate.

The CFO should participate in online asset management training regularly offered by TASBO. The CFO is a member of TASBO, and, therefore, the training is available at no additional cost to the district. The principals and other Finance Department staff also should attend TASBO trainings.

No fiscal impact is assumed for this recommendation. The district should compare the cost of using Skyward's asset management module to the cost of other asset management software programs. A fiscal impact cannot be estimated until

the district determines which asset management software it will use.

VENDOR DATABASE (REC. 17)

Gonzales ISD lacks an effective process to manage its master vendor list.

The district maintains a master vendor list of 151 vendors that includes information about each, such as vendor identification number, name, address, and whether the vendor participates in the U.S. Communities and BuyBoard cooperatives. U.S. Communities is a cooperative purchasing organization that assists public agencies in reducing the cost of purchased goods through pooling the purchasing power of public agencies. BuyBoard is a

national online purchasing cooperative intended to streamline the buying process for school districts, municipalities, and other public entities. BuyBoard was formed by the National School Boards Association and several state school boards associations, and it is administered by TASB.

The district has not assigned staff with dedicated responsibility for the purchasing function of the district, which is split among various Finance Department staff. The CFO manages the master vendor list with assistance from the business manager. The CFO makes the final decision on adding vendors to the vendor master list. During onsite interviews, Finance Department staff said that vendors rarely are removed from the vendor master list, and the district does not maintain a formal process for deciding whether a vendor should be removed. Staff could recall the district removing two vendors during the past few years due to poor service, and not through a formal evaluation.

The district delegates many choices regarding vendors to individual departments and campuses to enable their discretion. Campus registrars and department secretaries often select the vendors. The district maintains a purchasing manual, and Finance Department staff train the campus registrar and department secretary positions annually on the district's purchasing process. Campus and department staff receive access to the master file of approved vendors and a list of preferred vendors. The Finance Department staff generates the preferred vendors list, and includes vendors that the district commonly uses and staff has determined to offer good quality at the lowest prices. The composition of the list is not based on relationships with the vendors, nor is there a regular schedule for updating the preferred vendor list. Staff said the preferred vendor list is updated irregularly, and they could not confirm the last time it had been updated. When selecting a vendor, staff are required to submit at least two other quotes from vendors for the same item to demonstrate that they are not overspending.

Campus and department staff said that they often buy from the large retailers on the preferred vendor list due to the simplicity of using these vendors. These large vendors' invoicing systems are streamlined and compatible with the district's purchasing software system. These vendors may be the best option, but the district risks that the simplicity of purchasing through large retailers might lead staff to select them instead of other vendors that offer better prices but have cumbersome processes.

Additionally, Gonzales ISD does not have an active process to review the vendor master list regularly to purge inactive vendors or to survey staff regarding experience with vendors. The existence of inactive vendor records could result in an opportunity for dishonest staff to divert district funds.

The Finance Department performs limited management of the vendor list, which could limit opportunities to achieve savings on certain items through active vendor outreach and more regularly updating preferred vendor lists that are provided to staff.

Effective districts conduct periodic reviews of their vendor lists to identify inactive vendors and deactivate or remove them from the database. In its 2010 white paper *Solving the Vendor Master File Conundrum*, APEX Analytix, a multinational firm specializing in audit recovery services, outlined the benefits of purging vendor databases to avoid having too many unused vendors. Such benefits include reduction of costly duplicate payments, prevention and detection of fraud, and boosts in productivity. The report also outlined the following best practices for avoiding vendor database problems:

- establish clear standards for vendor setup and coding;
- establish a habit of checking whether the vendor has been entered before setting up a new vendor;
- establish fixed intervals for vendor database cleanup; and
- implement a vendor portal.

Gonzales ISD should review and update the district's vendor master list annually.

The district should consider APEX Analytix's best practice guidelines, and the CFO should develop protocols for reviewing and purging the vendor database. The administrative assistant to the CFO can be assigned to review the master vendor list regularly for inactive vendors and recommend them for purging.

The district also should establish a process for annually updating the preferred vendor list. Finance Department staff can complete this process each summer. This process should include researching commonly purchased items and reducing the number of vendors for specific items to guide campuses and departments to the best pricing options. The preferred vendor list should be developed using pricing

comparison among vendors, renegotiation of terms, and surveys of end-user experiences based on shipping times and reliability. Vendors should be added or removed from the list based on these factors, which will result in a smaller number of vendors that are known to deliver value consistently for Gonzales ISD.

The district could implement this recommendation with existing resources.

OPERATING PROCEDURES (REC. 18)

Gonzales ISD does not have documented procedures to guide the payroll function of the Finance Department.

Board Policy CB (LOCAL) mandates that "the superintendent shall develop and enforce financial management systems, internal control procedures, procurement procedures, and other administrative procedures as needed to provide reasonable assurance that the district is complying with requirements for state and federal grants and awards." However, the district does not have written procedures to guide all Finance Department functions. The Finance Department has developed and disseminated to all campuses and departments a financial procedures manual which includes accounts payable, accounting, and purchasing functions. However, the district lacks documented procedures to govern its payroll operations.

Payroll operations rely on oral communication and the knowledge of staff who have held their positions for several years. For example, as part of the district's payroll function, the payroll specialist must call the U.S. Internal Revenue Service twice a month to complete the district tax payments for the period. However, the district has no written procedures for this process, and new staff assuming the position might not understand how to conduct these payments. The lack of written procedures for the payroll function puts the district at risk because of the payroll specialist's scheduled departure in April 2020.

During onsite interviews, Finance Department staff acknowledged that the department lacks written procedures for the payroll specialist position and reported that they are developing procedures for this position. Without explicit procedures, the district risks noncompliance with board policies and that the Finance Department may be unable to continue providing adequate and timely payroll services. The district also risks inconsistencies in implementing policies if staff covering for absent colleagues do not know how to perform certain tasks.

Gonzales ISD should establish comprehensive written procedures for payroll duties.

The CFO, with assistance from the business manager, should develop a payroll procedures manual that details all payroll duties. The CFO should obtain feedback on a draft version from all Finance Department staff, and should disseminate the completed procedures manual to all Finance Department staff. The CFO should review and revise the procedures manual annually, or whenever significant changes occur.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations:

AUTOMATED VENDOR PAYMENTS

Gonzales ISD pays nearly all its vendors with checks instead of using automated clearinghouse (ACH) payments. ACH payments are electronic payments that withdraw funds directly from a payer's checking account. These payments differ from paper checks or initiating a debit card or credit card transaction because the funds transfer automatically. According to documentation submitted by Gonzales ISD before the onsite visit, two current vendors are set up to work with ACH. Issuing vendor payments via ACH could eliminate the administrative costs associated with mailing checks and monitoring checks for clearing.

UTILIZING FINANCIAL MANAGEMENT SYSTEM

Gonzales ISD's financial management system, Skyward, is underutilized. The district uses Skyward's School Management Suite for some functions, including procurement, payroll, and accounting functions. Finance Department staff expressed general satisfaction with the current features used by the district. However, the district may have further opportunities to automate processes by learning to use the system to its full potential. Staff separately mentioned that the ability to store records digitally, including invoices, would be valuable. Staff said that other areas in which unused modules in the district's financial management system could significantly improve efficiency and effectiveness within the Finance Department. Gonzales ISD should perform a comprehensive gap assessment that compares

current district needs with the capabilities of the financial management system.

COOPERATIVE PURCHASING

Gonzales ISD could increase its use of cooperatives for purchasing. The tasks related to oversight of the procurement process, curating the vendor list, and processing purchase orders, payments, and invoices are distributed among several Finance Department staff. Although staff manage the procurement process efficiently, the lack of dedicated staff for the procurement function inhibits growth and improvement in several areas. These areas include proactive identification of cooperative purchasing opportunities, direct engagement with vendors to secure lower prices, and proactive oversight of the procurement process to identify areas for improvement. The district could identify greater opportunities to cooperate on purchasing with neighboring districts, ESCs, and other relevant local or regional entities that could help Gonzales ISD achieve discounts through volume purchasing.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards or accepted best practices, and the district should review to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address the findings.

4. HUMAN RESOURCES MANAGEMENT

Gonzales Independent School District's (ISD) chief human resources officer (CHRO) conducts Human Resources Department tasks including recruitment, compensation, compliance, maintenance of personnel records, employee relations, and the district's hiring and separation processes. During school year 2018–19, Gonzales ISD employed 413.2 full-time-equivalent positions, including 182.1 teacher full-time-equivalent positions.

ACCOMPLISHMENT

♦ Gonzales ISD's Human Resources Department provides a clear, accessible pathway for human resources support.

FINDINGS

- Gonzales ISD does not perform data reporting, tracking, and analysis to support human resources management effectively.
- ♦ Gonzales ISD's hiring process is ineffective in recruiting qualified staff.
- ♦ Gonzales ISD lacks an effective process to review and update job descriptions regularly.
- Gonzales ISD does not ensure the proper storage of confidential staff files.
- ♦ Gonzales ISD's staff absenteeism exceeds the availability of qualified substitutes.

RECOMMENDATIONS

- ♦ Recommendation 19: Develop reporting metrics and tracking systems for performance evaluations, certifications, and all mandatory trainings.
- ♦ Recommendation 20: Develop a targeted recruitment and retention plan.
- ♦ Recommendation 21: Review and update all district job descriptions annually to align job titles with the responsibilities staff perform.
- ♦ Recommendation 22: Secure all staff files and confidential information in locking, fire-rated cabinets.

FIGURE 4–1
GONZALES ISD HUMAN RESOURCES DEPARTMENT
SCHOOL YEAR 2019–20



Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

♦ Recommendation 23: Conduct an analysis of substitute compensation and develop procedures and programs to increase staff attendance.

BACKGROUND

Human resource management includes compensation, recruitment, hiring and retention, records management, staff relations and grievances, and staff performance evaluations. These functions are defined by either compliance-based or strategic-based responsibilities. Compliance-based responsibilities include assuring that an organization is following federal, state, and local labor laws in areas such as benefits, compensation and hours worked, records management, mandatory leave, discrimination, medical privacy, safety, termination, and eligibility to work. Strategic-based responsibilities include recruiting and retention, compensation and benefits, and staff relations.

Figure 4–1 shows the organization of Gonzales ISD's Human Resources (HR) Department. The CHRO manages the HR Department and supervises an HR secretary and an HR specialist. As an ancillary function of their primary positions, various district and campus staff also perform HR tasks, including the superintendent, assistant superintendent, chief financial officer, campus principals, and department managers.

Gonzales ISD district and campus staff with HR roles and responsibilities perform the following activities:

FIGURE 4–2
GONZALES ISD AND PEER DISTRICT PAYROLL EXPENDITURES
SCHOOL YEAR 2018–19

CATEGORY	GONZALES ISD	CALHOUN COUNTY ISD	CASTLEBERRY ISD	TILLOGO MIDWAY ICD	PEER DISTRICT
CATEGORY	GONZALES ISD	COUNTTISE	CASILEDERRI ISD	TULOSO-MIDWAY ISD	AVERAGE
Total expenditures	\$24,894,575.0	\$33,772,419.0	\$41,196,757.0	\$35,898,202.0	\$36,955,793.0
Payroll expenditures	\$18,883,314.0	\$27,505,734.0	\$28,585,347.0	\$28,220,645.0	\$28,103,909.0
Payroll as a percentage of total expenditures	75.9%	81.4%	69.4%	78.6%	76.0%
Total staff FTE positions (1)	413.2	543.8	520.6	541.9	535.4
Total teacher FTE positions	182.1	263.9	243.0	283.9	263.6
Student enrollment (2)	2,859	3,834	3,780	3,926	3,847

Notes:

Sources: Texas Education Agency, Public Education Information Management System, Actual Financial Data, and Texas Academic Performance Report, school year 2018–19.

FIGURE 4–3
GONZALES ISD PERCENTAGE OF STAFF TYPES COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2018–19

STAFF	GONZALES ISD	CALHOUN COUNTY ISD	CASTLEBERRY ISD	TULOSO-MIDWAY ISD	PEER DISTRICT AVERAGE
Teachers	44.1%	48.5%	46.7%	52.4%	49.2%
Auxiliary staff	30.3%	28.1%	24.4%	26.8%	26.4%
Educational aides	11.8%	13.0%	12.8%	8.9%	11.6%
Professional support	9.2%	7.0%	10.3%	8.2%	8.5%
Campus Administration	3.0%	2.4%	4.3%	2.6%	3.1%
Central Administration	1.6%	0.9%	1.5%	1.1%	1.2%

Note: Percentages may not sum to due to rounding.

Source: Texas Education Agency, Texas Academic Performance Report, school year 2018–19.

- · post and update position vacancy listings;
- · conduct background checks of applicants;
- · process new staff;
- · process benefits enrollment;
- handle staff grievances;
- monitor the licensure status for all certified teaching staff;
- build the district's payroll budget;
- · maintain staff files; and
- · distribute and collect staff evaluations.

During school year 2018–19, Gonzales ISD employed 413.2 full-time-equivalent (FTE) positions to provide services to

2,859 students. **Figure 4–2** shows Gonzales ISD's actual payroll expenditure data compared to its peer districts in school year 2018–19. Peer districts are districts similar in size and other characteristics to Gonzales ISD that are used for comparison purposes. The peer districts for Gonzales ISD are Calhoun County, Castleberry, and Tuloso-Midway ISDs. Payroll expenditures for all four districts ranged from \$18.9 million to \$28.6 million. Gonzales ISD's payroll accounted for 75.9 percent of its total expenditures, which is the second least among peer districts.

Figure 4–3 shows the percentage of staff in six categories for Gonzales ISD compared to those of its peer districts. During school year 2018–19, Gonzales ISD employed the smallest percentage of teachers and the greatest percentage of central administration and auxiliary staff compared to its peer districts.

⁽¹⁾ FTE=full-time-equivalent positions.

⁽²⁾ Student enrollment shows counts from the Texas Academic Performance Report.

Figure 4–4 shows the student-to-teacher ratios and student-to-staff ratios for Gonzales ISD, its peer districts, the average of all districts served by regional Education Service Center XIII (Region 13), and the state average. Gonzales ISD has a student-to-teacher ratio of 15.7, greater than its peer districts, Region 13, and the state. Gonzales ISD has a student-to-staff ratio of 6.9, less than its peers, Region 13, and the state.

DETAILED ACCOMPLISHMENT

DEPARTMENTAL VISIBILITY

Gonzales ISD's Human Resources Department provides a clear, accessible pathway for human resources support.

The district's website includes a significant number of HR resources accessible to current staff and the public, including an HR Department staff directory, employee policies and procedures, district employment opportunities, new staff information, benefits information, information for substitutes, separation information, a health and wellness library, and many other useful HR resources.

Gonzales ISD's HR Department staff are accessible and visible in the district. District and campus staff reported that they are familiar with the HR Department and the appropriate staff to contact for HR-related issues. HR Department staff said that they schedule time to visit campuses weekly.

DETAILED FINDINGS

TRACKING AND DATA ANALYSIS (REC. 19)

Gonzales ISD does not perform data reporting, tracking, and analysis to support human resources management effectively.

The CHRO reports regularly and informally to the superintendent about staffing issues, such as terminations or new hires, but the CHRO and the HR Department do not provide management reports to support the HR function in the district.

Gonzales ISD had significant turnover during school year 2018–19, with district staff reporting that approximately 20.0 percent of staff left district employment. Employees that resign or retire fill out the Employee Resignation Retirement Form and the Exit Interview form that includes their reasons for leaving the district. The CHRO also conducts some in-person exit interviews for departing staff, but these interviews are optional, and the HR Department does not formally track the responses. Some district staff, including the CHRO, said that the departures of the previous

FIGURE 4–4
GONZALES ISD STUDENT-TO-TEACHER AND STUDENT-TOSTAFF RATIOS COMPARED TO PEERS, REGION, AND STATE
SCHOOL YEAR 2018–19

AREA	STUDENT-TO- TEACHER RATIO	STUDENT-TO- STAFF RATIO
Gonzales ISD	15.7	6.9
Calhoun County ISD	14.5	7.1
Castleberry ISD	15.6	7.3
Tuloso-Midway ISD	13.8	7.2
Peer District Average	14.9	7.2
Region 13	14.9	7.6
State	15.1	7.5

NOTE: Region 13=Regional Education Service Center XIII. SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2018–19.

superintendent and athletic director and the district's previous low accountability ratings were the primary drivers of turnover.

The HR secretary tracks educator certifications through a central tracking system and notifies staff via email or telephone of upcoming expirations. HR staff also track some mandatory district trainings for all staff using a software program, including bully prevention, child abuse and neglect, Family Educational Rights and Privacy Act, and bloodborne pathogen trainings. However, HR staff do not track certifications or mandatory trainings for other staff that require certificates or licenses to perform their job duties, such as coaching staff and staff in the Nutrition Services, Operations, and Transportation departments.

The assistant superintendent and campus principals manage the performance evaluations of teachers and teacher's aides, and the CHRO provides a detailed teacher appraisal calendar. The CHRO conducts performance evaluations for her direct reports, but does not monitor that all staff in the district receive annual performance evaluations. The district tasks individual department managers with conducting annual staff performance evaluations, but no central office staff monitor that these evaluations take place and are timely, meaningful, and documented for both the district and staff.

Some campus principals reported that department managers did not solicit their input for the performance evaluations of staff, such as custodians and nurses, who are supervised centrally but perform their daily duties on individual campuses. Although some campus principals said that they had given input for some staff, it is not a

required or consistently utilized component in the district's evaluation f hours on campuses under the supervision of the campus administrators, such as custodians, maintenance staff, food service workers, and nurses, may not receive input from the campus principals who are best positioned to evaluate their work.

Routine management reporting is a best practice that enables effective districts to track and analyze various data and trends that could influence future decision making for the district. HR reporting can provide districts with key insights regarding employee turnover, including analysis by department, exit interview responses and other metrics, which highlight areas that require closer attention. Monitoring key metrics also enables HR Department staff to identify new workforce trends, which can help the district address emerging problems. HR reports inform district administrators and provide department managers and campus administrators greater insight into staff-related issues, including attendance, performance, and recruitment and retention.

Effective districts reduce turnover by collecting quality exit interview data, analyzing trends, and utilizing this analysis to drive targeted improvements.

Killeen ISD uses a staff appraisal system that ensures all staff receive an annual evaluation. The district provides written procedures, forms, and an appraisal calendar. Contract renewals occur after filing and verification of each appraisal. The Killeen ISD superintendent assigned its HR Department the responsibility of overseeing and managing the appraisal system, writing procedures and updating them annually to ensure consistency, and developing the appraisal calendar for each staff group.

Gonzales ISD should develop reporting metrics and tracking systems for performance evaluations, certifications, and all mandatory trainings.

The CHRO should develop a set of routine management reports for review by the superintendent and department managers.

The CHRO should generate management reports to track metrics including, but not limited to, hiring, terminations, overtime, grievances, training, turnover, and staff absenteeism. To implement this recommendation, the CHRO should meet with other members of the superintendent's cabinet to assess the type of HR reporting that would be most useful to Gonzales ISD and the frequency with which those reports should be provided. The district

should then coordinate with the Technology Department to understand the reporting capabilities of the many systems used by the HR Department and the extent to which the current systems can support the reporting function. This reporting information also could be used to inform Gonzales ISD's strategic plans.

HR staff should conduct mandatory exit interviews or collect expanded exit survey data, analyze the data, and report on trends in reasons staff leave the district. The CHRO should disseminate this information to inform strategic planning in the district.

The district should implement a process to track all employee certifications. An electronic record-keeping system could be programmed to generate reminder emails to relevant staff in advance of certification expiration dates. The district should require for staff to send documentation to HR Department staff to confirm renewal. The HR Department should review all current staff files and identify those lacking necessary certificates. For those missing valid certificates, HR Department staff should contact staff supervisors to submit valid certificates. After all relevant files are updated with valid certificates, the HR Department should track all certification expiration dates in a database and establish a process that notifies staff of upcoming expiration dates. An electronic record-keeping system can conduct this tracking.

Additionally, Gonzales ISD should implement a centralized document management system to track all employee evaluations. This system should enable HR Department staff to initiate the evaluation process and distribute evaluations via email to all staff. It also should enable the routing of evaluations to the appropriate staff for input. Evaluations for department staff that service campuses, including custodial staff, maintenance staff, food service staff, and nurses, should be routed to campus principals for input before department managers approve the final evaluations. This process will ensure that all staff receive evaluations, and that department managers receive feedback from principals during performance evaluations of staff serving on campuses.

Since the time of the review, the district has implemented a centralized database for all performance evaluations.

The district could implement this recommendation with existing resources.

RECRUITMENT AND HIRING (REC. 20)

Gonzales ISD's hiring process is ineffective in recruiting qualified staff.

The district struggles to find qualified staff for all positions and lacks focused recruiting strategies.

Gonzales ISD has pursued initiatives to improve its recruitment of teachers such providing education and training courses at the high school level and promoting hiring teachers from alternative certification programs that enable teachers to teach while fulfilling their education requirements. The district relies heavily on regional job fairs for teacher recruitment. HR Department staff, sometimes accompanied by campus principals, attend these job fairs to advertise available teaching positions. However, the district lacks a formal recruitment plan and has not analyzed the effectiveness of its existing recruitment strategies.

If the district identifies a qualified teaching candidate at a job fair, it issues a letter of intent to the potential candidate. The HR Department also posts available teaching positions on the district's website and education recruitment websites. Campus principals review applications, submit potential candidates to the HR Department for background checks, and conduct interviews.

For department position vacancies, the HR Department posts the job opening on the Gonzales ISD website the TASB website, the Texas Association of School Business Officials website, and a major job search website. The department managers also may post the positions on other trade or professional sites. As candidates complete applications, department managers receive notifications and can identify the candidates that they would like to interview after HR staff perform background checks. The HR Department facilitates the hiring process, as well as setting up job fairs and attending them with hiring managers. The HR Department also creates all marketing materials for job fairs.

District staff reported that, although coaching staff in the district enter into dual coach/teacher contracts, hiring decisions are driven by coaching staffing needs rather than instructional staffing needs. According to staff, when the athletic director has identified a qualified coaching candidate, the district considers the coach's teaching certification, and campuses look for an area in which the coach can teach. Although coaching staff experience increased absences from teaching responsibilities due to games, competitions, and related travel, the district does not restrict which teaching positions can be included in dual-contract coach/teacher positions.

The district's decision to base the hiring process for dualcontract coach/teacher positions on coaching needs may contribute to difficulties recruiting and hiring qualified staff for all teaching positions. Coaching-related absences in critical courses may also negatively influence student achievement in the district.

Among campus staff surveyed by the Legislative Budget Board's School Performance Review Team, 44.0 percent disagreed with the statement that "highly qualified teachers fill job openings in the district," and 25.8 percent agreed that the district has an effective staff recruitment program.

Effective recruiting plans include short-term and long-term goals and objectives for each position or job category. Organizations start by deciding what key talent they have the most difficulty recruiting, and then determining where that talent is most likely to be. Organizations then define recruiting mechanisms and sources to be used for each position or category. Some of the most successful recruiting strategies use a combination of some of the following sources:

- social media, which provides an immediate way to attract job candidates. The organization must develop appropriate messaging, identify a targeted audience, and commit to following up with potential candidates regularly;
- referral programs, through which the organization encourages staff to recommend others within their networks. Referral programs can be useful additions to a social media strategy and often discover hard-tofind candidates who fit into the organization's culture;
- crowd sourcing, which is similar to a staff referral program but asks a broader group of people to recommend candidates who meet certain criteria.
 Social media can act as a vehicle for visitors to recommend candidates, and organizations also may design sections of their career websites for this purpose. Crowd sourcing can be a rich source of candidates when aimed at a targeted audience;
- career website, which is essential to any recruiting strategy. A robust, interactive career site should contain all the information for any interested candidates to learn more about an organization and what it has to offer applicants;
- community outreach programs that integrate existing outreach activities with recruiting, which provides a low-cost mechanism to build a workforce with higher loyalty and low turnover. These programs take time to develop, and the benefits are long-term; and

 college recruiting, through which the organization can establish relationships with potential candidates as early as the first year or second year of college. Building on those relationships can help bring new talent and needed skills into the organization. College recruiting can include internships or rotational programs to provide students work experience and to evaluate students for potential recruitment as staff.

Gonzales ISD should develop a targeted recruitment and retention plan.

The district should perform market research and develop a targeted and intentional recruiting strategy that is proactive rather than reactive. Although a competitive salary draws teachers, these candidates also may be considering other factors, such as opportunities for professional development. Based on the results of its market analysis, Gonzales ISD should revise its strategy to ensure greater success in recruiting and retaining qualified candidates. This strategy also may be informed by feedback obtained through exit interviews, surveys of substitute teachers, and review of various HR management reports focused on staff turnover, recruiting, and retention. The strategy also should be informed by an analysis of teacher absenteeism and determining an approach to address that issue, including through stricter guidelines for the use of professional development and vacation days and attendance incentives.

The district should establish procedures specific to the employment of dual-contract teachers. Gonzales ISD should develop certain employment guidelines through discussions with coaching staff and campus administrators. The district could consider the following examples of guidelines:

- limit dual-contract positions to the teaching of noncore subjects. Core subjects are the classes that are most critical to student learning, including mathematics and English Language Arts; therefore, teacher absences in these areas are most impactful;
- maintain hiring for special education teachers separately from dual-contract positions; and
- reassess the approach to filling dual-contract positions.
 Rather than first identifying a qualified coach, posted positions should identify the coaching and teaching subject needs so that only qualified candidates (i.e., those who can fill the open coaching and teaching position) respond.

A fiscal impact is not assumed for this recommendation. Any cost or savings would depend on the district's method of implementation.

JOB DESCRIPTIONS (REC. 21)

Gonzales ISD lacks an effective process to review and update job descriptions regularly.

The district reviews job descriptions on an ad hoc basis, as positions open or other needs arise. The CHRO maintains job descriptions centrally and shares them with department managers or campus principals as positions vacate or the superintendent approves new positions. The CHRO instructs department managers and campus principals to review job descriptions before open positions are posted. However, the CHRO or other HR Department staff do not centrally track that all job descriptions are reviewed and updated on a regular schedule.

Job descriptions for teacher positions are pulled from job description resources available to members of TASB. For other open positions, the HR Department typically sends a standard TASB job description or the previous version of the job description to the department managers for review and updating. Although Gonzales ISD has a process to ensure that current job descriptions are posted for prospective staff, the HR Department does not have a process to ensure that the current roles and responsibilities of existing staff are aligned with the recorded job description.

Without a written list of specific job responsibilities and work expectations, Gonzales ISD staff lack a clear and concise resource to guide their job performance. The lack of written job descriptions also deprives department managers and campus principals of a tool they could use to measure how well staff are meeting job expectations. Lack of accurate job descriptions could lead to problems regarding expected roles and responsibilities for staff. For example, terminated staff could use the lack of a job description as a way to challenge the termination in court. Additionally, accurate job descriptions are essential in the hiring process to screen applicants and ensure that job postings represent necessary skills.

Accurate, consistent job descriptions can help avoid discrimination claims, help to find and hire the right staff, provide analysis for classifying staff appropriately, and set standards for performance appraisal. Effective job descriptions also facilitate setting job standards and assigning pay grades. Inconsistent and inaccurate job descriptions can be a barrier

to effective personnel management, and may leave the district vulnerable to legal risks.

According to *The National Law Review*, an American law journal, job descriptions are addressed in the following federal statutes:

- Fair Labor Standards Act (FLSA) FLSA requires
 overtime pay for more than 40 hours worked in a
 week by nonexempt staff. The exempt or nonexempt
 status of staff is determined, in part, on staff's duties.
 A written job description or title is not sufficient
 to satisfy the exempt-status requirements, but an
 accurate list of essential functions could provide
 documentation to confirm staff's exempt status;
- Americans with Disabilities Act (ADA) The ADA requires reasonable accommodation for known physical or mental limitations of a qualified individual with a disability, unless to do so would impose an undue hardship on the employer. The duty to accommodate relates to the staff's essential job duties. Staff with a disability must be able to perform the essential functions of the job, with or without accommodation. If the staff with a disability is unable to perform an essential function of the job, even with an accommodation, the employer is not required to retain the staff in that position. In this regard, it is important that a job description identifies the position's essential functions;
- federal and state discrimination laws Many state and federal statutes prohibit discrimination based on a protected status. When faced with a claim of discrimination from staff, a well-written description could support the challenged decision, whether it is related to compensation, promotion, discipline, or discharge; and
- Family and Medical Leave Act (FMLA) FMLA requires that the staff's healthcare provider certifies that the medical condition for which the staff is seeking leave renders the staff unable to perform one or more job functions. FMLA further provides that, in accordance with specified conditions, an employer may require certification from the staff's healthcare provider recommending a return to work before the employer is required to return the staff to work following leave. To assist the provider in this assessment, the employer may attach a job description to the medical certification form. A complete and

accurate list of essential functions enables the provider to give an informed opinion.

Although no federal or state law requires job descriptions, they are an important tool in effective organizational management. Job descriptions also facilitate compliance with applicable statutes and policies. A thorough job description outlines the necessary skills, training, and education needed for the position. It also identifies the duties and responsibilities of the job. Job descriptions could serve as a basis for interviewing candidates, orienting new staff, and in evaluating job performance.

Preparing accurate job descriptions that reflect the actual job requirements and functions, and the existing job conditions, is a best practice. The Society of Human Resources Management provides a guide for including the following standard components of job descriptions:

- date when job description was written or last revision date;
- exempt or nonexempt job status in accordance with FLSA, and whether the job is full-time or part-time;
- position title;
- objectives of the position, including what the position is supposed to accomplish and how it affects other positions and the organization;
- identification of the supervisor to whom the staff in the position reports;
- supervisory responsibilities, including any direct reports to the staff in the position and the level of supervision required;
- summary of job responsibilities;
- essential functions, including a detailed description of tasks, duties and responsibilities;
- competency or position requirements, including a description of knowledge, skills, and abilities;
- quality and quantity standards that establish minimum levels required to meet the job requirements;
- required levels of education and experience;
- time required to perform tasks, which should be distributed to equal 100 percent if each task is expressed as a percentage of the staff's workday;

- physical factors, including the type of environment associated with the job, such as whether it is indoor or outdoor;
- working conditions, including a description of shifts and overtime requirements, as needed;
- unplanned activities and other duties as assigned;
- disclaimer specifying that the job description is not designed to cover or contain a comprehensive list of activities, duties, or responsibilities that are required of the staff; and
- validating the job description by recording the signatures of the manager and staff, including an additional signature line for highest-ranking administrator, confirming that all parties understand the requirements, essential functions, and duties of the position.

Gonzales ISD should review and update all district job descriptions annually to align job titles with the responsibilities staff perform. HR staff could accomplish this recommendation by following these steps:

- instruct all Gonzales ISD staff to identify all positionrelated tasks that they perform;
- require all supervisors to review these identified tasks, update current job descriptions, and submit them to the CHRO;
- review updated district job descriptions and remove all outdated job descriptions;
- distribute updated job descriptions and salary verifications to all staff to review and sign; and
- require supervisors to review job descriptions annually for staff that report to them and revise job descriptions accordingly.

The CHRO should develop written procedures for developing and updating job descriptions and communicate these procedures to all department managers to ensure awareness and compliance.

Since the time of the review, the district has purchased and implemented an online record system. District staff indicated that all job descriptions are being reviewed and that signature confirmation is required electronically through the new system. All new staff have received and confirmed job descriptions as a part of online onboarding.

The district could implement this recommendation with existing resources.

STAFF FILES (REC. 22)

Gonzales ISD does not ensure the proper storage of confidential staff files.

During the review team's onsite visit in March 2020, the team observed that the district maintains confidential staff information in several locations, including areas that are not always secured with a lock.

The CHRO maintains copies of teacher, principal, and central office staff performance evaluations in a cabinet in her office that remains locked when not in use. The HR specialist maintains at her desk FMLA files containing confidential staff information, such as medical and personal identifying information. These files are not stored in a locking cabinet, but the HR specialist said that she locks her door when she leaves her office.

Other staff files, including many from past years, are stored in a vault in the district's central office. Onsite observations and interviews with district staff indicated that central office staff do not consistently lock the vault.

In addition to staff records stored at the central office, other records are stored in the offices of department managers or in other department facilities. These records include evaluations, training records, and certifications of staff in the Technology, Transportation, Nutrition Services, and Operations departments. The district does not train department managers to understand what information is considered confidential and how it should be managed.

The district maintains paper records for all staff files. During school year 2019–20, the district purchased an electronic filing management system. Central office staff scheduled training and implementation of the system, but had not transitioned to the new system at the time of the review team's onsite visit. District staff reported that they plan to scan, digitize, and properly dispose of all paper records in the future.

The district's handling of staff records places the confidentiality of these materials at risk because unauthorized individuals may be able to gain access to them. Storing staff records in multiple locations increases the risk of unauthorized access to sensitive staff data. Keeping paper records further increases this risk and requires physical space for storage.

Developing a comprehensive staff file management system helps effective districts maintain accurate records and assists in compiling the documentation to meet federal, state, and local laws and regulations. Maintaining consistent and accurate files also reduces litigation exposure, protects staff, and improves processing efficiency.

Several best practice approaches and standards help to ensure the security of employee records, consistency in staff file management, and compliance with applicable statutes and regulations. San Elizario ISD's HR Department developed a process for ensuring that staff records are secure, complete, and easily accessible. The department stores files in easily accessible file cabinets and secures them behind a fire-resistant locking door. Several legends posted in the file room identify the location of specific files. The department also uses comprehensive checklists to enhance the accuracy and consistency of staff records and to ensure that staff gather all necessary information to comply with federal, state, and local laws and regulations. HR staff use the checklists to consistently order and file the documentation in the staff records. This process helps staff quickly determine when folders are incomplete so that they can prioritize obtaining needed information to comply with all applicable laws and regulations.

Waxahachie ISD has also developed a comprehensive staff file management process. This process includes physical security, monitoring for content completeness, and periodic auditing to ensure compliance with federal and state laws and local government retention regulations. The HR Department keeps critical files in locking file cabinets within a fireproof, cinderblock vault. The district segregates sensitive documents such as immigration forms, medical information, and criminal histories from the staff files in a separate locking file cabinet.

Effective school districts are shifting to electronic records systems. Electronic files reduce the need for physical storage space and for staff to generate, file, locate, and update hard-copy records. Electronic files enable easier and immediate access to important files. They also reduce the use of paper and related costs and are not subject to environmental effects. Several school districts, institutions of higher education, and private companies are moving toward issuing electronic letters of intent and contracts, which improve record accuracy, develop efficiencies through electronic routing and processing, eliminate the need for manual data entry, and eliminate paper transfers among offices.

Gonzales ISD should secure all staff files and confidential information in locking, fire-rated cabinets.

Through discussions with departmental and campus leadership, the CHRO should assess all of the locations where staff files are maintained, and should retrieve and store any confidential personnel files that are maintained outside of HR staff control.

The CHRO should communicate with Gonzales ISD staff the importance of controlling access and provide guidance for the proper storage of staff records, including procedures for maintenance of electronic files with personal information.

If the district continues to store staff records in the vault, the superintendent and the CHRO should develop written procedures limiting access to HR Department staff and require that staff lock filing cabinets when not in use.

The district should strictly control and monitor access to records, whether paper or electronic. The HR Department should develop a tracking system for paper records that shows their location and who accessed the records, for what reasons, and what actions or changes occurred. Those who have custody and daily management and maintenance of staff records must protect their confidentiality and understand the legal requirements associated with these records. The CHRO should continue with plans to convert the paper records maintenance process to an electronic staff records process.

Since the time of the review, the district has fully implemented their purchased online electronic record-keeping system. District staff indicated that they have created an online, comprehensive checklist for electronic files to enhance the accuracy and consistency of staff records and to ensure that staff gather all necessary information to comply with federal, state, and local laws and regulations.

A fiscal impact is not assumed for this recommendation. Although the district may need to purchase additional filing cabinets to implement this recommendation, the fiscal impact depends on the volume of paper files remaining after the digitization of records.

SUBSTITUTES (REC. 23)

Gonzales ISD's staff absenteeism exceeds the availability of qualified substitutes.

According to information gathered from district and campus staff interviews, Gonzales ISD experiences more staff absence than the available pool of substitutes can support.

The district's leave policy for staff includes five state-mandated days for personal leave, five days of district sick leave, five vacation days for staff employed by the district for fewer than three years, and 10 vacation days for staff employed by the district for three or more years.

Gonzales ISD staff reported that in previous years, campus administrators permitted instructional staff to take vacation leave at any time. Some staff perceived that this practice contributed to higher levels of absenteeism in the district, especially among staff at particular campuses. Additionally, staff reported that teachers also serving as extracurricular sponsors or coaching staff are absent from teaching responsibilities for games, competitions, and other special events. The district does not encourage attendance through incentive programs, nor does it have policies or procedures limiting the use of vacation time during the instructional year.

The district recruits substitute instructional staff, including teachers and instructional aides, through advertisements on the district website, the local newspaper, the district's social media accounts, and an online recruiting website. In Gonzales ISD, daily substitute teacher pay ranges from \$65 to \$95, which increases by \$10 per day after 11 consecutive days.

Monthly, the HR specialist conducts a training and orientation session for new substitutes. The training includes curriculum and materials developed by the assistant superintendent.

Campus principals reported that substitute teacher shortages frequently interrupt student instruction. These temporary staffing shortages force campus principals to make adjustments, such as dispersing students to other classrooms and reassigning paraprofessional or other support staff to cover critical shortages.

Teacher absenteeism disrupts the established learning environment and can influence student learning negatively. Excessive absenteeism can lower student test scores and achievement and can result in financial burdens for the district.

Although substitute shortages are widespread among school districts nationwide, effective school districts implement strategies to decrease discretionary absences, such as buybacks of unused leave or bonuses for exceptional attendance.

AASA, the School Superintendent's Association, a national professional organization for superintendents, observed that

school districts have implemented the following measures to address shortages of substitute teachers:

- pay increases some districts increase pay in amounts ranging from 50.0 percent to 75.0 percent to compete with other local districts;
- reduce demand some schools ask permanent teachers to fill teacher vacancies in other classrooms during their preparation periods to reduce the need for substitutes; other districts pay teachers for unused sick and personal leave;
- aggressive recruiting districts use targeted advertising coupled with job fairs cosponsored by colleges and universities, parent-teacher organizations, and regional educational service centers;
- temporary staffing services temporary agencies contract with districts to staff classrooms when the demand for substitute teachers becomes too great;
- lower requirements many states and districts have lowered their substitute teacher certification requirements and now require a four-year or two-year degree, often not limited to the field of education;
- bonuses: incentives ranging from \$5 to \$15 per day are offered to substitute teachers who teach 85.0 percent or more of the semester; and
- professional development restrictions some districts prohibit the scheduling of in-service programs on Fridays or during December, the most challenging times to find classroom coverage.

AASA further observes that the most effective districts combine these strategies with strong substitute training. The Tooele County School District, near Salt Lake City, Utah, surveyed its substitute teachers on their working conditions and applied its analysis of the results to increase substitute teacher recruitment and retention.

Gonzales ISD should conduct an analysis of substitute compensation and develop procedures and programs to increase staff attendance.

The district should conduct market research and survey substitutes to improve recruitment and retention of substitute teachers. Based on the results of that analysis, Gonzales ISD should adjust its process to attract more substitute teacher candidates. Adjustments may include better marketing, increased pay, and premiums for more challenging placements.

The CHRO should analyze trends in teacher absences and coordinate with the superintendent and campus principals to develop procedures to limit discretionary absences and provide incentives for attendance.

Since the review team's onsite visit, the district added language to the school year 2020–21 Employee Handbook to address attendance issues on key days.

A fiscal impact is not assumed for this recommendation. Any cost or savings would depend on the district's method of implementation.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

5. FACILITIES MANAGEMENT

Gonzales Independent School District (ISD) has six campuses, all located in downtown Gonzales. Buildings at the six campuses range in age from four years to nearly 80 years, and several additions and portable buildings have been added to expand capacity. The campuses include a preschool and kindergarten campus (Gonzales Primary Academy), three elementary schools (Gonzales East Avenue Primary School, Gonzales Elementary School, and North Avenue Intermediate School), a junior high school (Gonzales Junior High School), and a high school (Gonzales High School). Instead of serving students who live in different areas of town, the elementary schools are categorized by grade level, and each school serves two grades as follows: East Avenue Primary School, grades 1 and 2; Gonzales Elementary School, grades 3 and 4; and North Avenue Intermediate School, grades 5 and 6.

FINDINGS

- ♦ Gonzales ISD lacks a planning protocol for facilities management and future facility needs.
- ♦ Gonzales ISD does not manage, measure, or monitor its energy use.
- ♦ Gonzales ISD lacks documented procedures for the maintenance and custodial functions.

RECOMMENDATIONS

- ♦ Recommendation 24: Develop a comprehensive long-range facilities master plan that includes an annual facilities audit and ongoing preventive maintenance program.
- ♦ Recommendation 25: Develop and implement an energy management plan to conserve energy and reduce annual energy costs.
- ♦ Recommendation 26: Develop detailed operating procedures for maintenance and custodial-related functions.

BACKGROUND

An independent school district's facilities program provides safe and clean learning environments. A school district's facilities include campuses, buildings, grounds, athletic facilities, portable buildings, and supplemental facilities (e.g., storage, warehouses). Facilities management includes planning for facilities use, construction of projects, and maintenance of infrastructure (e.g., electrical, plumbing, irrigation, heating, and cooling).

Managing facilities is dependent on a district's organizational structure. Larger districts typically have staff dedicated to support facilities management, and smaller districts may have staff with dual roles. For example, staff may be responsible for custodial and groundskeeping tasks. Facilities planning establishes district priorities, allocates resources and funds, and identifies milestones. Planning is based on student enrollment, campus and building capacity, facilities condition, curriculum needs, and state regulations. Management of construction and maintenance projects should include contract management, cost control, and a project schedule with defined milestones. Facilities maintenance requires a program for planned maintenance of facilities and equipment, and routine cleaning of facilities to ensure a safe environment for students and staff.

Gonzales ISD's director of operations oversees the buildings, maintenance, custodial, and transportation functions of the district. This chapter discusses the maintenance and custodial functions of the Operations Department; see the **Transportation Management** chapter for a discussion of the transportation function.

Gonzales ISD manages its own custodial services, overseen by a custodial supervisor, and employs 30 full-time custodial staff and five substitute custodial staff. The maintenance supervisor oversees 10 maintenance staff including the maintenance coordinator, maintenance and grounds staff, electrician, and heating, ventilation, and air conditioning (HVAC) technicians and the operations secretary. The general maintenance staff maintain mechanical equipment and district facilities. The grounds staff maintains the landscaping and grounds for the athletic fields and outsources the groundskeeping for the campuses. **Figure 5–1** shows the reporting structure for the maintenance and custodial functions in the Operations Department.

Figure 5–2 shows Gonzales ISD facilities indicating the year of original construction and square footage. The district maintains 578,154 square feet in campus and administration

buildings and an additional 51,000 square feet of portable buildings used for maintenance and storage.

In addition to the facilities shown in **Figure 5–2**, Gonzales ISD owns two parcels of land. One is approximately 80.0 acres that the district is considering as a site for possible construction of a future high school campus. The other parcel is approximately 11.0 acres near the current maintenance facility that the district has listed for sale.

DETAILED FINDINGS

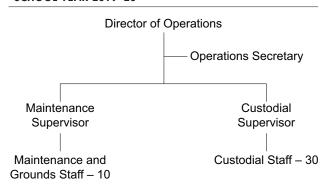
FACILITIES PLANNING AND MAINTENANCE (REC. 24)

Gonzales ISD lacks a planning protocol for facilities management and future facility needs.

The maintenance of facilities in the district is prioritized through an informal checklist of items to be fixed. According to the director of operations, there is no formal process for identifying and tracking deferred maintenance and no ongoing preventive maintenance list for facilities and equipment, except for HVAC systems. Most repairs are identified by campus principals and staff, campus maintenance staff, or during periodic campus visits by the director of operations and maintenance supervisor. Campus maintenance staff typically address maintenance tasks and consult specialists as needed for larger repairs or in cases of emergency. This informal process allows the district to troubleshoot facilities issues as they arise, but it does not enable the district to anticipate and budget for large repairs or replacement costs on an ongoing basis.

Gonzales ISD facilities are not managed according to a centralized plan that identifies priorities, goals, and objectives based on building plans, anticipated needs, and timelines. The district did not provide a facilities condition report. However, the district contracted with the Texas Association of School Boards (TASB) for a comprehensive facility evaluation during school year 2019-20 to begin developing a facilities master plan. The Legislative Budget Board's School Performance Review Team visited the district in March 2020. At the time of the onsite visit, the district had not received the results of the facilities evaluation. The director of operations reported that the district expected to receive the TASB report before the end of school year 2019-20. According to the director of operations, the district does not regularly develop facility condition reports, maintain a deferred or preventive maintenance list, or conduct an annual audit of district facilities.

FIGURE 5–1
GONZALES ISD OPERATIONS DEPARTMENT
ORGANIZATION (1)
SCHOOL YEAR 2019–20



NOTE: (1) Figure shows the maintenance and custodial functions of the Operations Department.

SOURCES: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

FIGURE 5–2
GONZALES ISD FACILITIES
DECEMBER 2018

FACILITY	YEAR OF CONSTRUCTION	SQUARE FOOTAGE
Gonzales East Avenue Primary School	1959	71,312
Gonzales Primary Academy	2016	48,998
Gonzales Elementary School	2000	77,017
North Avenue Intermediate School	1941	72,570
Gonzales Junior High School	1941	117,931
Gonzales High School	1965	181,786
Football Stadium	1963, with addition in 2009	3,400
Administrative Office Building	1990	4,500
Maintenance and Transportation Building	1992	640
Total		578,154

SOURCE: Gonzales ISD Property Schedule, La Vernia Insurance Agency, 2018.

During March 2019, the Texas Department of State Health Services (DSHS) inspected all Gonzales ISD facilities. The federal Asbestos Hazard Emergency Response Act requires every public and nonpublic elementary and secondary school for grades kindergarten to 12 to complete a preliminary inspection for asbestos and a reinspection of assumed and known asbestos at least once every three years in each building that is leased, owned, or otherwise used as a school

building. DSHS's only reported deficiency was the lack of a facilities management plan.

According to the chief financial officer (CFO), the district's voters authorized a bond in 2013 to finance several facilities initiatives including:

- purchase and renovate a former downtown grocery store for use as the Early Childhood Center;
- construct a band hall at the high school campus;
- construct a student center at the high school campus;
- add a secured front entrance at the high school campus;
- add a secured front entrance at the junior high school;
- pave the lot at the transportation yard; and
- add a bus wash station at the transportation yard.

Based on interviews with staff, the district leases land from the City of Gonzales for the campuses of the Gonzales Junior High School, North Avenue Elementary School, and East Avenue Elementary School, and the football stadium. The district has not communicated with the city to determine how the leased property will affect future facilities planning.

The lack of a formal planning protocol between major construction and renovation projects increases the likelihood that some elements of facilities planning will be postponed, deferred, neglected, or forgotten. This lack of a formal plan can lead to a lack of planning concerning critical facility needs and insufficient attention to setting completion goals, schedules, and deadlines for ongoing facilities management, maintenance, and operations tasks. For example, one of the larger upcoming capital expenditures is repairing the junior high school's leaking roof, which the district identified as deferred maintenance. Without a planning protocol to address critical facility needs, these items may not be costed properly or may have insufficient budgeting, may lack risk and implementation plans, and may lack leadership support that could be gained as part of a facilities master planning process. A consequence of roof breaches typically is collateral damage caused by the intrusion of water, including damage to interior finishes, furnishings, fixtures, and equipment. Leaked water can short-circuit electrical systems, which increases the risk of fires. Computer labs and server rooms are especially vulnerable to expensive damage.

A formal facilities planning protocol involves considering and planning for all of the necessary elements for an organization to develop a long-range facilities master plan as a guideline for future construction and renovation programs. A comprehensive school facility master plan can include the following elements:

- an extensive evaluation of the condition and educational functionality of existing buildings and sites;
- a capacity analysis of all district education facilities, representing the district's instructional programs;
- an evaluation of each campus and facility to determine its best use, considering local programs and space requirements;
- a determination of technology capabilities within existing facilities;
- information about school facilities' compliance with state and federal mandates:
- a series of recommendations and options available to the district to meet current and projected facility needs;
- a 10-year enrollment forecast by grade and by campus for the entire district;
- an annual facilities audit to determine the condition of buildings and grounds; and
- an ongoing preventive maintenance program that prioritizes issues identified during the annual facilities audit.

As the Gonzales ISD Board of Trustees and district leadership changes, having a long-term facilities master plan adds stability and cohesiveness to the district's construction, use, and management of facilities. Effective districts often use a guide, such as the Texas Education Agency's (TEA) 2003 Planning Guide for Maintaining School Facilities, to help them begin the process of developing an effective master plan. **Figure 5–3** shows TEA's recommended program elements for districts to develop a comprehensive long-range facilities master plan.

A developed facilities master plan supports a highly effective educational system across many operational areas. Examples include the following functions:

FIGURE 5-3
SAMPLE LONG-RANGE FACILITY MASTER PLAN ELEMENTS, CALENDAR YEAR 2003

PROGRAM ELEMENT	MISSION	RESPONSIBILITIES	PLAN ELEMENTS
Planning	Needs assessment	Identify current and future needs	Demographics, facilities survey, boundary, funding, education program, market, staff capability, transportation analysis
	Scope	Outline required building areas; develop schedules and costs	Programming, cost estimating, scheduling, cost analysis
	Strategy	Identify structure	Facilities project list, master schedule, budget plan, organizational plan, community involvement plan
	Public approval	Implement public relations campaign	Public and media relations
Approach	Management plan	Detail roles, responsibilities, and procedures	Program management plan and systems
	Program strategy	Review and refine details	Detailed delivery strategy
	Program guidelines		Educational specifications, design guidelines, computer-aided design standards

Source: Texas Education Agency, Recommended Planning Model for Facilities and Planning, 2003.

- providing a baseline element for decision making across the district;
- ensuring that current and long-range educational programming needs are and will be met;
- providing a conduit for input from all stakeholders, including the community, parents, students, and staff;
- ensuring that the district's requirements and goals are clearly communicated; and
- providing the starting point for the development of bond proposals needed to support facility improvements in support of educational initiatives.

In addition to facilities planning, facilities maintenance is an ongoing process that effective school districts include as part of a facilities master plan. Gonzales ISD has several older buildings that require significant ongoing repair and maintenance. The campuses are well-maintained for their age, but the district has a backlog of larger projects. According to staff interviews and the review team's observations during campus visits, the older campuses are most in need of repairs, including the Gonzales junior high school, Gonzales East Avenue Primary School, and Gonzales North Avenue Intermediate School. The campuses in the best condition are newer, including Gonzales Primary Academy, Gonzales Elementary School, and Gonzales High School.

Additionally, the district uses several portable buildings for storage of aged furniture and old equipment across the campuses, including at the junior high school and Gonzales North Avenue Intermediate School and at the maintenance facility. Many of the portable buildings are old and unfit for students, and although they are useful for storage, they result in blight on some of the campuses.

Onsite interviews with staff highlighted the facility issues across the district's six campuses. The issues were categorized either as needs, which are issues that require primary attention, or as wants, which are additional improvements that principals would like to make but are not critical. **Figure 5–4** shows facilities requests that were identified during the review team's group discussion with campus principals. It is not an exhaustive list of district facilities issues.

School districts can prevent deferred maintenance by implementing proper preventive maintenance procedures. Effective districts include the following elements in their school maintenance programs:

- commitment to facility maintenance from the board, the superintendent, and senior staff;
- development of a comprehensive preventive maintenance program;
- adequate funding for both preventive maintenance and capital improvements;
- consideration of new ideas for construction and maintenance of facilities;

FIGURE 5–4
GONZALES ISD FACILITIES LIST OF WANTS AND NEEDS, MARCH 2020

CAMPUS	WANTS	NEEDS
Gonzales Primary Academy	Display the school name on the building Purchase of old library	Key card access
Gonzales East Avenue Primary School	Build casing to showcase the original bell	 Upgrade gym (insulation, plywood, remove chain-link area, rim heights) Fresh paint (White) Grounds maintenance (leaves, flooding, pest removal of cockroaches and snakes) Heating, ventilation, and air conditioning (HVAC) duct work needs thorough cleaning Improved ventilation Security cameras Key card access
Gonzales Elementary School	New carpetingUpgrades to the front office	New playgroundSecurity camerasKey card access
Gonzales North Avenue Intermediate School	Auditorium	 Upgraded, energy-efficient lighting Fresh paint (Navajo White) Gym floor painting Sanding and painting rusted awning poles Patio repairs Provide shade for playground Replace planter boxes Security cameras Key card access
Gonzales Junior High School	 Place basketball rims at proper heights Soccer field (stadium with turf) Build casing to showcase the original bell 	 Remove portable buildings Car riding lane Cover for band and art access Roof repair Air conditioning for the hallways Fence around the perimeters Fresh paint (Navajo White)
Gonzales High School	 Reduced classroom sizes Upgraded furniture Taller railing in front of the school Awning for patio 	 Upgraded, energy-efficient lighting Testing for mold and air quality Fresh paint (Navajo White) New tile Security cameras Key card access

Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

- exploration of new and different ways to pay for maintenance and construction needs;
- review of district goals and policies to make sure facility management receives appropriate levels of funding in the annual budget cycle; and
- connection of academic programs to facilities needs through a plan.

An annual facilities audit and regular preventive maintenance are essential components of a facilities master plan. These components protect a school district's most costly assets and help to meet the educational programs' present and subsequent needs. Annual auditing and regular inspection of school facilities enables the clear understanding, documentation, and communication of the current condition and budgetary needs of district buildings, systems, and sites.

An annual audit provides the following benefits:

- increasing the likelihood of identifying failures or faults to a building's components or systems in time to perform repairs in lieu of a total replacement, which may reduce or control maintenance costs;
- helping to establish preventive maintenance protocols and schedules; and
- · providing the basis for long-range planning.

Gonzales ISD should develop a comprehensive long-range facilities master plan that includes an annual facilities audit and ongoing preventive maintenance program.

Establishing a long-range facilities master plan and preventive maintenance plan will enable the district to establish purpose, direction, and priorities regarding facilities management and help it utilize assets more effectively. The first step in developing a facilities master plan is to adopt a formal facilities planning process. This is necessary to ensure that the district can maintain its facilities within available funding and to a level that supports an effective educational program. Using input from the campus principals and the custodial and maintenance staff, the superintendent and the director of operations should begin determining future improvements by considering the following key steps:

- involvement of all stakeholders in the planning process, including the establishment of a facilities committee;
- reviewing and analyzing maintenance work that has been deferred to determine its current necessity;
- identifying current needs including safety, accessibility, and energy improvements;
- determining the training necessary to ensure that maintenance staff are able to support and implement planned improvements;
- establishing both facility and educational programming priorities;
- using data to inform decision making and to gain stakeholder support;
- · identifying funding sources for the work; and
- implementing a process for the ongoing monitoring of the plan.

The director of operations, the maintenance supervisor, and the custodial supervisor should develop a continuous facilities planning process for approval by the board and the superintendent. This process should contain the following elements:

- an annual audit of all district facilities, including all critical repairs and maintenance and a prioritized list of all deferred maintenance needs;
- a five-year plan in which each year contains specific programs, projects, actions, and required funding;
- when the current year is ready for implementation, the district should add a new year to the program to maintain the five-year horizon;
- a detailed preventive maintenance plan, organized by building and equipment and focused on the ongoing maintenance and repair of identified facilities assets that require upkeep; and
- a deferred maintenance schedule that specifies a detailed backlog of all district maintenance activities prioritized by building and equipment. A timeline for performing deferred maintenance activities also should be clearly established.

The district continuously should review and update the information within each plan year as new data and information become available. The continuous planning process is a dynamic activity that enables a school district to be highly responsive to changes in demographics, educational technology, trends in teaching methods, and subject matter emphasis.

The programs, projects, and actions for each year come from these categories:

- data and other information collection, analysis, and inputs to planning;
- facilities planning, programming, design, and construction actions;
- renovations, additions, rehabilitation, major repairs, and other capital improvements;
- · preventive and reactive facilities maintenance; and
- custodial services, security and safety, and facilities operations.

Additionally, the district should consider the recommendations from the TASB facilities evaluation report as a basis for the long-term facilities plan, including the following issues:

- five-year history and five-year projection of student enrollment by grade and site;
- · demographic estimates of population growth;
- · estimates of campus capacity by year;
- long-range facilities projects and development plans;
- · construction and capital improvement plans; and
- financial projections.

The district could implement this recommendation with existing resources.

ENERGY MANAGEMENT (REC. 25)

Gonzales ISD does not manage, measure, or monitor its energy use.

The district has both an HVAC technician and an electrician on staff in the Operations Department to provide maintenance and upkeep of heating, cooling, and electrical systems at campuses and district buildings. According to campus principals, most repair orders are initiated by the principals or campus staff and communicated to the Operations Department. Based on interviews with custodians, individual campuses have instructed staff on when to turn off lights for the day, and thermostats are managed according to when staff and students are in the buildings.

No staff are assigned to review the district's utility bills monthly to identify errors or discrepancies, or to maintain a spreadsheet of utility use rates so that sharp increases in service or deviations can be researched. Additionally, the district does not have a procurement board policy requiring that new equipment be energy efficient.

During school year 2017–18, the district contracted for a third-party engineering review with an independent energy consultant to develop an energy audit report. The report's recommendations included the implementation of light-emitting diode (LED) lighting, and automation of the HVAC systems. The report estimated that \$177,934 in annual energy savings could be achieved through implementing building automation systems, interior and exterior LED lighting, redesigning and ducting of eight

HVAC units at the junior high school, 128 wireless plug load-management devices across the campuses, and roof replacement at the junior high school. According to ENERGY STAR, the government-backed program that promotes energy efficiency, energy is the single largest operating expense in buildings, and the average building wastes 30.0 percent of the energy it consumes.

According to the CFO, the board did not execute the recommendations from the report due to skepticism about the potential energy savings and the high cost of implementing the recommendations.

Texas school districts are required to develop energy management strategies to reduce their overall consumption of energy. The Texas Education Code, Section 44.902, requires each school district to establish a long-range energy plan to reduce and maintain its annual electric consumption by 5.0 percent. In addition to this basic mandate, the plan should include:

- strategies for achieving energy efficiency that result in net savings for the district, or could be achieved without financial cost to the district; and
- the initial, short-term capital costs and lifetime costs and savings that could result from implementation of each strategy. An effective energy management plan includes strategies for using the minimum amount of energy while continuing to provide a desired level of comfort to building occupants. These strategies should include the education of building staff, enhancements to or automation of building controls, proper maintenance of existing equipment, and installation of energy-efficient equipment as systems are replaced.

Gonzales ISD has not developed a statutorily required, comprehensive energy plan that includes these strategies or identifies actions to support the district's annual reduction in energy usage. Without a comprehensive energy management plan, Gonzales ISD cannot identify strategic actions to support its annual reduction in energy usage and could fail to meet the statutorily required reduction of energy consumption. Furthermore, the absence of an energy management plan increases the risk that the district could engage in energy management contracts that do not consider the district's goals and objectives.

The Texas State Energy Conservation Office (SECO) offers free assessments of school district facilities

to identify opportunities for savings, which may result through systems retrofits or through the maintenance and operation of facilities. This service, known as a Preliminary Energy Assessment (PEA), is intended to identify and recommend cost-effective renovations, equipment upgrades, or changes to building operations that could be implemented to reduce utilities costs or consumption.

PEA includes the following elements:

- analysis of utility bills and other building information to determine energy and cost utilization indices for facilities;
- recommendations of maintenance procedures and capital energy retrofits that will positively affect energy consumption;
- recommendations for the development and monitoring of customized procedures to control the run times of energy-using systems;
- onsite training for building operators and maintenance staff;
- follow-up visits to assist with implementing the recommendations and to determine savings associated with the project;
- development of an overall energy management policy;
- assistance with developing guidelines for efficiency levels of future equipment purchases; and
- facility benchmarking using the ENERGY STAR Portfolio Manager.

Gonzales ISD should develop and implement an energy management plan to conserve energy and reduce annual energy costs.

To implement this recommendation, the director of operations should develop an energy management plan that includes a mission statement and specific energy conservation and building management guidelines. These guidelines should include policies for setting classroom temperatures and communication and enforcement strategies. The energy management plan also should include the following components:

• establish monthly review and monitoring of electric usage by staff appointed by the superintendent;

- evaluate installed controls to ensure that systems are functioning correctly; as part of this evaluation, the district should check independent motion detectors for controlling lights and HVAC systems, check night and weekend set-back controls, and conduct preventive maintenance tasks such as fixing leaks to reduce water consumption;
- perform energy surveys to identify solutions for systems or operational practices that are wasting energy;
- develop department procedures for closing windows and doors and for controlling exhaust fans to reduce the cost of heating and cooling;
- prepare a schedule for regular cleaning, maintenance, and filter changes of HVAC equipment to ensure indoor air quality and extend the equipment life;
- adopt standards for routine maintenance that require the use of energy-efficient equipment; for example, all relamping or fixture replacements should be based on high-efficiency fluorescent or LED technology; and
- draft an incremental plan to increase staff awareness; for example, district staff should be encouraged to place equipment with high-energy use, such as coffee pots and refrigerators, in common rooms instead of keeping personal equipment in classrooms and offices.

Additionally, the district should review the 2017 energy efficiency study to either determine what portions of the report, such as LED lighting, duct work, and roof replacement, can be implemented by the existing staff; or reconsider the projects for implementation by external contractors based on a cost-benefit analysis.

The district also should consider seeking assistance from SECO to obtain an energy assessment of its facilities.

No fiscal impact is assumed for this recommendation. Any savings or costs will depend on how the district implements an energy management initiative.

FACILITIES PROCEDURES (REC. 26)

Gonzales ISD lacks documented procedures for the maintenance and custodial functions.

Based on interviews with maintenance and custodial staff, new staff learn most of their duties through on-the-job training by experienced staff. New staff receive an orientation by either the maintenance or custodial supervisor on their general duties and then are assigned to a campus. Once there, new staff receive campus-specific training from experienced staff.

Based on interviews with staff, the district has experienced high turnover in both maintenance and custodial staff during the past three years. However, the district lacks written procedures or onboarding programs for new staff. Without procedures, new staff operate with limited knowledge of their duties and without a written guide to inform their work.

Effective districts establish standardized procedures that have clear guidelines. These procedures encourage self-management, limit arbitrary action, provide a basis for measuring performance, and provide a defense against human resources complaints.

The National Center for Education Statistics (NCES) is the primary federal entity responsible for collecting and analyzing data related to education. Its *Planning Guide for Maintaining School Facilities* recommends that effective maintenance and operations procedures manuals, at a minimum, contain a mission statement, personnel policies, purchasing regulations, accountability measures, asbestos procedures, repair standards, vehicle use guidelines, security standards, and work order procedures.

Maintenance and operations include the following procedures:

- names and locations of vendors from whom staff can purchase maintenance supplies;
- standard forms, including inspection checklists;
- work order procedures;
- safety procedures;
- procedures for major types of maintenance work (e.g., minor plumbing, roof repair, lighting repair, and electrical work); and
- emergency and crisis situations and procedures.

Custodial functions include the following procedures:

- · standard forms and checklists;
- cleaning standards (classrooms, restrooms, gyms, locker rooms, showers, offices, libraries, and other areas);

- cleaning procedures, including those for supplies, basic office cleaning, restroom cleaning and sanitation, and hard surface floor maintenance (dusting, mopping, stripping, finishing, burnishing);
- custodial relations with others;
- · custodial rights and responsibilities;
- · head custodian duties and responsibilities;
- custodial certification;
- safety procedures;
- integrated pest management;
- · playground inspections;
- recycling and refuse; and
- · energy management guidelines.

San Angelo ISD's website provides a good example of facilities maintenance procedures.

The Gonzales ISD Operations Department should develop detailed operating procedures for maintenance and custodial functions.

Using the 2003 NCES maintenance and operations procedures manual and the San Angelo ISD facilities maintenance procedures manual as guides, and considering Gonzales ISD supervisor and staff input, the director of operations should develop an operating procedures manual, meet with staff to discuss the contents of the manual and which areas are applicable to each group, and conduct training necessary to implement the procedures.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATION

During the onsite visit, the review team observed an additional issue regarding the district's programs and services to students, staff, and the community. This observation is presented for consideration as the district implements the report's other findings and recommendations.

The custodial staff per square feet key performance indicator, a quantifiable measure used to evaluate the success of an organization or staff in meeting performance objectives, shows that each custodian manages an average of 19,000 square feet. Each Gonzales Elementary School custodian

maintains an average of 13,000 square feet, and each Gonzales Junior High School custodian maintains 25,000 square feet. Redistributing one custodial staff from Gonzales Elementary School to Gonzales Junior High School could help manage the workload at the junior high school without affecting cost or performance.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, which the district should review to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

6. INFORMATION TECHNOLOGY MANAGEMENT

Gonzales Independent School District's (ISD) Technology Department manages the district's network, hardware, and software support needs. The superintendent supervises the Technology Department, which includes the director of technology, a network technician, a district technician, district support, district systems integrator, secretary, and seven campus-based technology support staff. For school year 2019–20, Gonzales ISD budgeted approximately \$642,265, or 2.4 percent of its total budget, for technology.

FINDINGS

- ♦ Gonzales ISD's Technology Department lacks the appropriate staff and organizational structure to provide the most efficient and effective customer support.
- ◆ Gonzales ISD does not follow a comprehensive technology planning process based on identified needs and goals.
- ◆ Gonzales ISD's Technology Department lacks documented procedures to guide the implementation of technology support responsibilities.
- ◆ Gonzales ISD Technology Department staff lack adequate training to support all the technology used in the district.

RECOMMENDATIONS

- ♦ Recommendation 27: Reorganize and supplement technology staffing to provide efficient coordination of technology use and effective technology support districtwide.
- ♦ Recommendation 28: Develop and implement a comprehensive technology plan.
- ♦ Recommendation 29: Develop a detailed Technology Department operations manual that governs department operations and activities.
- ♦ Recommendation 30: Establish and implement a staff development program to deliver necessary training to all technology-related support staff.

BACKGROUND

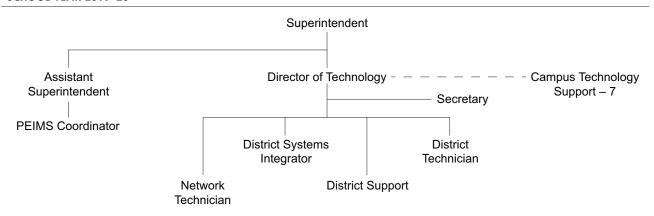
An independent school district's technology management affects its operational, instructional, and financial functions. Technology management requires planning and budgeting, inventory control, technical infrastructures, application support, and purchasing. Managing technology is dependent on a district's organizational structure. Larger districts typically have staff dedicated to administrative or instructional technology responsibilities, and smaller districts may have staff responsible for both functions.

Administrative technology includes systems that support a district's operational, instructional, and financial functions (e.g., financial management, human resources, payroll, student attendance, grades, and Public Education Management Information System reporting). Administrative technology improves a district's operational efficiency through faster processing, increased access to information, integrated systems, and communication networks. Instructional technology includes the use of technology as a part of the teaching and learning process (e.g., integration of technology in the classroom, virtual learning, and electronic instructional materials). Instructional technology supports curriculum delivery, classroom instruction, and student learning.

Figure 6–1 shows the organization of the Gonzales ISD Technology Department.

The director of technology leads the Gonzales ISD Technology Department. The Legislative Budget Board's (LBB) School Performance Review Team visited the district during March 2020 and conducted several focus group and individual interviews. The director of technology said the position's daily activities include assigning work orders to staff, performing administrative departmental tasks, conducting a daily Technology Department meeting, and visiting district campuses. All the technical support positions help manage the district help desk system, resolving technology issues for district staff that range from simple to complex. Technology staff tag and inventory technology equipment, such as laptop computers and tablet computers, update software on district computers, and install interactive boards in classrooms.

FIGURE 6–1
GONZALES ISD INFORMATION TECHNOLOGY MANAGEMENT
SCHOOL YEAR 2019–20



Note: PEIMS=Public Education Information Management System.

Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

The network technician joined the Gonzales ISD Technology Department in November 2019. The position oversees the network, maintains equipment, assists the director of technology with writing the disaster recovery and technology emergency operations plan, documents procedures, and resolves work orders. The district systems integrator manages the district's system interfaces and resolves high-level work orders. He has been employed at the district for more than 13 years. The district support staff has been employed at the district since school year 2007-08. This position resolves high-level work orders and trains the district technician. The district technician, responsible for low-level technology problems, joined the Technology Department in December 2019. The district technician reported having no technical experience when hired. The position's duties include re-imaging computers, work orders, and overseeing the recent inventory of all district technology assets. The Technology Department secretary assigns work orders to staff and provides administrative support.

In addition to Technology Department staff, Gonzales ISD has staff in other departments with duties related to technology. Campus technology support staff, which includes four classroom teachers, two paraprofessionals, and one district librarian, provide supplemental technology assistance. Each campus has one campus technology support staff, except for Gonzales High School, which has two. The campus technology support staff assist with low-level technical

problems in their spare time and receive a stipend of \$50 per month. All provide support when they have ime available outside their classrooms during the day. Some respond to user requests during their lunch hours, others respond during their office hours, and one has a window of availability after the last class period of the day. Campus technology support perform staff tasks such as connecting printers, replacing overhead light bulbs, and assisting teachers with use of applications or devices.

The district's Public Education Information Management System (PEIMS) coordinator is not assigned to the Technology Department staff and reports to the assistant superintendent. The PEIMS coordinator oversees the collection, integration, and formatting of all data required for submission to the Texas Education Agency (TEA), in accordance with PEIMS data standards. The PEIMS coordinator's responsibilities include editing and verifying data for accuracy, and distribution of various reports to appropriate staff.

Managing and updating the district's website are responsibilities shared among campus staff, department staff, and individual teachers. The director of public relations updates the district website's home page as needed.

According to the director of technology, Gonzales ISD has a technology committee that includes the director of technology, the superintendent, the chief financial officer (CFO), and staff representatives.

DETAILED FINDINGS

TECHNOLOGY DEPARTMENT STAFFING AND ORGANIZATION (REC. 27)

Gonzales ISD's Technology Department lacks the appropriate staff and organizational structure to provide the most efficient and effective customer support.

The Technology Department uses a free electronic help desk application provided by Spiceworks to manage requests for technology assistance. At the time of the onsite visit, the first step in submitting a work order request was for a teacher or other campus staff to contact campus technology support staff, who would attempt to solve the problem. If unsuccessful, the support staff would route the issue to the Technology Department either by contacting Technology Department staff directly or submitting a work order. District staff are not permitted to submit a work order directly to the Technology Department. Upon receiving the work orders, the director of technology and the Technology Department secretary assign them to Technology Department staff. According to the director of technology, Technology Department staff do not follow a formal process to assign work orders. Instead, they operate through an informal understanding in which Technology Department staff receive work orders based on the technical knowledge and experience of each with regard to the technical issue in question.

According to the director of technology, the department does not document, report, or analyze work orders for trends, although the Spiceworks application that manages work orders can generate statistical reports. Instead of using reports and available data to assess work order progress, the director of technology holds daily department meetings with staff. **Figure 6–2** shows the form completed by all Technology Department staff before the daily department meetings. Staff share their forms with the team, and the department secretary files the forms after the meeting.

During onsite interviews, district staff reported a negative impression of the Technology Department, including that the technology staff mentioned they were overwhelmed with work, and that district staff often submit multiple support requests before receiving technology support.

District staff reported that they often help each other instead of submitting a work order to the Technology Department because, typically, Technology Department staff respond too slowly. District staff expressed frustration with the requirement to approach the campus technology support staff rather than submit a work order directly to the Technology Department,

FIGURE 6–2 GONZALES ISD TECHNOLOGY DEPARTMENT MORNING MEETING DOCUMENT, SCHOOL YEAR 2019–20

Employee:	
What I did yesterday	
What I'm doing today	
Important findings that everyone needs	s to know about
Work Status	
Open	
Purchases that need to be made	
Dates of importance	

noting that the campus technology support staff do not have the time or expertise to solve many issues.

Technology Department staff expressed frustration with the volume of technical support needs from the campuses and requests to support technology equipment and programs they did not approve for use in the district. Technology Department staff said that, despite their best efforts, they perceived a general lack of respect among campus staff for the department. The technology staff reported that they work late hours and some weekends to complete all work orders. Both the Technology Department support staff and campus staff reported a lack of communication and sense of frustration.

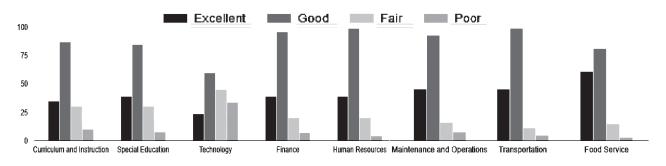
The district has an inefficient method for handling support requests and managing the help desk system. The director of

FIGURE 6–3 GONZALES ISD CULTURE SURVEY, SCHOOL YEAR 2018–19

Gonzales ISD Culture Survey – Let's make GISD better!

SECTION 2

SECTION 2 -The following Central Office Departments are accessible and helpful:



Source: Gonzales ISD, school year 2018-19.

technology and experienced Technology Department staff often handle simple technical tasks, which diverts them from performing more critical infrastructure improvements and strategic planning tasks in support of the district's priorities. The director of technology and the experienced technology staff provide technical support and do not focus on how to improve the network's performance and security, increase the quality of technical services, or forecasting technical equipment needs. The director of technology provided job descriptions for technology assistant I, assistant II, network administrator, technology curriculum coordinator, and coordinator of instructional technology career and technical education; however, those job descriptions did not fully align with the current positions and responsibilities. During interviews, technology staff reported that they had not seen updated, accurate job descriptions for their positions. The Technology Department did not provide a description of technology job duties expected from the campus technology support staff.

Gonzales ISD conducted a culture survey during school year 2018–19, in which district and campus staff ranked departments as excellent, good, fair, or poor. **Figure 6–3** shows results of the culture survey conducted by Gonzales ISD of district staff. Respondents ranked the Technology

Department lowest among all the district departments regarding accessibility and helpfulness.

Respondents were asked to provide additional feedback if they rated departments fair or poor. One respondent stated, "Technology is spotty, and when you do reach them, you don't get a friendly response, if you get help at all."

Gonzales ISD's Board of Trustees (board) Policy AE (LOCAL) includes the "optimal use of technology, seamlessly integrated" as a part of its mission statement. In its school year 2019-20 Campus Improvement Plan (CIP), Gonzales Elementary School identifies the goal of increasing technology use and implementation for teachers and students to support instruction, but notes that the Technology Department cannot support the programs and staff. The Gonzales East Avenue Primary School's school year 2019–20 CIP contains a strategy to increase opportunities for the integration of technology into the classroom instruction processes. In its school year 2019-20 CIP, Gonzales Primary Academy identifies maintaining proficiency in instructional technology by students, faculty, and staff as a problem. Despite the district's goal of to implement and support instructional technology, staff report that no clearly defined technology staff position is responsible for identifying innovative technology tools, integrating them into the

FIGURE 6–4
GONZALES ISD DISTRICT AND CAMPUS STAFF INFORMATION TECHNOLOGY MANAGEMENT SURVEY RESULTS
JANUARY 2020

RESPONDENTS	AGREE	DISAGREE	NO OPINION/DO NOT KNOW
Students have regular acces	ss to adequate computer equipmen	nt, software, and Internet in	the classroom, labs, or library.
District staff	51.6%	35.5%	12.9%
Campus staff	47.3%	45.5%	7.3%
The district meets student n	eeds in fundamental and advance	d computer skills.	
District staff	32.3%	41.9%	25.8%
Campus staff	37.3%	45.5%	17.3%
` '	rounding. cluded due to low participation. ard School Performance Review Team,	January 2020.	

curriculum, and training campus staff to use these tools in the classroom.

Figure 6–4 shows the responses of Gonzales ISD district and campus staff to questions about technology management that appeared in a survey conducted by the review team. A significant number of staff reported that students do not have regular access to technology and have not received instruction from the district in fundamental or advanced computer skills.

The use of instructional technology in the classroom enhances the teaching process and helps students learn how to function in technologically advanced industries and society. Regardless of career choice, all students need instruction to incorporate technology into their daily activities. A curriculum that incorporates technology expands content and helps students reach their full potential. School districts' current education systems provide instruction to encourage using upcoming technology. Effective teachers must be adequately trained and comfortable with the use of the instructional technology tools for integration into the curriculum.

During onsite interviews, teaching staff reported that they did not receive enough support from the Technology Department on integrating technology in their teaching, even though this is a criterion for their performance evaluations. Teachers reported that they learn how to integrate technology from each other and from peers outside the district, but not from the Technology Department staff, whose support is limited to fixing equipment and system issues. Instructional officers for the district have supported teachers with some instructional technology integration assistance, but it is not part of their job description or official duties.

In addition to not receiving professional development support in this area, many teachers said they felt that their instructional spaces are not configured for optimal use of technology. District staff said that teachers are not using many technology assets, such as interactive whiteboards, to support student learning because they have not been trained by technology staff on their use, or how to integrate them into lessons. Some staff reported that even if they knew how to use and integrate technology assets into the curriculum, they often had difficulty connecting to the district's wireless network. Without specialized instructional technology staff to support the integration of technology into the curriculum, the district risks not using technology assets fully to improve student academic outcomes.

At the district's request, the Texas Association of School Business Officials (TASBO) performed a technology review of Gonzales ISD and published the results in October 2019. The reviewing committee interviewed appropriate staff and obtained data, records, and documentation pertaining to the district's information technology function. The review commended certain department practices and contained recommendations for more efficient performance.

The TASBO review commended Gonzales ISD for configuring its wired network to meet the needs of the district, the cordiality of Gonzales ISD staff, and the overtime hours that Technology Department staff have performed to maintain technology support.

The TASBO review identified several staffing and organization weaknesses in the Technology Department. One key observation concerns a lack of instructional technology staff and the resulting lack of technology integration by teachers in the classroom. The report recommended that the district develop a new technology

FIGURE 6-5

position for a districtwide instructional technology specialist to assist teachers in integrating technology into the curriculum. Onsite interviews conducted by the LBB's School Performance Review Team corroborated this need, and multiple staff interviews supported the TASBO recommendation. TASBO reviewers found that the Gonzales ISD Technology Department was understaffed. In addition to adding a new position for instructional technology, the TASBO report recommended a full-time technician for multimedia items. The Technology Department's response to the TASBO review stated its agreement with TASBO's findings and recommended adding an instructional technology position and two technology staff to district leadership.

School districts often use available staffing formulas to determine the appropriate staffing level for their technology departments. The Texas School Technology and Readiness (STaR) Chart, published by TEA, is a tool provided for use in technology planning, budgeting for resources, and evaluation of progress in local technology projects. The STaR Chart shows standards for technology staffing based on student-to-device ratios. The types of devices for this standard include desktop, laptop, and mobile devices.

The Technology Department completed an inventory of technology assets in January 2020 and provided a list of 5,243 technology assets to the School Performance Review Team. Of that total, 2,728 are considered educational technology devices, including 1,416 tablets, 948 desktop computers, and 364 laptop computers. Gonzales ISD had a total enrollment of 2,859 students in school year 2018-19. Therefore, the ratio of available technology in accordance with STaR Chart guidelines for Gonzales ISD is slightly less than one per student. The STaR Chart recommends at least one technical staff to 350 computers. For the number of devices currently available at Gonzales ISD, that recommendation would be seven technical staff. Gonzales ISD currently has three full time technology staff who deal primarily with technical support: the district technician, district support technician, and district systems integrator. According to STaR Chart recommendations, Gonzales ISD does not have the recommended number of Technology Department support staff for the number of educational technology devices.

Effective school districts typically use clerical staff with basic technology skills to handle low-level support as a help desk function. The help desk serves as the central point of contact for support requests to the district's technology function. According to their skill levels, campus office staff often handle simple support calls such as user identification names and password

JARRELL ISD HELP DESK PROCESS GUIDE, MAY 2020 JISD Help Desk Process Have you checked the: Power Source, Cables, and rebooted the device? 1 If Yes, you can: Enter a work order via Eduphoria OR Send an email to helpdesk@jarrellisd.org OR Dial Ext 1901 Priority Level 1: Widespread Network or Phone Outage. Resolution Time - ASAP Priority 2: Failed Hard Drive, Broken Monitor Lockups and Broken Phone. Resolution Time - 1 to 2 hours Priority 3 - Printers, Sync Problems, PC Noise. Resolution Time - Same Day Priority 4: Workstation Install, Software & Hardware. Resolution Time 1-3 Days Priority 5: Office Moves, Loaners, Scheduled Events. Resolution Time - 3-4 Days We are here to provide great customer service. Critical issues will be addressed first. Please do not stop staff in the hallway 10 They are trying to help someone else. Source: Jarrell ISD (JISD), May 2020.

resets, setup of new users, and proper use of desktop products. For more complex technical problems, effective school districts ask users to identify their problem by urgency. Jarrell ISD's technology help desk procedures are an example of a best practice. **Figure 6–5** shows the checklist that Jarrell ISD's help desk provides users to identify the urgency levels of their issue.

The Gonzales ISD Technology Department should reorganize and supplement technology staffing to provide efficient coordination of technology use and effective technology support districtwide.

The director of technology should analyze the number of devices that require support throughout the district to determine if they meet industry-staffing guidelines. Using one of the best practice formulas, the district should develop a methodology to justify and staff the Technology Department to meet the district's technology needs. The director of technology should collaborate with the superintendent and chief human resource officer (CHRO) to establish a methodology to determine appropriate staffing needs. If the district develops additional technical support staff positions, the director of technology should ensure that job descriptions with clear requirements in formal technology education and relevant experience are included.

The director of technology should assess whether the campus technology support positions are the best way to assist campuses with technology concerns. For example, training campus administrative staff in basic support tasks, such as log-on identifications and password resets, could be more effective than logging help desk tickets for Technology Department staff assistance. The director of technology should consider if Technology Department staff could be reorganized to provide support to specific campuses to improve efficiency.

To improve the Technology Department's help desk function, the director of technology should require that district staff specifically identify their technology problems so that Technology Department staff can prioritize these issues and choose work orders based on their expertise and the nature of the requests. This prioritization would enable the director of technology to focus on director-level duties, including strategic planning, analysis of district needs, and administration of the technology budget, with the support of the Technology Department secretary. Technology Department staff should be able to complete work orders or reassign them to a higher level at their discretion. The director of technology should develop a method to solicit and collect data from district staff relating to customer service. Instead of requiring staff to complete forms on their work products for review at daily all-staff meetings, the director of technology should use the help desk program's report features to analyze the number of tickets open, closed, and in progress and discuss any concerns with individual staff. The director of technology could schedule a weekly or twice monthly staff

meeting to review high-level department concerns and customer service comments from district staff. Eliminating daily staff meetings and paperwork would enable technology staff to focus on resolving work orders and improving customer service, and would relieve the secretary of extra filing duties.

The director of technology, superintendent, assistant superintendent, and CHRO should collaborate to develop an instructional technology coordinator position with responsibility for technology training and integration of technology into the curriculum. This position should develop and maintain a quality program for computer instruction for students from kindergarten to grade 12, assist instructional staff with integrating technology into all educational programs, and lead the development of the district's long-range plan for instructional technology. The instructional technology position expectations should include formal education and experience in operating instructional networks, using technology for instructional purposes, and integrating new technologies into the curriculum. The instructional technology position would:

- advise campuses regarding effective strategies and helpful educational resources;
- · advise on classroom uses of technology;
- advise on organizing learning spaces to optimize the use of technology;
- · coordinate districtwide teacher training;
- implement various technology standards at campuses;
- collaborate on network implementation efforts to ensure that the district's network capacity can support instructional needs;
- monitor the adequacy of district technology support; and
- · acquire instructional software for campuses.

The fiscal impact assumes a cost of \$59,609 to hire an instructional technology specialist for the Technology Department, according to the industry average salary. The additional 20.0 percent cost of annual benefits would bring the total cost for the position to \$71,531 (salary of \$59,609 + benefits of \$11,922).

Since the review team's onsite visit, the district reports that it eliminated the director of technology position and hired a chief technology officer and an instructional technology specialist. The district eliminated the seven campus technology support positions, and added three district and campus support staff. The district has established a 1:1 computer program for students and has allowed all staff, students, and parents to submit a work order online. Since the time of the review, the district states that it uses work order software to monitor work orders and trends and has discontinued departmental daily meetings and notes.

TECHNOLOGY PLANNING (REC. 28)

Gonzales ISD does not follow a comprehensive technology planning process based on identified needs and goals.

School districts develop technology plans to assess and evaluate their technology status; determine areas of need; set goals, objects and strategies to meet those needs; and estimate the cost of achieving district objectives. Gonzales ISD's five-year technology development plan for school years 2018–19 to 2021–22 includes the following strategic priorities:

- security and cybersecurity;
- professional development learning through internal and external sources;
- infrastructure- internal connections:
- hardware fiscal sustainability equipment;
- software fiscally responsible software; and
- resource management department partnerships.

The director of technology developed the technology plan during school year 2018–19 with no input from the technology committee. During interviews, district staff reported that they did not know when or if, the technology committee had met during school year 2019–20. A review of board minutes for school year 2019–20 shows no updates or presentation by the technology committee of technology goals, objectives, or strategies. The director of technology said that she meets with subcommittees of the technology committee, but did not provide minutes or membership roles for the subcommittees.

TEA recommends the following components in an effective technology plan:

- · a needs assessment;
- · goals, objectives, and strategies; and
- a budget.

A needs assessment is a process that enables a district to determine the elements in place for the use of technology and to identify unmet technology needs that must be implemented. Gonzales ISD does not have a current needs assessment that would allow the district to assess its overall technology needs.

The next step in successful technology planning is developing goals, objectives, and strategies that meet the district's needs identified in the assessment. For each priority, Gonzales ISD's technology plan lists one goal and several objectives; however, the technology plan does not include a detailed timeline for accomplishing priorities, the staff that will address them, and the metrics that the district will use to determine whether the priorities have been met. Without this information, the district does not have the foundation for effective planning and decision making to achieve its technology goals.

Effective technology planning also involves allocating funds to meet the district's established goals and objectives. Successful technology departments develop a budgeting process that establishes a distinctive budget model and guidelines for district technology spending. The director of technology completes budget worksheets for the Technology Department at the end of the calendar year for the following school year. Technology Department budget allocations are based on historical funding, not on any long-term department goals or formal assessment of the district's technology needs. According to the CFO, the Technology Department does not have a long-range plan for replacing equipment or budgeting for new equipment. Without a formal process for effectively and efficiently determining when to replace technology equipment, the district relies on the director of technology's individual judgment.

Effective school districts develop technology plans that include goals, action plans, timelines, performance measures, success factors, and financial requirements and allocations. These plans designate staff responsible for specific goals or strategies and for managing their implementation. Other Texas school districts, such as Canutillo ISD, Florence ISD, and Magnolia ISD, publish their technology plans on their websites. These districts have produced plans that contain the TEA-recommended components, including an introduction, needs assessment, goals, objectives, strategies, budget, evaluation, and appendices. Katy ISD has formalized its needs assessment process by conducting an extensive technology assessment for each campus and administrative

FIGURE 6–6
KEY COMPONENTS OF BOERNE ISD'S LONG-RANGE TECHNOLOGY PLAN COMPARED TO GONZALES ISD
MAY 2018

BOERNE ISD	GONZALES ISD
District profile: includes district statistics such as number of campuses, students, technology budget, and technology infrastructure	Not included
Executive summary and background information: includes technology planning committee organization, vision and goal statements	Not included
Needs assessment: assessment process and results for what is needed in the district	Not included
Technology infrastructure goals and objectives, including network standards	Included
Instructional technology standards, acquisition process, and usage	Not included
Technology literacy and professional development requirements	Not included
Administrative and business operations technology standards, acquisition process, and usage	Not included
Technology replacement cycles	Not included
Hardware/software standards and acquisition process	Not included
Budget projections and funding sources	Not included
Sources: Legislative Budget Board School Performance Review Team, March 2020; Boerne ISD, May 2018.	

department, using internal and external assessments and aligning the results to district goals and objectives.

Boerne ISD developed an effective, comprehensive technology plan that details the district's needs assessment, use of technology tools, professional development, technology competency and literacy requirements, administrative technology, and replacement cycles. **Figure 6–6** shows key components of Boerne ISD's technology plan compared to Gonzales ISD's technology plan.

Gonzales ISD should develop and implement a comprehensive technology plan.

The district should task the technology committee with expanding the current technology plan. The technology committee should evaluate the district's technology needs and develop a multiyear, long-range technology plan by conducting a needs assessment, setting goals, objectives, and strategies, and establishing a budget.

The district could implement this recommendation with existing resources.

DISTRICT TECHNOLOGY PROCEDURES (REC. 29)

Gonzales ISD's Technology Department lacks documented procedures to guide the implementation of technology support responsibilities.

Before the TASBO review in October 2019, the Technology Department did not have a procedures manual. The TASBO

review recommended that the director of technology collaborate with other technology staff to develop and maintain a complete procedures manual. In response to this recommendation, the director of technology developed the five-page Technology Policies and Procedures Manual, which contains the following sections:

- Gonzales ISD Responsible Use Policy for Technology;
- System Access;
- System User Account Disclaimer;
- Network Etiquette;
- Termination/Revocation of System User Account;
- Vandalism:
- Forgery;
- · Assigned Equipment;
- Device Security;
- · Teacher Laptop;
- E-mail;
- Web Site;
- Facebook;
- Blackboard Mass Media Notifications;
- · Participation in Online Programs/Applications;

- · Classroom Phone;
- · Personal Devices on Our System; and
- · Troubleshooting Technology Issues.

In the district's response to the TASBO review, the director of technology stated that the current manual was the outline for a more thorough procedure manual that would be completed by March 2020. A version of the Gonzales ISD Technology Policies and Procedures Manual in slide show format is on the Gonzales ISD website. The website version of the manual includes information on wireless access, tablet carts, classroom equipment, printing and copying, student use of computers and a list of Technology Department staff.

The existing procedures manual does not include information on the process to conduct an inventory of technology assets, instructions to staff on beginning and end-of-year procedures for technology equipment, how to purchase district assets, work order procedures, or cybersecurity policy or procedures.

Following the TASBO review, Gonzales ISD completed its first inventory of district technology assets in January 2020. The district identified technology assets and organized them by category of equipment, make, model, network identifier, department, Gonzales ISD number, campus and classroom, user type, user name, serial number, purchase date, warranty expiration date, purchase order number, cost, and inactive date. Not all fields were completed for all assets. The total number of technology assets was 5,029. The Technology Department did not use scannable barcodes when tagging the equipment, and has no procedure to update or verify the inventory subsequently. The database used for the technology assets resides with and is maintained by the Technology Department and is not shared with the CFO, Finance Department, or any other district department or staff. The director of technology said that staff perform a "spot check" of district technology assets throughout the year.

End-of-year procedures provided to the LBB review team do not include checking in or reporting of assigned technology equipment to the Technology Department, although the director of technology reported that the technology staff collect technology equipment at the end of the year.

The district does not have procedures for the purchase of technology assets. Interviews with district staff provided conflicting information on the role of the Technology Department in purchasing hardware and software. The director of technology said that district staff purchased software and hardware without departmental approval, and

that purchase orders for technology do not require review from the Technology Department. Other staff reported the assumption that district staff completed "due diligence" by coordinating with the Technology Department before making technology purchases. Technology staff reported that nonstandard technology purchased without their approval or knowledge had caused integration and support problems.

Additionally, district teaching staff can write grant proposals to the Gonzales ISD Education Foundation for technology or media equipment. The grant application process requires Technology Department approval of grants for technology or media equipment. However, the district has no procedures explaining this process or assuring that technology assets purchased with foundation grant funds will be dedicated to the purpose outlined in the proposal. During interviews, for example, teaching staff reported confusion and frustration stemming from an incident in which the Technology Department removed devices purchased with grant funding for a specific purpose and integrated them into the district inventory for general use.

The procedures manual does not provide instructions on how to submit a work order or how to contact the Technology Department for assistance. Neither the procedures manual nor the website informs district staff of whom to contact for problems with district programs, although the Technology Department has a list of district programs with district and campus contacts.

Comprehensive technology procedures have not been provided to district staff. Consequently, district staff learn how the Technology Department will support them through word of mouth and personal experiences with the Technology Department staff. Without documented procedures that set staff expectations and define a department's approach to operations, resource confusion and department inefficiencies can occur. Undocumented procedures also result in added effort and risk to acclimating and training new staff.

Documented procedures assist with streamlining daily operations and troubleshooting nonroutine problems. In addition, written procedures enhance the efficiency and overall effectiveness of the technical staff in managing the district's technology-related needs.

Mexia ISD uses a Technology Procedures Manual as a handbook for technology requests, user accounts, guest accounts, technology-purchasing procedures, and supply items. Fabens ISD has posted its standard operating procedures manual on the district website. The manual contains email guidelines, help desk information, asset inventory management guidelines, equipment repurposing guidelines, equipment checkout guidelines, and hardware and software purchasing guidelines. Humble ISD has a technology management plan that provides descriptions of personnel and processes, including its planning process, acquisition review committee, instructional technology, network administration, and network and desktop support.

Gonzales ISD should develop a detailed Technology Department operations manual that governs department operations and activities.

The director of technology, in collaboration with Technology Department staff, should identify technology functions and activities that require procedures, guidelines, or standards. As procedures are developed and approved by the director of technology and the superintendent, the director of technology should distribute them to all Technology Department staff and place them on the district website. The district should review and update all technology procedures annually.

The district could implement this recommendation with existing resources.

Since the time of the review, the district states that it barcoded, scanned, and loaded all information on new technology equipment into a database.

TECHNOLOGY TRAINING (REC. 30)

Gonzales ISD Technology Department staff lack adequate training to support all the technology used in the district.

The district's technology staff are performing as generalists and lack adequate time to receive training for specialized technology tasks. During interviews, technology staff reported that their technology knowledge had been acquired on the job, and that most were self-taught and perform many tasks by trial and error. Some staff said that they do not have the time to attend training or professional development because they are so busy with help desk issues. None of the campus technology support staff has a formal technology education background, nor is technology-related experience required for these positions. The director of technology has experience as a teacher and administrator at Gonzales ISD, but does not have formal training in technology or technology leadership experience.

The director of technology identified the lack of district funds for professional development and training as another barrier to adequate training. The technology staff does not always have the knowledge or experience necessary to perform their assigned responsibilities. This lack of knowledge frequently results in staff having to search for solutions to problems, such as viewing online instructional videos or calling the manufacturers and vendors for free assistance. These extra steps in the process delay the ability of the technology staff to resolve technical problems and require extended working hours. District staff reported that it is common for issues to remain unresolved for considerable lengths of time due to the responding support staff's lack of expertise, which prevents identifying problems or finding solutions in a timely manner. Often, less experienced technology staff require the assistance of more experienced staff, including the director of technology, to resolve even low-level problems. District staff said they view the technology staff overall as not having the technical knowledge or expertise to solve their technology issues.

High-performing school districts' technology departments include a professional development and training plan for staff to remain up-to-date regarding new technology and to continue striving to master existing technology. A professional development and training plan typically consists of clear guidelines for areas of improvement, including goals, rationales, activities, milestones, resources, and a statement of consequences if there is no evidence of growth.

Gonzales ISD's Technology Department leadership should establish and implement a staff development program to deliver necessary training to all technologyrelated support staff.

The director of technology should assess technology staff and campus technology support staff skill sets against the district's support needs and develop professional development and training plans to address deficiencies. The director of technology should coordinate with the Finance Department to establish a training budget to fund the professional development plan. Additionally, the Technology Department should regularly evaluate the progress against the plan to determine needed adjustments to meet the district's technology needs. TASBO offers industry mentorship programs to district finance and operations leadership staff who are new to their positions. The director of technology, who has been in her position for one year, could benefit from this program.

No fiscal impact is assumed until the superintendent and director of technology determine the professional development needed for technology staff.

Since the time of the review, the district reports that all technology staff have technology experience or backgrounds.

ADDITIONAL OBSERVATIONS

During the onsite visit, the review team observed two additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

DISASTER RECOVERY PLANNING AND TESTING

Interviews with Technology Department staff revealed the lack of a disaster recovery planning and formal disaster and backup system testing. Although systems are backed up and hosted by a reputable partner, and technical architecture provides a high level of access to data, no documentation was provided to substantiate results of any systems backup and recovery testing to date. A lack of formal and periodic testing with documented results does not provide assurance that data will be retrievable during a catastrophic system failure, system compromise, or natural disaster. Gonzales ISD should conduct annual systems backup and recovery testing, document testing results, and develop contingency plans as warranted by those results. The district should perform testing more frequently to address any concerns with systems and data integrity.

GUEST WIRELESS NETWORK ACCESS

The Technology Department does not share the password to the guest wireless network with district staff. Only Technology Department staff know the password; therefore, when an individual from outside the district requires access to the network, Technology Department staff must be present to enter the district network password on the individual's computer. This lack of knowledge causes inconvenience when guests visit the district to perform training or work with students and district staff. The district should share the guest wireless network password with campus administrative staff who can communicate it to authorized individuals and update the password as needed to maintain system security.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team identified a fiscal impact for **Recommendation 27** (technology staffing).

RE	COMMENDATION	2020–21	2021–22	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
6. l	NFORMATION TECHNOLOGY MANAGEM	ENT						
27.	Reorganize and supplement technology staffing to provide efficient coordination of technology use and effective technology support districtwide.	(\$71,531)	(\$71,531)	(\$71,531)	(\$71,531)	(\$71,531)	(\$357,655)	\$0
Tota	al	(\$71,531)	(\$71,531)	(\$71,531)	(\$71,531)	(\$71,531)	(\$357,655)	\$0

7. TRANSPORTATION MANAGEMENT

Transportation staff in the Gonzales Independent School District's (ISD) map and serve the bus routes that transport students to and from campuses each day, and coordinate transportation for athletics and extracurricular trips. The district's Transportation staff in the Operations Department maintain and repair school buses and general service vehicles.

During school year 2019–20, the district operated 18 routes, including 15 regular program routes and three special program routes, and maintained a fleet of 35 school buses. During school year 2018–19, the district's average daily ridership was 1,034 students.

ACCOMPLISHMENTS

- ♦ Gonzales ISD assigns extra trips to drivers using an equitable and transparent method.
- ♦ Gonzales ISD encourages coaching staff to maintain commercial driver licenses, reducing transportation staffing costs for extracurricular trips.

FINDINGS

- ♦ Gonzales ISD lacks performance metrics to guide the management of its Transportation function.
- Gonzales ISD does not optimize its bus routes and schedules.
- ♦ Gonzales ISD relies on manual, paper-based processes for transportation operations and record keeping.
- ♦ Gonzales ISD lacks formal guidelines for bus replacement and surplus asset sales, contributing to bus inventory that exceeds its transportation needs.

RECOMMENDATIONS

- ♦ Recommendation 31: Develop and report regularly on transportation performance metrics.
- ♦ Recommendation 32: Evaluate bus routes and schedules, fully implement the district's transportation software, and schedule periodic reviews and updates.
- ♦ Recommendation 33: Utilize transportation technology effectively to minimize administration, enable analytics, and improve operations.

♦ Recommendation 34: Develop a formal bus replacement plan and procedures for the timely sale of surplus buses.

BACKGROUND

An independent school district's transportation function transports students to and from school and other school-related activities. This function is regulated by federal and state laws related to funding, vehicle type, driver education, and safety issues. Districts implement these regulations, budget and allocate resources, and establish operational procedures for bell schedules, bus routes, and transportation fleet maintenance.

Managing transportation operations is dependent on the organizational structure of the district. Districts either may contract for or self-manage their transportation operations. Using a contracted management model, districts rely on the company to provide supervision of its transportation operation. In this arrangement, a district may rely on the company to provide all or some staff, or it may use district staff for its operations. Using the self-management model, a district manages transportation functions without assistance from an outside entity. Managing transportation operations requires planning; state reporting and funding; training and safety; and vehicle maintenance and procurement. Primary transportation expenditures include capital investments in vehicle fleets and annual costs of maintenance and operations.

Gonzales ISD self-manages its transportation operations. The transportation coordinator, who reports to the director of operations, supervises 18 bus drivers, eight bus monitors for special program routes, and two mechanics. The district also budgets for a transportation assistant position, which was vacant at the time of the onsite visit.

Figure 7–1 shows the reporting structure for the transportation function in the Operations Department.

Figure 7–2 shows the key measures of peer districts' transportation services compared to Gonzales ISD. Peer districts are districts similar in size and other characteristics to Gonzales ISD that are used for comparison purposes. The peer districts for Gonzales ISD are Calhoun County, Castleberry, and Tuloso-Midway ISDs. **Figure 7–2** shows that Gonzales ISD is more efficient than its peers in cost per

student rider, annual cost per bus, and cost per mile for special program transportation. Gonzales ISD's cost per student rider is \$897, which is less than the peer district average of \$1,076. School Transportation Operations report data were not available for Castleberry ISD for school year 2018-19, so the district was excluded from peer district analysis.

Local and state transportation sources fund the Gonzales ISD school transportation program. To receive state funding, Gonzales ISD annually submits the School Transportation Route Services Report and School Transportation Operations Report to TEA. Information in these reports is applied to a state formula that generates an annual allocation of state funds.

DETAILED ACCOMPLISHMENTS

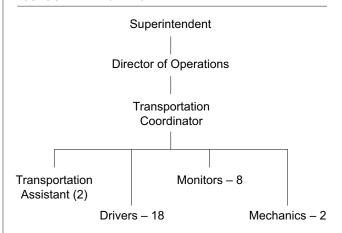
EXTRA SHIFT ASSIGNMENTS

Gonzales ISD assigns extra trips to drivers using an equitable and transparent method.

The transportation coordinator posts notifications for upcoming extra duty pay opportunities, such as field trips and other extracurricular activities, on a central notice board. After drivers and monitors have an opportunity to sign up for the shift, the transportation coordinator writes the staff names on paper and draws one at random in front of the staff.

Drivers reported preferring this process to the previous method for assigning extra shifts, which lacked transparency

FIGURE 7-1 **GONZALES ISD OPERATIONS DEPARTMENT ORGANIZATION (1)** SCHOOL YEAR 2019-20



Notes:

- Figure shows the transportation function of the Operations (1) Department.
- The transportation assistant position was vacant at the time of the review team's onsite visit.

Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

and lowered driver morale because of a sense that shifts were not assigned equitably.

EXTRACURRICULAR COST REDUCTION

Gonzales ISD encourages coaching staff to maintain commercial driver licenses, reducing transportation staffing costs for extracurricular trips.

FIGURE 7-2 **GONZALES ISD TRANSPORTATION OPERATING DATA COMPARED TO PEER DISTRICTS** SCHOOL YEAR 2018-19

	TOTAL	TOTAL		COST PER	ANNUAL COST	COST P	ER MILE	AVERAGE
DISTRICT	OPERATIONS COSTS	SCHOOL BUSES	HOME-TO-SCHOOL STUDENT RIDERS	STUDENT RIDER	PER BUS BASED ON TOTAL BUSES	REGULAR PROGRAM	SPECIAL PROGRAM	STUDENTS PER BUS
Gonzales ISD	\$927,858	33	1,034	\$897	\$28,117	\$3.86	\$2.00	31.3
Calhoun County ISD	\$1,312,387	44	1,151	\$1,140	\$29,827	\$2.95	\$2.14	26.2
Tuloso- Midway ISD	\$1,283,748	39	1,261	\$1,018	\$32,917	\$5.68	\$5.70	32.3
Peer district average	\$1,298,068	42	1,206	\$1,076	\$30,906	\$4.32	\$3.92	28.7
Greater (less) than peer district average	(\$370,210)	(9)	(172)	(\$179)	(\$2,789)	(\$0.46)	(\$1.92)	2.6

SOURCE: Texas Education Agency, School Transportation Operations and School Transportation Route Services Reports, school year 2018–19.

In lieu of scheduling district bus drivers, coaches drive the buses that transport student athletes to extracurricular events. Coaches receive a stipend of \$15 per trip up to 150 miles and \$0.10 for each additional mile, paid from athletic funds. This practice enables the district to maintain lower operating costs than the peer district average.

The athletic director includes holding a commercial driver licenses (CDL) as a recommended qualification for new coaching positions, and the majority of current coaching staff maintain CDLs. Transportation staff track that coaches meet all annual requirements to maintain these licenses, and all commercially licensed staff who drive students, including coaches, must participate in the district's random drug and alcohol screening process.

DETAILED FINDINGS

PERFORMANCE METRICS (REC. 31)

Gonzales ISD lacks performance metrics to guide the management of its Transportation function.

The district has experienced great turnover in Transportation leadership during the past three years. Gonzales ISD began school year 2019–20 with a new transportation coordinator and transportation assistant. The succession plan for Transportation involved the experienced coordinator providing training and mentoring to the transportation assistant. However, the transportation coordinator left the district for another position, and the transportation assistant assumed the coordinator position midyear. At the time of the onsite visit, the assistant position from which the current coordinator had been promoted remained vacant. No procedures or expectations based on performance metrics exist for the transportation coordinator position to guide management processes and decision making.

The director of operations has regular meetings with the superintendent to provide updates on facilities and transportation issues. Neither the director of operations nor the transportation coordinator develops periodic management reports with metrics or standardized reporting elements.

Additionally, the district does not maintain consistent, accurately documented transportation data across the organization. For example, the district's bus inventory data sources, including the depreciation schedule, inspection schedule, and bus routes, show inconsistent counts and use of vehicle identification numbers.

A performance measurement system identifies a series of measurable goals and objectives. An organization establishes a desired goal or benchmark for each measurement based on industry standards and peer data, then documents its data and compares it to the benchmarks.

Gonzales ISD does not use industry benchmarks to assess the Transportation function's effectiveness. **Figure 7–3** shows transportation best practices used in other districts or noted in transportation research.

In the absence of accurate tracking and reporting of performance metrics, the Transportation function may not operating as efficiently as possible. Gonzales ISD's lack of tracking performance measures makes it difficult to ensure that students are transported safely and by the most efficient and effective means.

Incorporating performance metrics into transportation operations enables districts to determine the effectiveness of the transportation operations function. Data from the performance metrics is used by effective districts to make data-driven decisions supported by objective evidence.

Gonzales ISD should develop and report regularly on transportation performance metrics.

The transportation coordinator and the director of operations should develop the initial set of performance metrics to measure the effectiveness and efficiency of the Transportation function, and then communicate them to all stakeholders.

The director of operations should develop a management report with performance metrics that provide a consistent update for the superintendent on weekly operations, including items such as employee absences, use of substitute drivers, accidents, preventive maintenance updates, bus scheduling, and complaints and resolutions.

Figure 7–4 shows critical areas that the district should consider including in a tracking system for performance metrics.

The transportation coordinator should compare actual performance against the selected benchmarks to determine where improvements are needed. The transportation coordinator regularly should report performance information, including goals and areas for improvement, to the director of operations and the superintendent. After the initial set of performance metrics are established, the transportation coordinator should communicate them to all stakeholders.

FIGURE 7-3 TRANSPORTATION INDUSTRY BEST PRACTICES, CALENDAR YEAR 2020

GOAL	MEASURE
Preventable accidents	1:100,000 miles
On-time performance	99.5% (includes all services)
Routing utilization efficiency	80.0% of available time or available capacity
Runs per bus (morning)	2.3 to 2.5 (triple-tiered system); 1.6 to 1.9 (double-tiered system)
Bus-to-mechanic ratio	25:1 to 30:1 (depends on fleet type and age)
Spare bus ratio	12.0% to 15.0% (depends on fleet mix and trip volume)
Driver turnover rate	Less than 15.0%
Parts cost per mile (without labor)	\$0.16 to \$0.18 (depends on fleet type and age)
Maintenance cost per mile (parts, supplies, and labor)	\$0.39 to \$0.43 (depends on fleet type and age and assumes 13,000 miles per bus per year)
Fleet miles per gallon (mpg)	6.0 mpg to 7.0 mpg (depends on fleet combination, type, age)
Driver labor percentage of operating costs	39.0% to 43.0% (excluding benefits and workers' compensation)
Total labor percentage of operating costs	54.0% to 61.0% (excluding benefits and workers' compensation)
Insurance and risk percentage of cost	5.0% to 10.0% (excluding workers' compensation)
Annual cost per bus operated	\$30,000 to \$50,000 per bus (no capital cost)
Special education services	
Percentage of pupils transported	5.0% to 10.0%
Percentage of service time	20.0% to 40.0%
Percentage of total system costs	30.0% to 50.0%
Fleet useful life	10,000 miles to 15,000 miles per year – 180,000 miles maximum; 10 years to 12 years; spare vehicles, 11 years to 13 years

SOURCES: Legislative Budget Board School Performance Review Team, March 2020; Council of the Great City Schools, 2010; American School and University Magazine, 2005; and National Association of State Directors of Pupil Transportation, 2010.

The district should seek opportunities to analyze performance periodically and to report on operating activities.

The director of operations and transportation coordinator should develop guidelines for transportation data collection and tracking, including the consistent use of vehicle identification numbers.

This recommendation could be implemented with existing resources. More efficient operations could result in lower transportation costs, but the fiscal impact cannot be determined.

ROUTING (REC. 32)

Gonzales ISD does not optimize its bus routes and schedules.

The district operates 15 regular program bus routes and three special program bus routes that travel approximately 1,205 miles per day. The regular program bus routes include four town routes and 11 county routes. The special program bus routes cover the entire district.

FIGURE 7-4 **GONZALES ISD CRITICAL TRANSPORTATION MEASUREMENTS, MARCH 2020**

MEASURE	COMPONENT
Cost efficiency	Cost per mile
	Cost per bus
	Cost per student
Cost-effectiveness	On-time performance
	Spare bus ratio
	Driver absentee rate
	Average student occupancy rate
Safety	Accidents per 100,000 miles
	Student behavior incidents per month
Maintenance	On-time preventive maintenance inspections
	Bus fleet miles per gallon (diesel)
	Miles between road calls (reactive maintenance)
	Maintenance cost per bus (annual report)
Source: Legislative I	Budget Board School Performance Review

Team, March 2020.

FIGURE 7–5
GONZALES ISD TRANSPORTATION ROUTE OPERATION
SCHOOL YEAR 2019–20

ROUTE TYPE	AVERAGE MORNING DURATION	AVERAGE AFTERNOON DURATION	AVERAGE TOTAL DAILY MILEAGE	AVERAGE ESTIMATED MILES PER GALLON
County routes	2 hours and 18 minutes	2 hours and 24 minutes	85.5	16.5
Town routes	1 hour and 31 minutes	2 hours	25.8	12.7
Special program routes	2 hours and 7 minutes	2 hours and 16 minutes	67.3	17.1
Sources: Legislative Budget	Board School Performance Rev	iew Team; Gonzales ISD, March	2020.	

Figure 7–5 shows Gonzales ISD transportation route operation information for school year 2019–20 by type of route.

The district's county routes operate on a single-tier model and span distances from the center of town to the outskirts of the district's boundaries. Considering the long drive times for the rural county routes, drivers typically run one route each and board students from all grades on the same bus. The district's town routes cover shorter distances and typically operate on a double-tier model, making a second trip to board and transport students to campuses.

The district transports students to campuses from 7:15 AM to 7:45 AM. Those routes with 7:15 AM arrivals are the first dropoff locations for town routes that make double runs. The average route takes two hours and seven minutes in the morning and two hours and 15 minutes in the afternoon. Due to the long route times, the district transports all grade levels on the same route for delivery to each of the schools at approximately the same time, with bell schedules staggered by approximately five minutes to enable the buses to travel between nearby campuses. Students are seated by age group, with the youngest students riding in the front of the bus and oldest students in the back. The district does not have board policies or procedures that establish a maximum ride time for students.

The district's bus routes are well-established, and transportation route planners typically make only minor adjustments to routes as needed, such as deleting or adding stops for students transferring into or out of the district. Previous district leadership commissioned a transportation study, but district staff reported that the results of the study to revise routes were not implemented.

The district purchased a transportation software program during school year 2019–20. Although the district's transportation software package has route optimization features, neither the transportation coordinator nor the

director of operations utilizes this available resource to evaluate the efficiency of routes, optimize routes, or plan route changes for the upcoming school year. The software's underlying system data contains some errors or inconsistencies in student coding observed by the review team, limiting the district's ability to use key software features to improve transportation planning.

Without a periodic review of the routing network and the ability to overlay route paths onto roadway maps, it is difficult for the district to visualize potential opportunities for improvements in the routing network. The district's lack of a regular review and optimization process for routing and scheduling leaves it unable to evaluate whether it is providing the safest, most effective transportation services to students and optimizing the use of district funds.

The current routes do not enable the transportation of elementary and secondary students on separate buses. Without policies and procedures to limit maximum ride time or to separate students by grade level, the district may fail to protect students from risks or excessive time on the bus each day. It is more developmentally appropriate for younger students to ride separately from older students.

The *Idaho School Transportation Best Practices*, published by the Idaho State Department of Education and revised in January 2018, notes that "routing is probably the single most important factor in establishing an effective, cost-efficient, and safe district student transportation system." Effective districts routinely evaluate the efficiency of their routes and schedules and fully utilize the capacity of technology, such as routing software, to optimize routes.

Austwell-Tivoli ISD implemented an effective process for managing bus routes. The district evaluates and compares the mileage of each route annually, with a focus on removing stops that are no longer necessary. Trinity ISD has also developed an effective process when it revised its routing scheme to combine its out-of-town and in-town routes,

which eliminated four bus routes, reducing operating, maintenance, and capital costs.

Many districts use an electronic system to develop efficient bus routes. However, other districts use online applications for mapping and common productivity programs for producing spreadsheets and documents to improve run paths and reduce manual processes.

The *National School Transportation Specifications and Procedures*, adopted by the National Congress on School Transportation, is an excellent resource for the route planning process. Its recommendations include the following elements:

- determining planning policies or guidelines, including eligibility and walk distances;
- developing routing strategies to increase efficiency or improve service levels, including feeder or transfer routes; and
- conducting periodic evaluations of route data to ensure that each of the routes are planned to meet the specific goals or parameters of the school district.

Gonzales ISD should evaluate bus routes and schedules, fully implement the district's transportation software, and schedule periodic reviews and updates.

The district should evaluate whether the implementation of staggered bell times will help accomplish the following goals: (1) enable a reduction in the number of drivers needed; (2) eliminate the need for double bus runs; (3) reduce the number of buses required; (4) enable students to ride with peers of their own age; and (5) shorten ride times for students.

The district should fully implement routing software including data cleanup, properly coding the student information and route characteristics, ensuring proper training for staff, and planning the most efficient routes for the district. The district should upload relevant results of the previous transportation study to the district's transportation software program to further enable analysis and mapping of efficient routes. The transportation coordinator should develop a schedule for recurring evaluations of the routes and schedules.

The superintendent, director of operations, and transportation coordinator should develop a policy and procedures to establish district guidelines for maximum student ride times. The superintendent should submit the policy to the Gonzales ISD Board of Trustees for approval.

Since the time of the review, the district has implemented a practice of separating elementary and secondary students for in-town routes. For school year 2020–21, Gonzales ISD staggered start times for secondary campuses.

This recommendation could be implemented with existing resources. More efficient routes could result in lower transportation costs, but the fiscal impact cannot be determined.

MANUAL PROCESSES (REC. 34)

Gonzales ISD relies on manual, paper-based processes for transportation operations and record keeping.

The district's head mechanic, a veteran in the industry and the district, maintains primarily paper-based records for maintenance of the district's bus fleet and white fleet. The position's responsibilities include work order management, vehicle maintenance, management of warranties, parts inventories, cost management, mileage tracking, inspection schedules, and preventive maintenance.

The head mechanic methodically develops hard-copy records and maintains them in an organized filing system in the maintenance shop. He updates a systematic log of paper work orders. However, due to the manual nature of the record keeping, the district does not conduct a detailed analysis of transportation work orders.

The district purchased three programs for vehicle maintenance, including standardized technology for vehicle diagnosis. However, the district relies primarily on paper-based systems and has not conducted an historical analysis of vehicle maintenance operations.

When scheduling transportation services for extracurricular events, athletic competitions, or field trips, staff contact the transportation coordinator by email or telephone. The transportation coordinator uses published athletic event calendars to anticipate transportation needs. The district does not use an online scheduling tool or modules within its purchased transportation software to automate the scheduling process.

Manual record keeping can result in inefficient operations and limits access to information for transportation stakeholders. The lack of shared digital information inhibits transportation planning efforts. Data management, which is crucial to transportation planning, includes tracking vehicle repair costs, mileage, and working hours; however, the district's hard-copy data in its current format cannot be

reformatted easily into reports for decision makers with regard to procurement planning, parts inventory, or routing and scheduling.

The paper-based records management system contributes to the district's inability to track and analyze preventive maintenance information and to calculate the life cycle cost for each of its vehicles. Manual tracking of warranty information can be more prone to error, leaving the district at higher risk for unused or voided warranties when vehicles need repair.

The district's use of manual scheduling for trips can reduce efficiency and create obstacles for both staff requesting trips and those scheduling them.

An entry from the *Idaho School Transportation Best Practices* report concerns a district's ability to provide technological and computer support for transportation functions. It recommends that districts maintain databases on many aspects of their transportation operations, including vehicle maintenance histories, fuel disbursements, parts inventories, routing, scheduling, and mapping.

Gonzales ISD should utilize transportation technology effectively to minimize administration, enable analytics, and improve operations.

The director of operations, the transportation coordinator, and the mechanics should document the existing paper-based systems and meet with the director of technology to develop a plan to automate and digitize these systems. The transportation coordinator should collaborate with technology staff, transportation software vendor, and other local districts to build capacity and offer training on relevant technology to transportation staff.

The director of operations and the transportation coordinator should utilize the existing transportation software program to serve as the vehicle management information system. The transportation software should be used to record bus number, parts used, duration of repair, type of maintenance performed, date, mileage, interval of the next service, warranty recovery, diesel fuel dispensed and mileage (for miles per gallon), vendor work (brake jobs outsourced), reactive maintenance, and spare parts inventory.

The district should develop an automated process to schedule transportation services for nonroute trips using existing technology, train the transportation coordinator on the process, and disseminate updated procedures to all staff. The district should seek opportunities to better use information systems to analyze performance on a periodic basis and to report on operating activities, including vehicle maintenance and repairs, fuel usage, warranty schedules, vendor expenses, and inventory.

Since the review team's onsite visit, the district has implemented an electronic bus referral system. District staff report that this system has streamlined the discipline referral process for campus administrators.

This recommendation could be implemented with existing resources.

SURPLUS BUSES (REC. 34)

Gonzales ISD lacks formal guidelines for bus replacement and surplus asset sales, contributing to bus inventory that exceeds its transportation needs.

Figure 7–6 shows the Gonzales ISD school bus inventory for school year 2019–20.

The district owns 35 fleet buses, including three new regular fleet buses and five special education buses. It also owns an additional regular fleet bus that was taken out of service due to a significant accident. The district maintains three police vehicles and a white fleet of seven vehicles, including four activity vans and three large sports utility vehicles. Gonzales ISD reserves several of the newer buses for athletics and extracurricular trips because they are less prone to mechanical failure, and these trips require buses to travel longer distances than a typical route due to the athletic travel demands of the rural area.

The board has adopted a number of transportation-related policies, but the district lacks a policy related to school bus replacement schedules. The district also lacks a formal fleet replacement plan and has not established long-term funding methods for future bus purchases.

District staff reported that some capital investments including the purchase of new buses had been delayed to rebuild the fund balance. The district approved purchases of three new school buses in December 2019. **Figure** 7–7 shows the district's school bus purchases from school years 2017–18 to 2019–20. The district's bus purchasing has been inconsistent. The district purchased multiple buses during two of the three most recent school years, and had not purchased buses since school year 2014–15.

It is common in the school bus industry to target a spare bus ratio of approximately 10.0 percent to 15.0 percent. This standard is calculated using the following equation:

Total bus fleet - Active route buses = Spare total

Spare total ÷ Active route buses = Spare ratio

Calculating by using this formula, Gonzales ISD operates a spare ratio significantly greater than the industry target. However, using percentages to gauge small fleets is not always the most effective measurement.

The district does not use an industry-standard calculation to determine a maximum number of spare buses, but transportation staff reported that the maximum number of surplus fleet vehicles used in a given day is four. At the time of the onsite visit, the district maintained a spare fleet of five buses and had received shipment of three new buses.

The district has limited documentation of procedures related to treatment of surplus transportation assets, and district staff said that no surplus transportation equipment had been sold at auction during the past school year. District staff reported informal plans to sell a damaged school bus secured at its transportation facilities and other spare buses.

An excessive number of spare buses takes up valuable time from the lead mechanic. Attention to these buses takes focus away from the in-service buses and other vehicles, which have a higher priority for service because they fulfill the primary mission of transporting students to and from school.

Without a defined and supported replacement plan, the average and maximum ages of a district's fleet of vehicles may increase. Although interviews with principals and staff indicate a high level of satisfaction with the service provided by transportation staff, maintaining an acceptable level of service is likely to result in increased maintenance costs as the fleet ages. Without planned, regular purchases of buses, the district risks deploying a future fleet with an inconsistent age distribution that may be less reliable in ensuring the ongoing safety, reliability, and efficiency of transportation operations. Older vehicles tend to experience more breakdowns and service disruptions, and they are not equipped with the latest improvements in vehicle technology for safety and efficiency. As the fleet ages, the district will need to increase the proportion of spare vehicles to cover more frequent and longer maintenance and repair activities for vehicles in regular service. Without clear guidelines, the district also risks financial waste through unnecessary or excessive bus purchases and reduced resale value from vehicle disposal.

FIGURE 7–6
GONZALES ISD SCHOOL BUS INVENTORY
SCHOOL YEAR 2019–20

YEAR	AGE (IN YEARS)	BUS STATUS: QUANTITY
2019	New	Route – Regular: 3
2018	1	Route - Special: 1; Trip: 1
2014	5	Trip: 6
2012	7	Route - Regular: 1; Trip: 3
2011	8	Route – Regular: 2
2010	9	Route – Regular: 2
2009	10	Route – Regular: 2
2008	11	Route – Regular: 1
2007	12	Route - Regular: 1; Special: 2
2006	13	Route – Regular: 1
2005	14	Route – Regular: 1
2003	16	Route – Regular: 2
2002	17	Spare: 1
2001	18	Spare: 2
2000	19	Route – Special: 1
1999	20	Spare: 1
1997	22	Spare: 1
Total		35
		Route – Regular: 15Route – Special: 5Trip: 10Spare: 5

NOTE: The district's school bus inventory also includes one 2006 school bus taken out of service due to a significant accident. Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

FIGURE 7–7
GONZALES ISD SCHOOL BUS PURCHASING HISTORY
SCHOOL YEARS 2017–18 TO 2019–20

VEHICLE TYPE	PURCHASE DATE	PURCHASE PRICE
Standard 77-Passenger Bus	March 2020	\$104,036
Standard 77-Passenger Bus	March 2020	\$104,036
Standard 77-Passenger Bus	March 2020	\$104,036
Standard 77-Passenger Bus	April 2018	\$95,604
Special Education Bus	April 2018	\$101,540

SOURCES: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

The district's practice of maintaining a large number of spare buses may result in increased transportation expenses and an unnecessary burden on its mechanics' time, as the district continues to be store, inspect, maintain, and repair spare buses. The district also risks a continued devaluation of transportation assets and lower sale prices if it does not sell surplus inventory within an optimal timeframe.

According to the Council of the Great City Schools, a coalition of the nation's largest urban public school systems, a goal of a well-run transportation department is to procure only the number of buses typically required daily, plus an appropriate spare bus ratio of 10.0 percent to 15.0 percent. Although this standard is flexible based on a system's needs, factors such as district size, offsite parking availability, age of the fleet, and reliability of the fleet can affect the appropriate spare bus ratio for a fleet.

The National Association of State Directors of Pupil Transportation Services, a leading national organization in school transportation, recommends that buses are replaced every eight years to 15 years, depending on the type of bus and level of use. Buses older than age 16 often are not compliant with current regulations and policies. An aging fleet with significant mileage typically has a higher cost of operation, in the form of lower miles per gallon in fuel consumption, more frequent repairs, and higher repair costs.

One method of assessing optimal replacement criteria considers vehicle life cycle costs as a function of increasing maintenance costs and decreasing capital/depreciation costs, or year-over-year change in residual value and accumulated maintenance costs. The point at which the cost of maintenance (annual maintenance costs) exceeds the cost of ownership (annual capital/depreciation costs) represents the recommended replacement age. Continued maintenance and usage of fleet vehicles and equipment past this optimum point increases cumulative life cycle costs.

To assist school districts in the management of their fleets, the Texas Comptroller of Public Accounts published a best practice example for vehicle replacement planning. **Figure 7–8** shows the analytical and budgetary processes that effective districts use when developing replacement plans.

Gonzales ISD should develop a formal bus replacement plan and procedures for the timely sale of surplus buses.

The district should develop a board policy for bus replacement and spare buses based on the vehicle's mileage and age, including guidance on when the district should dispose of a vehicle.

FIGURE 7–8 SAMPLE TEXAS STATE VEHICLE FLEET MANAGEMENT PLAN FOR TEXAS PROCUREMENT AND SUPPLIER SERVICES MARCH 2010

New requirement/replacement analysis

- · Develop replacement criteria
- · Evaluate fleet vehicle use and type
- · Conduct fleet size evaluation
- Develop recommendations for new or replacement vehicles

Budgeting

- Reconcile recommendations with budget
- · Request funds in budget requests
- · Receive authorization to purchase

Acquisition

- Purchase vehicle
- Lease vehicle
- Accept donated vehicle
- Incorporate seized vehicle

Vehicle preparation

- · Receive vehicle
- Register vehicle
- · Prepare or retrofit vehicle
- · Assign vehicle
- Enter vehicle into fleet management system

Fleet operations

- · Vehicle maintenance and repair
- · Warranty service
- Preventive maintenance
- Unscheduled maintenance
- · Roadside assistance
- State vehicle inspection
- Trip logging
- · Retail fuel purchasing
- Bulk fuel purchasing
- Alternative fuels

Fleet management

- Data analysis and reporting
- Vehicle utilization
- Vehicle disposition
- Driver and vehicle safety: qualification, training, certification, accident reporting

Source: Texas Comptroller of Public Accounts, March 2010.

The director of operations and the transportation coordinator should develop the policy in coordination with the superintendent and chief financial officer (CFO) and submit it to the board for consideration. The policy should be data-driven and based on objective criteria such as miles, age of the school bus, and parts used to maintain the serviceability, or a combination of criteria. Following the replacement criteria will help the district to control maintenance costs, streamline the process to maintain a cost-effective school bus fleet, and reduce the average age of the fleet.

Relevant stakeholders, including the director of operations, the transportation coordinator, and the CFO, should develop a long-term bus replacement plan, funding strategies, and detailed procedures for bus replacement and handling of surplus transportation assets. They should submit these drafts to the superintendent for approval, and communicate the finalized plans to the board, staff, and community.

The district should reduce the size of its school bus fleet by selling older and seldom-used vehicles at auction.

The fiscal impact assumes that the district sells four surplus buses and one damaged bus for a \$13,000 onetime gain (4 buses x \$3,000 per bus + 1 bus x \$1,000). Additionally, the fiscal impact assumes an approximate annual savings of \$5,000 (5 buses x \$1,000) due to forgoing the registration, inspection, insurance, and maintenance costs required to keep the buses available for service. The fiscal impact may be

greater or less depending on the sales price for each bus and the actual costs for registering, inspecting, and insuring each bus. The fiscal impact of long-term bus replacement depends on the district's implementation and cannot be determined.

Since the review team's onsite visit, district staff reported that they plan to hold an online auction to sell the damaged bus and other spare buses in November 2020.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should promptly address them. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team identified a fiscal impact for **Recommendation 34** (bus replacement plan).

The School Performance Review Team could not determine a fiscal impact for other recommendations; however, if Gonzales ISD implements **Recommendation 31** (performance metrics), and **Recommendation 32** (routing), the district may achieve savings through increased efficiency and a reduction of costs.

RECOMMENDATION	2020–21	2021–22	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
7. TRANSPORTATION MANAGEMENT							
34. Develop a formal bus replacement plan and procedures for the timely sale of surplus buses.	\$0	\$5,000	\$5,000	\$5,000	\$5,000	\$20,000	\$13,000
Total	\$0	\$5,000	\$5,000	\$5,000	\$5,000	\$20,000	\$13,000

8. SAFETY AND SECURITY MANAGEMENT

Gonzales Independent School District (ISD) has its own Police Department. The police chief oversees the department and reports to the superintendent. The district also has a school resource officer (SRO), who is a sworn law enforcement officer responsible for safety and crime prevention in the district. The SRO works with administrators to maintain a safe environment for students and staff. The SRO position currently is vacant. The director of operations serves as the emergency management coordinator for the district. Figure 8-1 shows the organization of staff responsible for safety and security. For school year 2018-19, the district spent \$206,631 for safety and security operations. Gonzales ISD has an interlocal agreement with Gonzales County, Caldwell County, and the City of Gonzales to support safety and emergency operations in the district.

ACCOMPLISHMENT

♦ Gonzales ISD has trained all district staff in the Stop the Bleed program.

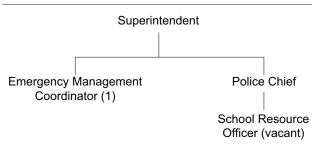
FINDINGS

- Gonzales ISD lacks consolidated safety and security procedures, which contributes to inconsistent district practices to ensure a safe environment for students, staff, and the community.
- ♦ Gonzales ISD staff do not use the district's official mass communication tool consistently to convey news of critical incidents.
- ♦ Gonzales ISD lacks sufficient staffing to provide effective safety and security oversight for the entire district.
- ♦ Gonzales ISD lacks a method to set and implement training goals for district staff.

RECOMMENDATIONS

Recommendation 35: Develop a districtwide operating procedures manual, which consolidates existing procedures while incorporating national standards and best practices, to guide district safety and security operations.

FIGURE 8–1 GONZALES ISD SAFETY AND SECURITY STAFF SCHOOL YEAR 2019–20



Note: (1) The director of operations serves as Emergency Management Coordinator.

SOURCES: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

- ♦ Recommendation 36: Enforce the use of the designated mass communication tool to inform district staff of critical incidents, implement training in its use, and verify that all district staff have installed the application on their wireless telephones.
- ♦ Recommendation 37: Develop a systematic model for calculating the optimum staff size and implement methods to recruit qualified school resource officers to fill department vacancies.
- ♦ Recommendation 38: Assess training needs and ensure that all district staff receive appropriate safety and security training.

BACKGROUND

An independent school district's safety and security function identifies physical and environmental vulnerabilities and includes strategies to minimize risks to ensure a protected learning environment for students and staff. This protection includes a balanced approach of prevention, intervention, enforcement, and recovery. Risks can include environmental disasters, physical hazards, security threats, emergencies, and human-caused crises.

Managing safety and security initiatives is dependent on a district's organizational structure. Larger districts typically have staff dedicated to safety and security, and smaller districts assign staff tasks as a secondary assignment. Safety

FIGURE 8–2
GONZALES ISD DISTRICT STAFF, CAMPUS STAFF, AND PARENTS SAFETY AND SECURITY SURVEY RESULTS
MARCH 2020

DECDONIDENTS	ACREE	DICAODEE	NO ORINION/DO NOT KNOW
RESPONDENTS	AGREE	DISAGREE	NO OPINION/DO NOT KNOV
Students feel safe at school.			
District staff	81.3%	12.5%	6.3%
Campus staff	80.0%	10.9%	9.1%
Parents	54.5%	45.5%	0.0%
Classrooms are safe environment	s for students and teachers.		
District staff	84.4%	9.4%	6.3%
Campus staff	88.1%	9.1%	2.3%
Parents	81.8%	18.2%	0.0%
Note: Amounts may not sum due to rou Source: Legislative Budget Board Sch	0	arch 2020.	

and security include ensuring the physical security of a campus and its occupants. A comprehensive approach to planning for physical security considers locking systems; monitoring systems; equipment and asset protection; visibility of areas and grounds; police and school resource officers; and emergency operations. Emergency and disaster-related procedures must include fire protection, environmental disasters, communication systems, crisis management, and contingency planning. To identify physical hazards, a school district must consider playground safety and overall building and grounds safety. Environmental factors, such as indoor air quality, mold, asbestos, water management, and waste management, also affect the safety of school district facilities.

One of the stated objectives of public education in the Texas Education Code is for campuses to "maintain a safe and disciplined environment conducive to learning." To achieve this objective, safety and security operations go hand-in-hand with education, as districts are responsible to protect students, teachers, and school property while providing a positive learning environment. Working together, district leaders, campus principals, facility managers, transportation supervisors, and safety and security staff identify risks and develop plans to mitigate threats.

A safe and secure school environment as defined by the U.S. Department of Education, Title IV, Section 401, 21st Century Schools and the Safe and Drug-free Schools and Communities Act, encompasses communication systems, fire protection, playground safety, facility safety, environmental regulations, and emergency operation planning.

The Gonzales ISD police chief and SRO use district vehicles to travel to district campuses and facilities as needed. The police chief works at all the campuses and enforces speed limit compliance in school zones. The Legislative Budget Board's School Performance Review Team visited the district in March 2020. At the time of the onsite visit, the police chief was interviewing candidates for the SRO position, which has been vacant since August 2019. Gonzales ISD has a camera surveillance system, and security vestibules at all district campuses. Principals oversee security at their respective campuses by doing walkthroughs and monitoring the camera feeds.

Figure 8–2 shows the results of survey questions the review team asked Gonzales ISD district staff, campus staff, and parents regarding what they thought about how safe students felt at school and in the classroom. A majority of district and campus staff agreed that students felt safe at school; however, about half of parents agreed. For the question concerning safety in the classroom, parents and district and campus staff showed similar rates of agreement.

DETAILED ACCOMPLISHMENT

STOP THE BLEED TRAINING

Gonzales ISD has trained all district staff in the Stop the Bleed program.

In August 2019, the City of Gonzales Emergency Medical Services conducted Stop the Bleed training for all district staff. The course teaches techniques to recognize life-threatening bleeding and act quickly and effectively to control bleeding during an emergency before professional

help arrives. Application of this training can save lives during serious accidents or disasters.

DETAILED FINDINGS

PROCEDURES (REC. 35)

Gonzales ISD lacks consolidated safety and security procedures, which contributes to inconsistent district practices to ensure a safe environment for students, staff, and the community.

Gonzales ISD's Board Policy BP (LOCAL) states that the superintendent and administrative staff develop and enforce procedures for the operation of the district. Procedures include guidelines, handbooks, manuals, forms, and any other documents that define standard operating procedures. This policy also requires that administrative procedures be accessible to staff, students, and the public. The district includes some safety and security procedures in the Gonzales ISD Employee Handbook, Student–Parent Handbook, Student Code of Conduct, the district and campus Emergency Operations Plan (EOP), and at the individual campuses. However, the district does not have a districtwide, consolidated procedures manual that provides guidance for district staff and the community in standard operating safety and security procedures.

The Gonzales ISD Employee Handbook contains general provisions about safety and security. It states that all staff are expected to "observe all safety rules and regulations and report injuries or unsafe conditions to a supervisor immediately." In the Safety section, the district notes that it "has developed and promotes a comprehensive program to ensure the safety of its employees, students, and visitors. The safety program includes guidelines and procedures for responding to emergencies and activities to help reduce the frequency of accidents and injuries." Staff are expected to "observe all safety rules, keep work areas clean and orderly, immediately report all accidents to their supervisor, and operate only equipment or machines for which they have training and authorization." The handbook contains a phone number for staff to call with questions or concerns about the safety program. The manual clearly states that staff should comply with the "safety program," but does not state what it includes or where staff can find it. The Employee Handbook does not specify consequences for violating safety and security procedures.

The Gonzales ISD Student-Parent Handbook states the following expectations for students:

- avoid conduct that is likely to put the student or others at risk. Follow the behavioral standards in the handbook and the Student Code of Conduct, and additional rules for behavior and safety set by the principal, campus, behavior coordinator, teachers, or bus drivers;
- remain alert to and promptly report to a teacher or principal any safety hazards, such as intruders on campus or threats made by any person toward a student or staff;
- · know emergency evacuation routes and signals; and
- follow immediately the instructions of teachers, bus drivers, and other district staff that oversee students' welfare.

The handbook also provides information on other safety and security concerns such as fire drills, tornado and other disaster drills, traffic rules and fines, trained dog searches, and drug testing. However, the handbook does not include information on safety and security operational procedures.

The Student Code of Conduct contains information about the districtwide discipline management plan, a description of prohibited conduct, the disciplinary options and consequences for addressing student misconduct, and the process the district will follow when administering disciplinary consequences. It does not include information on safety and security operational procedures.

General safety and security statements appear in each campus procedure manual and campus website. Entrance procedures at all campuses require external doors to be locked by campus staff. Each designated campus entrance leads to a security vestibule, which is a waiting area where campus staff check in visitors and verify their identity before admitting them. After ringing the doorbell, visitors wait in the vestibule while a secondary entrance remains magnetically locked. Campus administrative staff verify the visitor's identity using the visitor management system and validate the visitor's purpose for being at the campus. Based on the visitor's approved status, campus staff will either issue an entry badge or escort the visitor into the building.

During onsite visit interviews, district staff reported that not all district staff complied with current safety and security policies and procedures, although all said they understood the importance of keeping doors locked and following visitor procedures. District staff also reported that parents often attempted to bypass the security vestibule and enter through unauthorized doors. Staff reported that, although the district removed door stops, some district staff keep classroom doors unlocked and external doors propped open for convenience, and that students sometimes open external doors for adults. Unsolicited, a student gave the review team unauthorized access to the interior of the Gonzales High School main building. Additionally, the team found classroom doors propped open or unlocked at all campuses. Unfettered access to interior classrooms poses a serious security risk and violates the Advanced Law Enforcement Rapid Response Training (ALERRT) best practice of "avoid, deny, and defend." A member of the review team walked the halls of Gonzales North Avenue Intermediate School and was not challenged by students or staff, despite not having a badge and being in plain view.

The review team found the majority of exterior doors locked on all campuses. However, the Gonzales Junior High School and Gonzales North Avenue Intermediate School campuses have unlocked doors in breezeways that connect separate buildings. Although these breezeway doors are inside a fenced perimeter, fences provide an obstacle, not a barrier, to unauthorized entry and do not impede the movement of intruders already on campus. Locked doors provide an additional layer of security against unauthorized persons who gain access to a campus by circumventing a fence. The unlocked breezeway doors could enable an intruder to access the campus interior if they breach exterior fences and safeguards. These unlocked doors also provide uninhibited movement to an insider threat, which could increase the number of victims if a violent incident occurs on campus. During onsite interviews, staff identified the unlocked breezeway doors as a significant security concern, but reported that locking them presents an inconvenience to routine campus operations.

At the time of the onsite visit, the district had no written, districtwide procedure for identification badge design or generation. On several campuses, ID badges are developed by staff who store the materials in a locked room. Some campuses conduct these activities in multiple locations, which increases the risk of theft and counterfeit badge generation by unauthorized individuals seeking access to campuses. During interviews, staff reported difficulty distinguishing between student and teacher identification badges at some campuses. Badges are a tool to verify quickly the identity and status of those who bear them. Poorly designed badges that fail to distinguish between teachers and students and among staff from different campuses result in confusion and have less value as a safety and security tool.

Gonzales ISD does not have a districtwide procedure for key accountability. The district uses physical keys that cannot be deactivated electronically if lost, stolen, or obsolete, and the district has no written process for key accountability or key recovery from staff upon separation or termination from the district, although campuses have access to a spreadsheet with a list of keys assigned to district staff. Additionally, the district delegates authority to recover keys from staff who separate from the district to principals and department leadership, but provides no oversight to ensure that they recover keys and store them securely.

All campuses in the district have security cameras, most of which are functional and enable campus leadership to view the camera feed simultaneously from their laptop computers or wireless telephones. The district stores the camera recordings for a certain amount of time, but staff reported different periods for keeping the recordings on file. The cameras are not monitored constantly, but they serve as a deterrent and as a means to identify a perpetrator after an event takes place. During onsite interviews, staff reported not being sure who maintained camera equipment.

The Texas Education Code, Section 37.109, requires each Texas school district to maintain an active safety and security committee (SSC) that meets at least three times per calendar year. SSC responsibilities include providing recommendations to the Gonzales ISD Board of Trustees and administrators for the following tasks: updating the multihazard EOP; aiding the district in developing and implementing emergency plans consistent with the district's EOP; working with local law enforcement to increase police presence within the district; and reviewing reports that are submitted to the Texas School Safety Center (TxSSC), such as the mandated safety and security audit. The Texas Education Code, Section 37.109(a-1), identifies district staff and community representatives that should be members of the SSC. Gonzales ISD's Board Policy CK (LEGAL) states the SSC statutory requirements. During the onsite interviews, staff reported that the SSC had met three times during school year 2019-20, and attendees included local law enforcement, the superintendent, board president, a board member, campus administrators, parents, and teachers.

Board Policy CKC (LEGAL) and CKC (LOCAL) state that the district shall adopt, implement, and update a multi-hazard EOP for use in the district's facilities. Gonzales ISD has implemented a district EOP and one for each campus. The district EOP states that its mission is "to protect lives, mitigate the effects of a disaster, be prepared to respond to

emergencies promptly and properly, and to restore normal services as quickly as possible." The district EOP contains a hazard assessment for natural, technological, and other disasters, and strategies for drills, evacuation, lockdown, sheltering in place, weather events, reunification, communication, and support. It does not contain daily safety and security drills and procedures. The campus EOPs include the names of the planning team members, a summary of staff skills, the off-campus evacuation site, maps, and a guide for communications, training, and drills. The campus EOPs do not identify standard operating safety procedures.

Gonzales ISD conducted a safety and security audit in August 2017 using comprehensive audit checklists prepared by TxSSC. Among other findings, the audit determined that the doors of many occupied classrooms were unlocked while classes were in session. It also found that surveillance cameras were not used at most campuses, and recommended their installation to monitor locations such as hallways, bus loading zones, parent pickup and drop-off areas, play areas, and student gathering areas. The audit recommended that the district report the results of the audit to the board, develop a written action plan based upon the report's findings and recommendations specifying dates and personnel accountable for completion, and conduct an annual review of the security audit report to monitor ongoing progress. According to minutes from the August 21, 2017, board meeting, the district presented the audit summary to the board in closed session. The district did provide an action plan for implementation of the safety and security audit recommendations, but did not provide annual reviews of the safety and security audit.. During interviews, staff said they were uncertain who was responsible for enforcing safety rules, documenting violations of safety rules, and reviewing security audit findings. The emergency management coordinator oversees the EOP, and the police chief patrols the district for safety and security, but neither is responsible for documenting violations of safety rules. According to the district job description for the police chief, the primary purpose of this position is to "establish and administer security regulations and procedures to protect students, staff, and property."

The district lacks written procedures for soliciting stakeholder feedback regarding safety and security. During onsite interviews, district staff and parents both reported the need for increased security in the district, but did not know how to share their concerns with the appropriate staff. According to the review team's survey results for school year 2019–20,

45.5 percent of parents disagreed with the statement that students felt safe at school, and 18.2 percent disagreed with the statement that classrooms are safe environments for students and teachers. District staff have not developed written documentation to ensure diverse, well-publicized systems to provide all stakeholders with opportunities to provide input specifically into safety and security. Nor have they documented expectations for the types and frequency of surveys or other instruments to administer, the analysis and response to input, and methods and frequency for informing stakeholders of the results.

The district lacks a consolidated procedures manual that guides uniform implementation of standard security operating procedures, includes a method to hold staff accountable for following security procedures, assigns ownership of security audit review, and provides structure for community input on safety and security issues in the district. Without a plan to address these safety and security issues, the district exposes students and staff to potential hazards. Without consolidated documentation of safety and security standard operating procedures, Gonzales ISD staff, students, and community representatives could lack guidance for appropriate behaviors in certain situations. Without a written and communicated process for consequences resulting from the violation of safety and security procedures, the district may communicate a message that it does not value or expect district staff to follow the procedures. Inadequate communication with the community can degrade the credibility of district leadership and erode confidence in the overall safety and security of Gonzales ISD's campuses.

The Safety, Risk, and Emergency Management Department at Laredo ISD publishes a detailed Standard Safety Policy Manual to provide a districtwide guide concerning safety policies and procedures. The manual outlines safety policies and procedures adopted by Laredo ISD and contains chapters covering the following topics:

- · general safety;
- instructional safety;
- · support service;
- the staff return-to-work program; and
- · required forms.

In a section regarding staff reprimands, the manual states that a principal, manager, or supervisor will issue a warning if staff violate safety rules or commit unsafe acts. The first

FIGURE 8-3 LAREDO ISD STANDARD OPERATING SAFETY MANUAL VIOLATION OF SAFETY RULES STATEMENT, SCHOOL YEAR 2016-17

Violations of Safety Rules Statement

All employees must follow all safety rules, regulations, and safe work practices as outlined in the district safety guidelines. Supervisors have the responsibility to ensure that all employees under their supervision are trained and informed to practice safety and to make sure that all employees wear safety equipment appropriate to the task they are performing. Failure to follow safety rules and safe work practices will result in disciplinary actions up to and including termination.

, certify that I have read and understand the above				
statement and have been given an opportunity to have all my questions answered.				
Name of Employee (Please Print)				
Signature of Employee	Date			
Signature of Supervisor	Date			
Department				

three violations result in a written warning, and the fourth results in suspension or termination. Figure 8-3 shows the form used by the principal, manager, or supervisor to document a violation of safety rules and procedures, which is included in the manual.

Source: Laredo ISD, August 2016.

The National Crime Prevention Council's School Safety and Security Toolkit: A Guide for Parents, Schools, and Communities,

published in 2009, is a best practice resource that includes detailed strategies to collect community input regarding safety and security issues. The guide recommends holding a community forum to gain insight into community perceptions and to ask for assistance in developing safety and security plans. The guide provides helpful detail about planning, advertising, and conducting the forum.

Gonzales ISD should develop a districtwide operating procedures manual, which consolidates existing procedures while incorporating national standards and best practices, to guide district safety and security operations.

The police chief should meet with the superintendent to outline the areas for development or expansion of the current procedures found in the Employee Handbook, the Student–Parent Handbook, the Student Code of Conduct, the district and campus EOPs, and at the individual campuses, including the following elements:

- roles and responsibilities of security staff;
- processes for key and badge management;
- monitoring and documenting compliance with procedures;
- · action plan for safety audit recommendations; and
- collecting community input regarding safety and security issues.

The police chief should review procedural manuals from other school districts and national standards to assist in identifying standards to include in the district's manual. The superintendent should present the outline to the board for additional input and provide examples of procedural manuals from other districts. After the board has approved the direction for developing the procedures manual, the police chief should draft it for the superintendent's review and modifications. The superintendent should submit the final draft to the board for approval and adoption.

The district could implement this recommendation with existing resources.

MASS COMMUNICATION TOOL (REC. 36)

Gonzales ISD staff do not use the district's official mass communication tool consistently to convey news of critical incidents.

The district uses SchoolGuard, a mass notification tool, as its official alert system and requires that staff download the application to their personal phones. In the event of an active shooting or other emergency event, staff press the panic button on the application. The application connects staff to 911 emergency services and alerts federal, state, and local law enforcement officers, and other district staff. A map shows the location of the original alert so that staff know what areas to avoid.

Although the district reports that the use of the mass notification application is mandatory, in onsite interviews staff reported that not all staff loaded the application to their phones. Principals and assistant principals acknowledged that some staff did not want the application on their phones, and the district does not enforce its use. Staff reported that lack of compliance is based on three key factors: cost of data usage on personal phones, lack of cellular reception inside district buildings, and fear of large fines assessed by the application company for sending false alarms. Staff reported that they are not allowed access to the district wireless Internet connection, so they must obtain private data plans. During onsite interviews, staff reported that in an emergency, they would text, call, or email campus leadership to inform them of a dangerous situation. District staff expressed confusion about what method to use in an emergency, and some confused the mass communication application with other district communication tools that are used to communicate with district staff and parents. Some staff reported being unsure as to whether they had ever seen the mass notification tool tested or used to initiate a drill. Staff reported that there would be value in having a mass communication tool universally used by all staff for emergencies.

Lack of communication during an emergency could lead to campuses failing to take proper precautions in response to an incident at another campus, which is a particular problem in Gonzales where the campuses are located in close proximity to each other. This communication gap could have significant effects on the safety and security of district staff. Information and time are extremely valuable commodities during a crisis, and the lack of either can thwart the ability to launch an appropriate response, which could lead to injury or death.

The Federal Emergency Management Agency's Fundamentals of Emergency Management Independent Study 230.b provides standards for establishing a comprehensive emergency management capability. During an emergency, communications among and between campus staff is critical. Onsite campus staff are the first responders on the scene of a campus emergency. The methods and procedures used before, during, and after an emergency directly contribute to the district's ability to identify the event effectively, communicate with authorities, and coordinate with other responding agencies.

When an emergency or disaster occurs, on-scene responders coordinate response as part of a complex emergency management network. The primary purpose of an emergency communication system is to support one-way and two-way communications of emergency messages among individuals and groups. The communications systems and processes used by district staff to support emergency and nonemergency events are central to establishing a platform for improved capability and effectiveness.

Gonzales ISD should enforce the use of the designated mass communication tool to inform district staff of critical incidents, implement training in its use, and verify that all district staff have installed the application on their phones.

District leadership should educate district staff about the universal use of the mass communication tool to disseminate information rapidly about emergencies to the entire district and mitigate negative outcomes. The district should introduce and train new staff on the mass communication tool and periodically should test the application during safety and security drills. District leadership should determine if it can require district staff to install the mass communication tool as a condition of employment. If so, campus principals should conduct compliance assessments with the mass communication tool and reinforce its importance to the staff who have not installed it. The district also should coordinate with the Technology Department to reevaluate the department guideline that prohibits wireless Internet access to staff. Enabling staff to have Internet access could mitigate staff concerns about personal data usage, provide universal access to the Internet, and enable faster response times during an emergency.

Since the time of the onsite visit, the district states that the Technology Department has taken steps to make wireless Internet access available to all staff.

The district could implement this recommendation with existing resources.

POLICE DEPARTMENT STAFFING (REC. 37)

Gonzales ISD lacks sufficient staffing to provide effective safety and security oversight for the entire district.

Gonzales ISD maintains its own Police Department with two officers: a police chief and an SRO. Before school year 2014–15, the district contracted with the City of Gonzales to provide SRO support. District staff were uncertain of why the district developed its own Police Department, but they noted that part of the dissatisfaction with the previous arrangement was that the city reassigned the SRO assigned to Gonzales ISD to answer police calls for the city, and the SRO was not always available for afterschool or weekend events.

The police chief currently conducts his duties as well as those of the SRO position, which was vacant at the time of the onsite visit. The district has posted the job vacancy, but district staff reported that it has been difficult to find qualified candidates.

The daily schedule of the Gonzales ISD police chief consists of the following activities: enforcing school zone traffic, checking exterior doors on campuses, visiting classrooms, enforcing lunchtime school zone traffic, checking campuses and security, and enforcing afterschool zone traffic. The police chief patrols the roadways during both school and non-school hours. The police chief estimates working 50.0 percent of daily work hours at Gonzales High School, 20.0 percent at Gonzales Junior High School, and the remaining 30.0 percent among the other four campuses. During onsite interviews, district staff reported that they rarely see the police chief, and expressed concern with the SRO vacancy.

During interviews, district staff identified an active shooter event as the most dangerous threat to the district; however, the district does not have a training continuing education plan for districtwide active shooter response training. The police chief has not trained in ALERRT best practices for district safety and security leaders, such as Advanced Law Enforcement Rapid Response Level I or Level II, Solo Officer Rapid Deployment, or Civilian Response to Active Shooter Events Train the Trainer course. The district recently participated in collaborative training in responding to an active shooter event with city and county first responders; however, this training is not conducted routinely. The necessity to integrate with local public safety agencies is particularly significant considering the small size of the district police department and the fact that active shooter response is labor-intensive. The police chief reported difficulty attending offsite training because he is performing both the police chief and SRO duties.

Lacking a full staff in the area of safety and security presents risk for the district. It is difficult for one security staff to serve six campuses successfully, engage in traffic control, participate in training, and perform the administrative duties required of a police chief. **Figure 8–4** shows the results of the review team's survey, which asked campus staff and parents whether they agreed with the statement that security personnel are respected and liked by the students they serve.

The percentage of campus staff, 37.8 percent, that responded that they do not know if security personnel are respected and liked by the students they serve suggests that

FIGURE 8–4
GONZALES ISD CAMPUS STAFF AND PARENTS SAFETY AND SECURITY SURVEY RESULTS
MARCH 2020

RESPONDENTS	AGREE	DISAGREE	NO OPINION/DO NOT KNOW				
Security personnel are respected and liked by the students they serve.							
Campus Staff	53.2%	9.0%	37.8%				
Parents	54.6%	45.5%	0.0%				
Note: Amounts may not sum due Source: Legislative Budget Board	to rounding. d School Performance Review Team, Ma	arch 2020.					

the police chief may not have a presence at all campuses. During onsite interviews, district staff reported that they would prefer that the police chief and SRO, when hired, are more visible on campuses.

The police chief devotes a significant portion of his daily hours to conducting school zone (speeding) enforcement around campuses. Although this use of time is appropriate from a safety standpoint, it comes at a cost to security, because the time the chief devotes to patrolling roadways takes him away from his primary responsibilities on campuses. Furthermore, individuals engaging in criminal activity easily can exploit established, predictable patterns of operation by security staff.

The National Association of Safety Resource Officers (NASRO) recommends that a district have one SRO per 1,000 students, although districts should consider campus size and number of buildings. NASRO states that officers considered for an SRO position should have at least three years of law enforcement experience. They should have a strong desire to develop positive relationships with youth on a daily basis, and their service records should contain no disciplinary actions or complaints involving youth.

Gonzales ISD should develop a systematic model for calculating the optimum staff size and implement methods to recruit qualified school resource officers to fill department vacancies.

According to the ratio recommended by NASRO, Gonzales ISD should have 2.8 SROs for its student population of 2,859. When the SRO vacancy is filled, the department still would have 0.8 position less than the NASRO standard. The superintendent should coordinate with the police chief and the chief human resources officer (CHRO) to develop strategies to fill the vacant SRO position. The participation of the superintendent and the CHRO will enable the district to prioritize hiring an SRO while the police chief continues his duties for the district. After the district hires an SRO, the

police chief should determine best practice for district Police Department staffing. When the Gonzales ISD Police Department is staffed fully, the police chief should ensure that the chief or the SRO visits all campuses daily. The police chief should also ensure that the SRO schedules are not predictable, and that traffic safety enforcement does not follow a set pattern, such as parking in the same place. The police chief also should provide training for safety and security staff that address the most common concerns and threats in the district, with particular emphasis on completion of ALERRT Active Shooter training and Solo Officer Rapid Deployment training.

The fiscal impact is not assumed until the district performs the analysis to determine optimal staffing levels for the Police Department.

STAFF TRAINING (REC. 38)

Gonzales ISD lacks a method to set and implement training goals for district staff.

A significant percentage of staff have had some form of active shooter response training, but there is no written plan for continuing education or refresher training other than drills. The district does not have a strategic plan for safety and security training that encourages analysis of current training programs or consideration of best practices to select new training programs.

During August 2017, the district conducted a safety and security audit based on TxSSC standards. One of the recommendations from the audit was that certain key staff did not have necessary safety training. Both staff and students have recently attended professionally led Stop the Bleed training, but there is no plan for continuing education or refresher courses.

In February 2020, the district completed an active shooter drill, a simulation of a shooter situation with actors portraying the intruder and victims. The district succeeded in exercising

standard response protocol and reunification procedures. Additionally, the district integrated external agencies and local first responders into the drill. The drill did not constitute a full-scale exercise; it involved one campus, and student participation was limited. Because the active shooter drill was planned and known to staff beforehand, some staff reported they were not completely confident they would know what to do during a an active shooter event.

If staff do not feel prepared to respond to an emergency, it can affect their response time and cause undue harm to staff and students. Furthermore, staff may have difficulty recalling procedures accurately if trainings are provided infrequently.

The TxSSC website provides a toolkit focused on training, drilling, and exercising to prepare district staff and improve their performance during a range of emergencies or crisis events. The website also provides districts with a guide to developing emergency exercises that are unique to their goals and can be based on past occurrences in the district.

The Advanced Law Enforcement Rapid Response Training (ALERRT) Center provides best practices training for law enforcement professionals and civilians at little or no cost. Examples of training offered include the following courses: Active Attack Integrated Response, External Response to Active Shooter Events, Civilian Response and Casualty Care and Civilian Response to Active Shooter Events.

Gonzales ISD should assess training needs and ensure that all district staff receive appropriate safety and security training.

The superintendent should coordinate with the police chief to develop a strategic vision for safety and security training. District leaders should identify the most common threats and worst-case scenarios facing the district. Identifying these issues will develop unity of effort and give staff guidance on how to best allocate resources. The police chief should survey staff to identify gaps in emergency preparedness. Based on survey responses, the police chief should collaborate with district leadership to develop or identify trainings that would help prepare district staff in responding to various emergencies. The district could consider providing additional training for the police chief and identifying district staff with safety and security experience to become subject matter experts in active shooter response by enrolling them in courses that teach them to train other staff. The district also should conduct periodic drills that cover challenging aspects of the emergency operation plan to ensure that staff are trained effectively. The district should conduct a realistic, districtwide active shooter drill that includes all students

from the selected school. Schools should be selected for drills on a rotating basis.

The fiscal impact is not assumed until the police chief completes the assessment of staff training needs and decides which trainings to pursue.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

9. NUTRITION SERVICES MANAGEMENT

Gonzales Independent School District's (ISD) Nutrition Services Department offers breakfast and lunch to all district students. During school year 2018–19, Gonzales ISD had 2,859 students enrolled in prekindergarten to grade 12. The district has six cafeterias.

During school year 2018–19, the Gonzales ISD Nutrition Services Department recorded \$1.4 million in revenue and \$1.5 million in expenditures, totaling a loss of approximately \$51,000. The Legislative Budget Board's School Performance Review Team conducted an onsite visit to the district in March 2020.

FINDINGS

- ♦ Gonzales ISD's Nutrition Services Department has not applied best practices to ensure maximum participation in the Child Nutrition program.
- ◆ Gonzales ISD's Nutrition Services Department has engaged in minimal long-range planning, resulting in inefficient spending and ineffective equipment.
- ♦ Gonzales ISD's Nutrition Services Department is not staffed according to best practices.
- Gonzales ISD's Nutrition Services Department does not have clearly articulated procedures to guide its food services operations.

RECOMMENDATIONS

- ♦ Recommendation 39: Develop a meal preparation, promotion, and presentation program that appeals to students and encourages maximum meal participation.
- ♦ Recommendation 40: Develop a long-range planning system for the Nutrition Services Department that includes regular financial and capital needs planning discussions.
- ♦ Recommendation 41: Require the nutrition services director to perform meals-per-labor-hour calculations regularly to staff the district cafeterias effectively.
- ♦ Recommendation 42: Develop a procedures manual for the Nutrition Services Department.

BACKGROUND

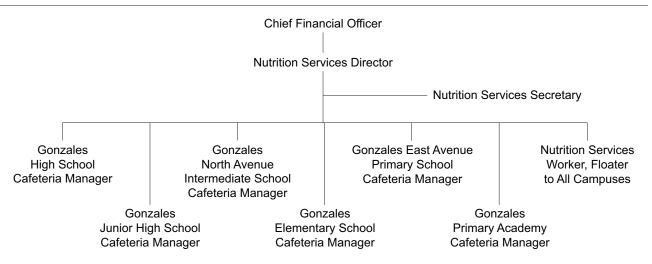
An independent school district's food service operation provides meals to its students and staff. The district may provide meals through the federally funded Child Nutrition Programs, which include the School Breakfast Program (SBP) and the National School Lunch Program (NSLP). The SBP is a federal entitlement program administered at the state level by the Texas Department of Agriculture (TDA). Participating campuses receive cash assistance for breakfasts served that comply with program requirements. Districts receive different amounts of reimbursement based on the number of breakfasts served in each of the benefit categories: free, reduced-price, and paid. Texas state law requires campuses to participate in the breakfast program if at least 10.0 percent of their students are eligible to receive free or reduced-price meals. The NSLP provides funding to serve low-cost or free lunches to students. Like the breakfast program, lunches must comply with federal nutrition guidelines and are reimbursable to campuses based on the number of meals served within the benefit categories. A district's food service operation also may offer catering services to supplement the food services budget or provide training for students interested in pursuing careers in the food service industry.

The food service operation is dependent on the organizational structure of the district. The two primary models of organizing food service operations are self-management and contracted management. Using the self-management model, a district operates its food service department without assistance from an outside entity. Using a contracted management model, a district contracts with a food service management company to manage either all or a portion of its operations. In this arrangement, a district may rely on the company to provide all or some staff, or may use district staff for its operations.

Gonzales ISD participates in the SBP and the NSLP. Prekindergarten students receive breakfast in the classroom. The district plans to expand that program to kindergarten students for school year 2020–21.

The nutrition services director manages the Nutrition Services Department, which consists of 28 staff. The nutrition services director reports to the chief financial officer (CFO)

FIGURE 9–1
GONZALES ISD NUTRITION SERVICES DEPARTMENT
SCHOOL YEAR 2019–20



SOURCES: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020

and directly supervises eight staff. These staff include a nutrition services secretary, a floating substitute nutrition services worker, and six cafeteria managers. The nutrition services director assigns the floating nutrition services worker to various campuses as needed. Each cafeteria manager supervises a lead staff and from one to three nutrition services staff. **Figure 9–1** shows the organization for the Nutrition Services Department.

The nutrition services secretary processes the free and reduced-price meal applications. Before the beginning of the school year, campuses submit requests for student preregistration for the program. Parents can later submit an online application if they do not preregister.

DETAILED FINDINGS

MEAL PARTICIPATION (REC. 39)

Gonzales ISD's Nutrition Services Department has not applied best practices to ensure maximum participation in the Child Nutrition program.

Figure 9–2 shows that, compared to peer districts, Gonzales ISD has had low meal participation rates for breakfast and lunch. Peer districts are districts similar in size and other characteristics to Gonzales ISD that are used for comparison purposes. For lunch meal participation, the district ranged from almost 5.0 percentage points less than one peer district to 18.0 points less than the highest-performing peer district. For breakfast, Gonzales ISD outperformed one peer district

by 2.5 percentage points and recorded up to 18.6 points less than others.

Figure 9–3 shows the lunch meal participation in Gonzales ISD during the last three years compared to peer districts. Gonzales ISD's lunch meal participation has remained low and stagnant, without a significant increase, while all other peer districts have experienced a steady increase in meal participation.

The district has tried to increase meal participation. Staff reported that the Nutrition Services Department developed occasional incentive programs for students to eat in the cafeteria. For example, at one campus, students who ate in the cafeteria were entered into a raffle to win a prize. The nutrition services director stated the district occasionally contracts with a chef to train staff and develop new recipes. Staff also reported that a cafeteria manager was informed that a vacant staff position would be filled if student meal participation increased. Meal participation increased, but the position was never filled. The department's attempts were sporadic, not part of a developed plan, and did not have clearly articulated objectives.

The district's School Health Advisory Council (SHAC) has developed a wellness plan, a common tool used by districts to increase nutritional awareness and involve students in their nutritional programs. Required by Board Policy FFA (LOCAL), the wellness plan addresses the district's nutrition education and promotion goals. To meet these goals, the

FIGURE 9–2
GONZALES ISD MEAL PARTICIPATION RATES COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2018–19

DISTRICT	ENROLLMENT (1)	AVERAGE BREAKFAST PARTICIPATION	AVERAGE LUNCH PARTICIPATION
Gonzales ISD	2,876	42.6%	57.3%
Calhoun County ISD	3,863	40.1%	70.8%
Castleberry ISD	4,023	49.2%	75.3%
Tuloso-Midway ISD	4,010	61.2%	62.1%
Peer Participation Average		50.2%	69.4%

Note: (1) The Texas Department of Agriculture enrollment shown for school year 2018–19 differs from the enrollment recorded in the Texas Education Agency's Texas Academic Performance Report.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Department of Agriculture, January 2020.

FIGURE 9–3
GONZALES ISD LUNCH PARTICIPATION RATES COMPARED TO PEER DISTRICTS
SCHOOL YEARS 2017–18 TO 2019–20

DISTRICT	2017-18	2018–19	2019–20 (1)
Gonzales ISD	55.3%	57.3%	56.0%
Calhoun County ISD	63.6%	70.8%	73.1%
Castleberry ISD	73.0%	75.3%	75.7%
Tuloso-Midway ISD	50.5%	62.1%	68.1%
Average of Peers	62.4%	69.4%	72.3%

Note: School year 2019-20 shows data for the fall semester only.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Department of Agriculture, March 2020.

district distributes newsletters focused on nutrition to families in the district. However, this initiative has not increased meal participation among students. Other than awarding prizes intermittently to diners, the district does not engage in regular student-centered engagement in the cafeterias, such as formal meal tastings or recipe demonstrations.

During a focus group, campus principals noted that they have observed cafeterias frequently testing new recipes, an observation confirmed by the review team during its onsite visit. However, the method for testing new recipes involved cutting the original meal into small pieces, often resulting in students receiving a portion of a meal that does not represent its overall taste. For example, a new meal tested for breakfast involved a dough wrap encasing potato and sausage, but cafeteria staff sliced it in such a way that some students received a portion that contained dough with no filling. During the serving of the new meal, students asked what the food was while deciding whether to try it. Staff did not provide a name or description for the food, and several students decided not to try it after not receiving an answer. Students were not asked for feedback after sampling the new items. Staff said that sometimes they ask students their

opinion of the food, but that the feedback is informal and not recorded in a quantifiable manner. The cafeteria staff reported making decisions about the success of the meal based on whether students took all the samples provided. Many Nutrition Services Department staff and campus staff said that students do not indicate interest in eating some of the meals served.

The review team observed several incidents of food being prepared without following the recipe, occasionally leading to food being cooked at lower or higher temperatures than required and then served dry or congealed. At times, cafeteria staff prepared and presented food in an unappealing manner. For example, meals often were wrapped in plastic, preventing students from seeing their contents while selecting options. At times the serving line was in disarray, with food stacked up and out of the traditional serving stations and parchment paper discarded throughout, leading to a disorganized and unappealing appearance. Since the review team's onsite visit, the nutrition services director states that he has provided each cafeteria manager with updated recipe books and access to the districts menu planning program. He reports that cafeteria staff are using the recipes consistently.

Despite observing service at most cafeterias for both breakfast and lunch, the review team never observed batch cooking, which involves preparing and cooking food in small batches as needed throughout the serving time to provide fresher food and reduce food waste. The nutrition services director said that staff performed batch cooking whenever feasible, but staff reported being unaware of the term during interviews, and when it was described to them said that batch cooking was not a standard practice in district cafeterias. Instead, staff reported preparing food all at once and then often placing it in warmers, where it remains until serving time and throughout the meal process. This practice was consistent with the review team's observation of vegetables shriveled from the heat, crusts dried to the point of curling, and chili losing all moisture.

A number of issues contribute to the district's low meal participation rates. As long as the district's nutrition strategy focuses on awarding prizes instead of interactive and engaging ways to promote students' investment in their food and cafeterias, then students likely will continue to bring their own food or eat food off campus. The benefits of increasing school meal participation includes wellness promotion, obesity reduction, and improved academic performance among students eating nutritious food. For example, according to the national Food Research and Action Center, studies show that participation in school breakfast is associated with improved math grades, attendance, and punctuality. Students who eat breakfast show improved cognitive function, attention, and memory. Research shows that children who eat breakfast at school, closer to class and test-taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. They found that school breakfast participation is associated with a lower body mass index (an indicator of excess body fat), lower probability of being overweight, and lower probability of obesity. Educator comments, published on the The U.S. Department of Agriculture (USDA) Food and Nutrition Service's website, further assert that children who do not eat properly are hard to discipline. Conversely, students who receive a nutritious lunch show a marked improvement in attitude.

Gonzales ISD meals provide 25.0 percent of the daily nutrient requirements at breakfast and 33.0 percent of the daily requirements at lunch. High levels of meal participation are evidence that more students are receiving nourishing meals to complement learning in the classroom. In addition, if participation is not maximized at the campus level, the

district forgoes potential revenues from reimbursement claims for students who are not participating.

The Centers for Disease Control and Prevention (CDC) in 2014 published *Putting Local School Wellness Policies into Action: Stories from School Districts and Schools*, a collection of successfully implemented wellness policy initiatives. A charter school in Chicago developed a comprehensive wellness policy that included efforts to engage students in the process of growing, making, testing, and marketing food. Active gardening programs that provided vegetables for the cafeteria vested students in the products being served. A chef visiting the school to demonstrate and teach about new foods, such as tofu, before placing them on the menu increased student interest in cafeteria offerings. The school experienced increasing rates of meal participation after adopting the wellness policy.

A key strategy for increasing participation is providing enjoyable and well-prepared meals. This strategy requires thorough meal testing and positive meal preparation and presentation, none of which is present in the district.

Rutgers University's fact sheet *Creating a Taste-Testing Event:* A Resource for School Nutrition Professionals describes several methods of increasing the value of meal testing. These methods include simple surveys or ballots that taste-testers can complete to provide feedback easily. The district's current method risks students trying and disliking a meal that the Nutrition Services Department nevertheless adds to the menu because it was unaware of the students' feedback.

Finally, the CDC's publication on wellness policies also recommends consistent professional development in meal preparation and presentation, including training staff on learning new recipes, following recipes, and improving their presentation skills. The USDA provides training on batch cooking to increase the service of fresh food and reduce the likelihood of food being held for long periods in warmers. The USDA also provides training modules for food preparation and presentation. Effective districts provide trainings that enable staff to observe the proper preparation and development of meals using recipes that are common in the kitchen. According to the nutrition services director, the district provides ongoing professional development to staff as needed.

Gonzales ISD should develop a meal preparation, promotion, and presentation program that appeals to students and encourages maximum meal participation.

FIGURE 9–4
GONZALES ISD ESTIMATED ANNUAL INCREASED LUNCH REIMBURSEMENT
MARCH 2020

MEAL TYPE	ADDITIONAL MEALS PER YEAR (1)	REIMBURSEMENT RATE (2)	INCREASED ANNUAL REIMBURSEMENT
Free Meals	8,931	\$3.41	\$30,454
Reduced-price Meals	584	\$3.03	\$1,771
Paid Meals	1,510	\$0.34	\$514
Totals (3)	11,026		\$32,738

Notes:

- (1) To achieve the increase in number of meals served, the district must add 2.4 percent in participation from the school year 2018–19 participation levels; the 11,026 total equates to 2.4 percent of the total possible meals served in the district during school year 2018–19.
- (2) Gonzales ISD receives a \$0.02 greater lunch reimbursement rate than the standard reimbursement rate due to a high percentage of students identified as economically-disadvantaged.
- (3) Amounts may not sum due to rounding.

Sources: Legislative Budget Board School Performance Review Team; Texas Department of Agriculture, National School Lunch Program District Profile, March 2020.

The nutrition services director should meet with the SHAC to assess the district's existing wellness plan and determine the feasibility of the best practices used in other districts and summarized by the CDC. The director and the SHAC should amend the wellness plan to promote student investment in the food and campus cafeterias using best practices observed in other districts and campuses. The nutrition services director should recommend this amended wellness plan to the Gonzales ISD Board of Trustees (board) for adoption.

The nutrition services director should establish department procedures for meal testing, requiring staff to make specific determinations before testing the food, including:

- Can the food be sampled, or would the full meal be required to effectively test?
- Is in-depth feedback needed? Should the test be run with a small number of students in a classroom, or can more general feedback be gathered?
- What method will record feedback?
- Will the staff conduct multiple trials for the meal? This consideration is particularly important for a meal that involves a component that may be unfamiliar to the students.
- What level of positive feedback will be required before adding an item to the menu?

The cafeteria manager should consider these questions during the formulation of the test and develop the test based on the responses. The cafeteria staff should perform the test so that the department can access useful feedback before serving the meal as a part of the menu.

The nutrition services director should develop a scorecard on which to score a serving line for food appearance and presentation. It should include checks for the freshness of the food, appealing appearance, and the overall presentation of the serving line. Poor scores should result in the director meeting with the cafeteria manager and staff to discuss the areas not meeting standards. The nutrition services director should offer trainings for targeted areas that need improvement.

The fiscal impact assumes that the district implements strategies to increase breakfast and lunch participation to the peer district averages, resulting an annual gain of \$43,919.

Figure 9–4 shows the additional number of meals served and additional reimbursement revenue per year if the lunch participation rate increases from 57.3 percent to 69.4 percent, the average of peer lunch participation during school year 2018–19.

Figure 9–5 shows the additional number of meals served and additional reimbursement revenue per year if the breakfast participation rate increases from 42.6 percent to 50.2 percent, the average of peer breakfast participation during school year 2018–19.

If the district observes these increases to lunch and breakfast participation, then it will see an annual increase in revenue of \$43,919 (\$32,738 + \$11,181). The total five-year fiscal impact would be \$219,595.

FIGURE 9–5
GONZALES ISD ESTIMATED ANNUAL INCREASED BREAKFAST REIMBURSEMENT SCHOOL YEAR 2018–19

MEAL TYPE	ADDITIONAL NUMBER OF MEALS (1)	REIMBURSEMENT RATE	INCREASED ANNUAL REIMBURSEMENT
Free Meals	5,609	\$1.84	\$10,321
Reduced-Price Meals	367	\$1.54	\$565
Paid Meals	949	\$0.31	\$294
Total (2)	6,925		\$11,181

Notes:

- (1) To achieve the increase in number of meals served, the district must add on an additional 1.5 percent in participation from the school year 2018–19 participation levels. The 6,925 total equals 1.5 percent of the total possible meals served in the district during school year 2018–19
- (2) Amounts may not sum due to rounding.

Sources: Legislative Budget Board School Performance Review Team; Texas Department of Agriculture, National School Lunch Program District Profile, March 2020.

LONG-RANGE PLANNING (REC. 40)

Gonzales ISD's Nutrition Services Department has engaged in minimal long-range planning, resulting in inefficient spending and ineffective equipment.

The Nutrition Services Department is operating without substantial planning. The department does not have a mission statement or articulated goals. The nutrition services director coordinates with the CFO to develop the budget for the department before the beginning of the school year. After the nutrition services director inputs the department's needs into the district's financial software, the CFO compares the projected budget to the previous year's budget. If there is a large variance from the previous year's budget, the CFO and nutrition services director discuss concerns and may revise the budget. If large purchases are planned, they discuss the need for them, and the CFO delivers a report to the board. The CFO stated that the district expects the nutrition services director to know the needs of the department and to be the expert in that field.

The nutrition services director has meetings twice a month with the CFO to discuss the needs of the department broadly. The CFO said that these discussions do not involve data and rely on the expertise of the nutrition services director to inform the discussion. The director does not develop plans

for the department aside from the annual budget discussions, which do not include written established plans or goals.

Despite having substantial input into the department's budget, the director does not receive or use monthly financial statements. The department produces a monthly activity report, but it does not summarize income and cost items into useful categories. Monthly financial statements can detect when increasing food or labor costs exceed available revenue before the year ends. According to the financial documents provided by the district, the Nutrition Services Department's expenses have been consistently greater than revenues during school years 2017-18 and 2018-19. School year 2016-17 was the last year during which the department made a profit. Figure 9-6 shows department spending during the past three years. Since the time of the review, the nutrition services director states that he has started submitting monthly operating reports to the CFO for review.

Additionally, the department does not track disbursements of USDA-donated foods to campuses through monthly accounting. The nutrition services director receives the foods, sends the amount needed to campuses, and divides the total value by the number of campuses equally, regardless of the actual disbursement.

FIGURE 9–6
GONZALES ISD NUTRITION SERVICES DEPARTMENT FINANCIAL SUMMARY
SCHOOL YEARS 2016–17 TO 2018–19

YEAR	REVENUE	EXPENSE	PROFIT OR (LOSS)
2018–19	\$1,423,869	\$1,475,279	(\$51,410)
2017–18	\$1,338,759	\$1,351,204	(\$12,444)
2016–17	\$1,456,878	\$1,441,417	\$15,461

Source: Gonzales ISD, Budget Snapshot Report, January 2020.

The nutrition services director stated that a recent priority has been purchasing new equipment for cafeterias. The review team observed several examples of these recent purchases, including new chest freezers in several kitchens. Some of these chest freezers, which are not standard for commercial kitchens, were placed in a manner that impeded the food delivery process and did not include temperature or inventory logs. The freezers do not have American National Standards Institute Certification, which is required for institutional equipment, and are labeled for domestic or home use. At least four of the freezers observed were recent purchases, although several were not in use. The nutrition services director said that the department purchased the freezers because they were a "good deal" and could be used when needed. According to the nutrition services director, chest freezers were purchased as an emergency response option so that food would not spoil in the event of a freezer outage.

As another example, new equipment and remodeling impeded safe maneuverability in the kitchen, resulting in high-traffic, narrow passages through which staff carry hot food for each meal. Additionally, the department spent approximately \$42,000 on a truck to deliver commodities from the delivery point to each campus. However, because the campuses are located within a few minutes of each other, the truck sits much of the time for unloading items with the refrigeration doors open, and it does not have enough time while traveling between campuses for its internal temperature to recover. Properly wrapped food can be transported safely at these distances, making a refrigerated truck unnecessary.

The review team also observed areas in which new equipment or repairs were needed urgently. For example, the high school cafeteria uses mesh filters, which are known fire hazards and have been prohibited by fire codes in industrial kitchens for many years. The same kitchen had a tripping hazard caused by uneven flooring in front of a walk-in refrigerator, as shown in **Figure 9–7**.

The same kitchen does not have a separate handwashing station. Instead, a sign designates one side of a double-basin sink as "hand wash sink only." However, this practice risks contaminated water landing on the vegetables in the immediately adjacent vegetable washing station. **Figure 9–8** shows this arrangement. Additionally, the stove range in the high school cafeteria kitchen was missing burner control knobs. It required pliers to turn off two burners, preventing quick action in an emergency.

FIGURE 9–7
GONZALES ISD HIGH SCHOOL KITCHEN FLOORING
MARCH 2020



SOURCE: Legislative Budget Board School Performance Review Team. March 2020.

FIGURE 9–8
GONZALES ISD HIGH SCHOOL KITCHEN HANDWASHING
STATION, MARCH 2020



SOURCE: Legislative Budget Board School Performance Review Team, March 2020.

The nutrition services director does not have a capital equipment plan, which assesses and prioritizes the needs of the entire department. The director authorizes purchases when he finds what he considers a good deal on equipment, instead of when the need for equipment is a high priority to the district. Since the time of the review, the nutrition services director has created a five-year financial plan that includes a line item for capital equipment purchases. The district expects to purchase \$340,000 in capital equipment during the five-year period.

Gonzales ISD's Nutrition Services Department does not engage in regular financial or facility planning. Effective districts use monthly financial statements to ensure that the nutrition services program is operating efficiently and to support decision making about spending priorities. Without performing a comprehensive capital equipment assessment, the director risks purchasing equipment that does not address the highest priority needs in the kitchen, which can result in large purchases of unused equipment or equipment that violates codes governing commercial kitchens, such as the use of chest freezers.

Gonzales ISD should develop a long-range planning system for the Nutrition Services Department that includes regular financial and capital needs planning discussions.

The nutrition services director should collaborate with district leadership, including the CFO, the director of operations, and campus principals, to develop a mission statement for the Nutrition Services Department, followed by developing goal statements that accomplish the mission. The nutrition services director and the CFO should use the mission and goal statements to guide the development of a long-range financial plan for the Nutrition Services Department.

The long-range plan should include detailed budget preparation, considering projected revenue based on current trends, anticipated labor and food costs, and expected onetime expenses, such as equipment replacement. The director should perform a capital equipment assessment to prioritize the replacement and repair of kitchen equipment and to justify expected expenses added to the budget. The nutrition services director should collaborate with the director of operations and maintenance and facilities staff on the assessment.

The long-range plan should include specific expectations for the director to develop monthly financial statements that analyze the Nutrition Services Department's progress toward achieving district goals. Information in the statements should enable the director to track changes in labor costs and cost per meal served by comparing current costs to those incurred at the same time during the previous year. The director should be expected to demonstrate to the CFO plans to adjust expenses to account for identified cost increases.

The district could implement this recommendation with existing resources.

STAFFING STANDARDS (REC. 41)

Gonzales ISD's Nutrition Services Department is not staffed according to best practices.

As shown in **Figure 9–1**, each cafeteria has a manager. Campus cafeteria managers supervise a lead staff and one to three additional staff. Managers and lead staff work 7.5 hours a day, and other staff work between 3.0 to 7.0 hours a day. Most staff are present in the kitchens by 7:00 AM. The department also has 3.0 substitute staff working part-time at assigned kitchens as the need arises.

Aside from the substitute staff, each cafeteria staff works the number of hours assigned by the nutrition services director. When those hours are not met, the nutrition services secretary informs the manager of the additional time needed by the staff. Schedule changes are made for the next week to ensure that each staff receives the expected total amount of work hours. These practices were noted during interviews with the nutrition services director, the nutrition services secretary, and the cafeteria staff.

Cafeteria staff reported that they had fewer staff than needed. Staff noted that the managers and lead staff have difficulty completing their tasks within their scheduled hours, particularly the lunch tasks and cleaning up at the end of the day. During a focus group, managers reported the need to request the substitute staff to help complete the daily workload even when the cafeteria had no absent staff.

The nutrition services director does not calculate the meals per labor hour (MPLH) served in the district or in each cafeteria regularly. MPLH is calculated by determining the number of meals or meal equivalents served and dividing it by the number of labor hours used to prepare those meals. At the review team's request, the nutrition services director calculated the district's MPLH for October 2019, and determined that the MPLH for most campuses ranged from 10.0 to 12.0. One campus had a much higher MPLH of 18.0. The review team's own calculation of the district's MPLH for the fall semester, September through December

2019, yielded a narrower range of results by campus, as shown in **Figure 9–9**.

The district has recorded a decrease in meal participation during the spring semester, which would result in lower overall annual MPLH amounts. Labor costs increased in the Nutrition Services Department during school year 2018–19, contributing to expenditures exceeding revenues in the department's budget. Without regularly calculating MPLH, both for the district and the individual cafeterias, the nutrition services director is unable to determine whether staffing levels are appropriate based on the number of meals prepared and served. Without an accurate understanding of the labor needs for the district cafeterias, the director is unable to budget effectively.

Best practices promoted by the School Nutrition Association (SNA), a national organization of school nutrition professionals, indicate that the MPLH at a campus should be approximately 18.0 meals. According to the SNA publication *Case Study: Benchmarking Meals per Labor Hour (MPLH)*, a district cafeteria with an MPLH rate of less than 14.0 should consider adjusting its labor hours. According to the review team's analysis, the MPLH rates at Gonzales ISD's cafeterias range from 10.0 to 17.0, and four of the six campuses' rates are less than the best practice threshold of 14.0. In another publication, *How to Calculate and Establish Meals per Labor Hour*, SNA notes that calculation of MPLH is important because it:

- measures the financial success of the [school nutrition] program;
- monitors the labor efficiency of operations;
- · determines appropriate staffing levels;
- · drives the labor budget; and
- · makes the case for operational changes.

The same publication also recommends the use of internal benchmarking, which facilitates efficient use of key performance indicators, such as MPLH. This practice would involve the Nutrition Services Department tracking MPLH data and comparing results among months and among years to determine ongoing changes and track increasing labor costs in the district.

Gonzales ISD should require the nutrition services director to perform MPLH calculations regularly to staff the district cafeterias effectively.

FIGURE 9–9
GONZALES ISD MEALS PER LABOR HOUR (MPLH) BY
CAMPUS
SEPTEMBER TO DECEMBER 2019

CAMPUS	MPLH
Gonzales High School	10.0
Gonzales Junior High School	11.6
Gonzales North Avenue Intermediate School	10.0
Gonzales Elementary School	12.0
Gonzales Primary Academy	17.0
Gonzales East Avenue Primary School	14.1
Average	12.5

Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

The nutrition services director should consult with the CFO to determine a regular schedule for calculating the MPLH at each campus and comparing calculations to data from past months and years. After the process has been established, the nutrition services director should align the number of staff with the best practice range of 18.0 MPLH at each campus. During this process, the director should coordinate with cafeteria managers to determine the hours that would best support their needs at each cafeteria. As staff stated that most assistance was needed during the lunch and cleaning periods after meals are served, the director should determine the appropriate work hours for staff. Effective districts often schedule the cafeteria manager and a lead staff as full-time, and other positions are part-time and work during the busiest hours. The nutrition services director should evaluate this option to support cafeteria staff appropriately.

After the district has established accurate regular accounting of MPLH, it can assess whether staffing levels should be adjusted. This adjustment could occur through attrition, enabling the director to adjust hours as vacancies occur.

A fiscal impact cannot be assumed until the nutrition services director determines the appropriate staffing levels and achieves those levels in the cafeteria staff. The Nutrition Services Department would likely save funds in the long-term by implementing regular MPLH assessments and maintaining best practices.

PROCEDURES (REC. 42)

Gonzales ISD's Nutrition Services Department does not have clearly articulated procedures to guide its food service operations.

The nutrition services director stated that the Nutrition Services Department does not have a procedures manual. Such a manual would include guidelines for the students, the cafeteria staff, and the campus staff. Examples of operations that should be governed by procedures include whether staff can eat meals in the cafeteria and whether they are charged for those meals, calculations for meal pricing, or when community groups can use the cafeterias for events. These manuals also present an opportunity to express the expectations for cafeteria staff.

During the onsite observation of Gonzales Primary Academy, the review team noted a violation in the posted health inspection report related to low food temperatures. The director acknowledged that staff did not regularly check food temperatures, which could have prevented these violations.

At the same campus, the review team did not observe staff following recipes when cooking meals. When the review team asked for the recipe, the cafeteria manager acquired it but said that all recipes remain in her office unless staff have a question. The manager acknowledged that this process means that temperatures and cooking times are based on memory or estimates. The nutrition services director said that new staff are trained at the Gonzales Primary Academy cafeteria before they are assigned to other cafeterias.

At several cafeterias, the review team observed production sheets that were inaccurate or blank. A production sheet is "a required daily document that records all reimbursable meals prepared and served daily through the National School Lunch Program and School Breakfast Program" according to the TDA. These records support meal claims submitted for reimbursement and help manage the food service operation by recording the meals prepared by staff, the meals taken by students, and the quantity of leftovers. In interviews with cafeteria staff, staff reported being unclear on the rules for production sheets and having received conflicting information from the nutrition services director. Cafeteria managers said that they had not received sufficient training on completing production sheets.

Staff reported that they often do not have access to reliable email or sufficient phone connection to ensure that they receive communications from the director in a timely manner. The review team visited cafeterias in which no cell service was available to receive calls or texts. Staff said that they have raised the issue with district authorities, but the district still relies on those methods of communication.

Some students and adults pay for their meals in cash. Because the department has no procedures manual, it has no documented method for collecting, storing, and transporting cash. Staff described a consistent method overall that had been communicated informally for cash handling. Cafeteria managers count the cash at the end of the day and report the amount to the nutrition services secretary. The managers then bring it to the Nutrition Services Department office, where the nutrition services secretary accounts for it to ensure that the presented amount matches the reported amount. The nutrition services secretary then transports the cash to the bank. The process changes on Fridays, when the cafeteria managers take the cash directly to the bank. During the onsite visit, the review team observed bags for transporting cash open in the kitchen at some cafeterias. The review team observed that some cafeterias issued receipts for cash purchases, and others were unaware that the process existed at other cafeterias. The review team observed inconsistencies between the adult breakfast meal prices charged at Gonzales ISD campuses and those in the TDA Administrator's Reference Manual (ARM) guidelines, leading to lower-priced adult breakfast meals than specified in the guidelines.

Without adequate and established procedures, staff are left to develop their own informal rules, which may not be consistent with best practices. Cafeterias do not always follow recipes as required, leading to food temperatures that do not meet health standards, and potentially allowing meals to be served that do not meet reimbursement nutrition guidelines. Production records could be inaccurate or not used at all, which may lead to inaccurate counts of reimbursable meals or a failure to note recurring food waste. Inconsistent cash handling policies can lead to missing cash and the inability to audit cash proceeds.

Effective nutrition service programs have developed procedures manuals to document expectations in the cafeterias. Federal requirements dictate that districts maintain sufficient documentation to demonstrate that the meals served and claimed for reimbursement comply with meal pattern requirements. The following documentation and records that support reimbursement must be kept on file:

- · standardized recipe and preparation techniques that are used during planning and serving reimbursable meals that are constant in measurement and preparation;
- number of meals planned, number prepared, number served, and amount of leftover food; and

 child nutrition label or product formulation statement documenting the ingredient quantities of each purchased or prepared item contributing to the meat or meat alternate component of the reimbursable meal.

TDA's ARM guidelines, February 2020, state that all districts "must develop and follow standardized recipes. Standardized recipes and preparation techniques must be used when planning and serving reimbursable meals. To qualify as a standardized recipe, a recipe must have an established and specified yield, portion size, and quantity. In addition, the ingredients must be constant in measurement and preparation."

Additionally, the guidelines state that districts "must keep complete and accurate food production documentation including food production records." Districts should use the following guidance in maintaining production records:

- the documentation requirement applies to all lunches, including salad and other food bars, quick lines, sack meals, field trips, etc.;
- the records must show how the meals contribute to the daily required food components and quantities for each age or grade group, including the food item replaced, substituted food item, and reason for the substitution; and
- any meal claimed for reimbursement must be supported by food production documentation.

According to SNA's Keys to Excellence: Standards of Practice for Nutrition, the food service director should establish procedures for maintaining required daily food production records at each school site. Effective districts complete production records each day following meal service. A good practice is to have production records that are preprinted to match menus. Portion sizes and serving utensils are specified on the production records.

Effective districts maintain complete and accurate food production records for all meals claimed for reimbursement. Food production records and standardized recipes are used in conjunction with the USDA Food Buying Guide. In a well-developed production system, standardized recipes and food production records are used together to plan, prepare, serve, and document the meals served and claimed for reimbursement. Districts may develop their own food production records or use the TDA food production records, which is available at www.squaremeals.org in the forms

section. The TDA's *Daily Food Production Record for Central Kitchen, Receiving Kitchen, and Onsite Kitchen* is a document that helps districts develop their food production records.

Gonzales ISD should develop a procedures manual for the Nutrition Services Department.

The nutrition services director should examine other districts' procedures manuals to determine the necessary components, ensuring at least that the requirements listed above are covered. Humble ISD's Child Nutrition Department (Humbleisd.net) has a detailed procedures manual that documents the standards for personnel to follow. The director should develop a procedures manual that fits the needs of Gonzales ISD's Nutrition Services Department while meeting requirements for nutrition and reimbursable meals. Furthermore, the procedures manual should include specific cash handling procedures and the appropriate calculation for determining meal price. After gaining board approval, the nutrition services director should publicize the manual to cafeteria staff, emphasizing that staff will be required to follow the procedures, which the department will use to determine the efficiency and efficacy of the cafeteria staff.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATION

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

During interviews and onsite observations, the review team noted that nutrition services staff have low morale. Several reasons were offered, including that campus leadership does not include cafeteria staff in staff recognition efforts. Additionally, staff recognition efforts within the department, such as a holiday party, have changed to training exercises that did not recognize effort from the staff. The campus leadership and nutrition services director should develop methods to encourage staff investment and a sense of community among cafeteria staff.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's (LBB) School Performance Review Team identified a fiscal impact for **Recommendation 39** (meal participation). The Legislative Budget Board's School Performance Review Team could not determine a fiscal impact for other recommendations. The district's implementation of these recommendations may result in eventual savings in several areas; however, the review team does not have the information necessary to estimate the savings. The implementation of **Recommendation 41** (staffing standards) likely would decrease staffing costs for the Nutrition Services Department in the long term.

RECO	OMMENDATION	2020–21	2021–22	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
9. NI	UTRITION SERVICES MANAGEMENT							
39.	Develop a meal preparation, promotion, and presentation program that appeals to students and encourages maximum meal participation.	\$43,919	\$43,919	\$43,919	\$43,919	\$43,919	\$219,595	\$0
Tota	ıl	\$43,919	\$43,919	\$43,919	\$43,919	\$43,919	\$219,595	\$0

10. COMMUNITY INVOLVEMENT

The Gonzales Independent School District (ISD) has several positions whose responsibilities include engaging the community. Gonzales ISD also has an education foundation that serves as a nonprofit organization and raises awareness and funds for school district events and interests. **Figure 10–1** shows the district's organizational structure as it relates to community involvement.

ACCOMPLISHMENT

 Gonzales ISD operates an afterschool program that provides enrichment and improved outcomes for students.

FINDINGS

- Gonzales ISD's education foundation and district administrators do not use or publicize available grant funds adequately.
- ♦ Gonzales ISD does not plan and oversee its parent and community involvement efforts effectively.
- ♦ Gonzales ISD lacks consistent communication about campus events with the community.

RECOMMENDATIONS

♦ Recommendation 43: Help teachers access education foundation funds efficiently and

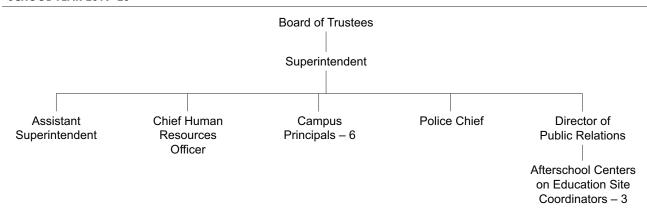
- extend the availability of grant funds to groups other than teachers.
- ♦ Recommendation 44: Coordinate district-level and campus-level support to promote parental and community involvement and make existing programs more accessible to volunteers.
- ♦ Recommendation 45: Improve communication about campus events with parents and the community to include regular updates to the district's websites and a consistent social media policy.

BACKGROUND

An independent school district's community involvement function requires communicating with stakeholders and engaging them in district decisions and operations. District stakeholders include students, staff, parents, residents, and businesses. Stakeholders must be aware of issues facing the district, support its priorities, and respond to its challenges. Communication tools include public meetings, campus-to-home communications, family and community engagement events, local media, the district's website, other technological tools, and social media.

A successful community involvement program addresses the unique characteristics of the school district and the community. A high level of community involvement plays

FIGURE 10–1
GONZALES ISD COMMUNITY INVOLVEMENT ORGANIZATION
SCHOOL YEAR 2019–20



Sources: Legislative Budget Board School Performance Review Team; Gonzales ISD, March 2020.

a critical role in school improvement and accountability systems. Community representatives and volunteers provide valuable resources that could enrich and enhance the educational system. In turn, the community directly benefits from an informed citizenry, an educated workforce, and future community leaders.

Gonzales ISD is located in Gonzales, approximately 75.0 miles east of San Antonio. Gonzales county had a population of 20,837 during calendar year 2018, an increase of more than 1,000 residents from the official 2010 census. The per capita income in Gonzales was \$26,618 in 2018, and the median value of homes was \$112,200.

The superintendent directs the community involvement function at Gonzales ISD. The superintendent oversees the campus principals, who manage their own campus websites and social media; the assistant superintendent, who monitors the implementation of the parent/family engagement plan; and the director of public relations (PR), who handles open records requests, updates the district website and social media accounts, and supervises the afterschool program.

Gonzales ISD schedules events for community engagement that include family Thanksgiving dinners and movie nights. The district collaborates with local organizations to support the district and community; these organizations include the Belmont Lady Club, Gonzales National Bank, Gonzales Lion's Club, Lamar University, local franchises of restaurants, and Wells Fargo Bank.

The district's director of PR manages the process for responding to information requests from community representatives, local media, or other interested parties. This information management includes tracking requests to help ensure prompt response times. The Legislative Budget Board's School Performance Review Team visited the district during March 2020.

DETAILED ACCOMPLISHMENT

AFTERSCHOOL PROGRAMMING

Gonzales ISD operates an afterschool program that provides enrichment and improved outcomes for students.

Gonzales ISD participates in the Texas Afterschool Centers on Education (ACE) program. The ACE program is administered by the Texas Education Agency (TEA) and funded by the U.S. Department of Education. During school year 2017–18, TEA invited the district to participate

and the district fully implemented the program during school year 2018–19.

The ACE program's goal is to improve students' attendance, behavior, and academics. The program reaches this goal by providing supplemental learning spaces for students who are struggling in these areas. The program provides a regular, safe outlet for students to receive additional tutoring, homework assistance, and enrichment activities.

The district's ACE program involves three sites that collectively serve every campus. The site at Gonzales Elementary School serves students from that campus and from Gonzales East Avenue Primary School and Gonzales Primary Academy. The site at Gonzales Junior High School serves students from that campus and from Gonzales North Avenue Intermediate School. The third site at Gonzales High School serves students from that campus only.

Each site is staffed by a site coordinator and several parents and teachers. The parents and teachers participate as needed according to student attendance and the planned activities. The ACE program is funded through a federal grant, which pays the salary of the site coordinators and funds the hourly staff and some of the program activities.

Site coordinators select students for the program based on several factors, including recommendations from teachers, student test scores, and a tier system, developed by the ACE program, that considers academic need and the percentage of students classified as economically disadvantaged. The site coordinators contact the parents of candidates to offer these student a place in the program and to enroll interested students whose parents consent.

During enrollment, program staff survey parents about community and educational opportunities that they would be interested in the program providing. Additionally, program staff survey parents, students, and district staff about the operation of the program and the efficacy of its services. TEA requires the surveys as part of the program administration.

The ACE program must meet extensive requirements to receive continued funding. TEA requires site coordinators to administer surveys, meet specific attendance requirements, and track student behavior, attendance, and academics before and during program participation. This process is aided by a regional coordinator from TEA, who has regular meetings with the site coordinators about the program requirements and how the program can succeed.

FIGURE 10–2
GONZALES ELEMENTARY SCHOOL AFTERSCHOOL CENTERS ON EDUCATION (ACE) PROGRAM AVERAGE SEMESTER GRADE COMPARISON, SCHOOL YEAR 2018–19

	ALL ST	TUDENTS	ACE STUDENTS		
SUBJECT	FIRST SEMESTER	SECOND SEMESTER	FIRST SEMESTER	SECOND SEMESTER	
English language arts and reading	88.6	88.7	85.3	89.0	
Mathematics	86.8	86.2	83.4	82.9	
Science	94.7	94.9	94.2	93.9	
Social studies	94.6	94.2	93.8	92.9	
Source: Texas Education Agency, 21st C	entury Community Learni	ng Centers Cycle 10 – Year	One, school year 2018-	-19.	

FIGURE 10–3
GONZALES JUNIOR HIGH SCHOOL AFTERSCHOOL CENTERS ON EDUCATION (ACE) PROGRAM AVERAGE SEMESTER GRADE COMPARISON, SCHOOL YEAR 2018–19

SUBJECT	ALL ST	TUDENTS	ACE STUDENTS		
	FIRST SEMESTER	SECOND SEMESTER	FIRST SEMESTER	SECOND SEMESTER	
English language arts and reading	82.0	81.9	82.4	81.6	
Mathematics	81.4	82.3	82.5	84.2	
Science	83.3	84.1	83.6	84.7	
Social studies	84.5	83.5	84.2	83.9	
Source: Texas Education Agency, 21st C	entury Community Learnin	ng Centers Cycle 10 – Year	One, school year 2018-	-19.	

Although still in its early stages, Gonzales ISD's afterschool program has already improved outcomes for many students. The Gonzales Elementary School site, which has the largest number of students attending, has reported improvements during the first year of implementation in some student outcomes, including student behavior. Academic results have been more mixed during school year 2018–19, as shown in **Figure 10–2**, which shows ACE program average semester grades for each academic area, for this site from the first to the second semesters.

After one year of participation, the ACE students at the elementary level showed a significant improvement in their English language arts and reading grades. Although the mathematics average semester grades of ACE students decreased from the first to the second semester, the decrease was less for ACE students than for students overall.

The other two sites, which serve fewer students, have shown mixed results. However, the district has made staff changes and is collaborating with the regional coordinator to increase attendance and improve student outcomes. **Figure 10–3** shows the results for the ACE program at Gonzales Junior High School.

Despite mixed academic results, survey data indicate high satisfaction with the ACE program. Survey results are aggregated for all 10 ACE program sites throughout the state. The aggregated data from the survey indicate a high level of satisfaction with the program among staff, students, and parents. The majority of staff were satisfied or very satisfied by the class sizes offered in the program. A majority of students were satisfied or very satisfied with the homework assistance in the program, the enrichment opportunities offered, and the attention and care offered by teachers. A majority of students strongly agreed with the statement, "I look forward every day to attending ACE." A majority of students agreed that their behavior and attendance had improved since attending the ACE program. Parent survey responses reported high levels of satisfaction with the structure and quality of the program, and most parents agreed that their children's behavior and attendance had improved upon enrollment in the program.

Despite mixed academic results, the community has provided a great deal of positive feedback about the resources provided by the ACE program. The overall program has shown it benefits students and that the district has the tools and is putting in the effort to make this program a successful resource.

DETAILED FINDINGS

EDUCATION FOUNDATION FUNDS (REC. 43)

Gonzales ISD's education foundation and district administrators do not use or publicize available grant funds adequately.

The Gonzales ISD Education Foundation is a not-for-profit organization, as classified by the U.S. Internal Revenue Code, Section 501(c)(3). The purpose of the foundation is to fund grants to support the needs of Gonzales ISD teachers. The superintendent is a board member of the foundation, as are two members of the Gonzales ISD Board of Trustees. A district liaison communicates with the president of the foundation.

The foundation raises funds through an annual fund-raising campaign and events held throughout the year. The foundation has consistently self-funded its ongoing needs and has raised thousands of dollars each year for district purposes. During school year 2018–19, the foundation raised \$62,032 and disbursed \$10,102 to teachers through grants. Staff said that few teachers applied for grants during that school year, even though most applicants received a grant award. Grant applications and awards increased during school year 2019–20, when the foundation raised \$59,252 and awarded \$32,113 to teachers in grants. Staff attributed the increase in applications to new district leaders informally communicating to campuses that these funds were available. However, these staff acknowledged that significant funds remained unused for the year.

The foundation provides funds to the district solely through teacher grants. Teachers are expected to take the initiative in applying for grants. No campus-driven or district-driven process connects teachers with the program or assists them in completing the application. Although the district conducts an annual mandatory meeting for teachers, the district has no formal measures to promote the teacher grants or to stimulate interest by recognizing successful implementation of grant resources.

The teacher grants application process begins in October each school year. Teachers can identify needs in their classrooms and submit a six-page application form to the foundation. The application must be signed by the campus principal and the director of technology if the application pertains to technology or media equipment. The applicant specifies the amount requested; the expected number of students, parents, or teachers that will be affected by the use of the requested funds; and whether the project previously

has been funded. Finally, the applicant describes the need being met, how the project will affect student learning, and the indicators for evaluating the successful implementation of the grant.

A selection committee composed of foundation members scores the completed applications through a rubric that evaluates the application's thoroughness in meeting several criteria. These criteria include a clearly stated need that supports district goals, a thorough evaluation strategy, and the inclusion of parent, community, and business partners in the project. The foundation does not require a specific score for an application to be granted; rather, the selection committee makes the determination using the rubric as a discussion point. The vice president of the foundation said that most applications are granted if the application provides sufficient information.

The foundation does not provide the grants to students or administrative staff. Additionally, the foundation does not provide support to the district outside of teacher grants. Staff said that using foundation funds to support the district in ways other than through grants to teachers had been considered by the foundation, but had not been implemented.

During its mandatory meeting with teachers shortly before the grant application window opens, foundation representatives remind teachers of the availability of funds and inform them of the application process. This reminder is the only formal outreach the foundation and district staff perform to encourage participation. The foundation uses its social media account to regularly post updates about fund raisers, recognize financial supporters, and inform the public about ways to support the foundation. The only promotion on the account for the grant program during the past application cycle was a reminder to teachers about the mandatory meeting. The district and individual campuses do not currently use their social media accounts to promote foundation grants.

Although the current version of the application requires the director of technology's signature, previous versions did not. Technology staff said that nonstandard technology purchased without their input has been an issue in the past. Integrating systems that were not intended to work together has reduced efficiency and frustrated some teachers and technology staff. Teachers have reported incidents in which a teacher utilized grant funds to purchase technology in the classroom that subsequently was removed by the Technology Department. The review team could not determine the

reason for the removal of the technology, but some teachers report that such incidents have discouraged them from applying for the grants.

The Gonzales ISD Education Foundation has developed significant relationships with local businesses and the community to raise funds for the district's teaching staff. During the past two years, however, the foundation has left significant sums of allocated funds unused. Without diversifying the methods of fund distribution, improving the accessibility of the application process, and promoting the grant program among teachers, the foundation will not be utilized to its full potential. Effective education foundations have consistent and expansive methods for distributing raised funds.

Gonzales ISD should help teachers access education foundation funds efficiently and extend the availability of grant funds to groups other than teachers.

Because teachers have not consistently applied for the funds, the district should request to coordinate with the foundation to increase teachers' awareness of the availability of funds, promote accessibility by assisting in completing the application process, and develop other useful methods of distributing the funds.

The district should utilize its social media accounts to promote past successful uses of foundation grants. Providing information to teachers about the positive effects of foundation grants may increase applications. The district should coordinate with the foundation to identify beneficial uses of grant fund and promote these success stories on its social media accounts. The district should train campus administrators in the application process so that they can connect teachers to that process when needs arise and assist them in completing the application successfully. The district also should make certain that relevant departments are involved in the planning for grant applications to ensure that applications received can be continued to be used within existing systems in the district, preventing incidents in which successful grants are implemented unsuccessfully.

Additionally, to maximize the usage of available funds, the district should coordinate with the foundation to extend the availability of grant funds to groups other than teachers, which could increase the number of applicants. Programs within the district could apply for funds to expand their services, students could apply for grants to help pay for postsecondary education, and administrators could apply for grants to improve services at the campuses.

Subsequent to the review, the district indicated that the recommendation was accomplished prior to the 2020-21 school year. After various conversations on behalf of the staff, the director of PR and the superintendent convened with the Gonzales Education Foundation committee to discuss the possibility of expanding the grant process to be open for individuals or teams of individuals that are employed the Gonzales ISD who are involved in the instruction of students or related support services benefitting students. This widened the group of individuals who are eligible to apply for grants from previously being open only to teachers to individuals such as instructional coaches, campus administrators, counselors, and specials services individuals. The grant process was also revised after the Education Foundation asked and took into consideration feedback on the grant process by district staff. Changes were made to the entire grant process to provide additional opportunities for submission with more simplified procedures. Major changes include the following three examples:

- previously mandatory in-person grant workshop meetings were replaced with an instructional video explaining the changes and new features of the application;
- the grant application process was provided in a digital format, which provides additional opportunities for more individuals to apply; and
- instructional videos and guidelines were provided to ensure that the grants would be rated and awarded earlier during the school year than in previous years.

The district could implement this recommendation with existing resources.

PARENT AND COMMUNITY INVOLVEMENT (REC. 44)

Gonzales ISD does not plan and oversee its parent and community involvement efforts effectively.

Gonzales ISD posts a volunteer application form on its website and descriptions of volunteer opportunities, such as tutoring or mentoring students and assisting in the classroom or the library. Parents or community representatives that are searching for information about available volunteer opportunities also can find email and phone contacts for each campus through the website. The Student Handbook provided to all parents encourages volunteering and contains a phone number to contact for more information.

FIGURE 10–4
GONZALES ISD VOLUNTEERS BY CAMPUS
SCHOOL YEARS 2016–17 TO 2018–19

CAMPUS	GRADE LEVELS	2016–17	201 <i>7</i> –18	2018-19
Gonzales High School	9–12	N/A	N/A	15–20
Gonzales Junior High School	7–8	N/A	3–5	3–5
Gonzales North Avenue Intermediate School	5–6	N/A	10–15	3–5
Gonzales Elementary School	3–4	N/A	N/A	0
Gonzales East Avenue Primary School	1–2	25–35	25–35	25–35
Gonzales Primary Academy	Prekindergarten to kindergarten	45–55	50-60	50-60
Source: Gonzales ISD, March 2020.				

Nevertheless, Gonzales ISD has very low parent and community involvement on its campuses. District data indicate that some campuses only began roughly tracking the number of volunteers during school year 2018–19. **Figure 10–4** shows the number of volunteers by campus for the past three years, if data were available.

The numbers provided for most campuses are estimates. Most volunteering reportedly occurs at the elementary campuses, with another small increase at the high school level. Although information is not available for all prior years for many campuses, these numbers are not increasing significantly at the campuses that routinely have estimated their volunteer populations.

During focus groups with parents and teachers, participants reported very little involvement of parents through volunteering efforts. Focus group participants said that most campuses rely upon a small number of recurring parent volunteers; however, most parents remain uninvolved. Another factor that might reduce the willingness of parents to volunteer is that some parents report not feeling welcome at all campuses. Some parents said that, although teachers may encourage parents to come to specific events, they do not request or indicate that volunteering with programs or in the classroom would be welcome. Parents who had participated in volunteer activities reported that there is no training to encourage them to assume regular, meaningful roles in volunteering, and that suggested volunteer activities often involve chores such as setting up for events or cleaning up afterwards.

Staff and parents reported a few community and parent programs on some campuses. For example, the local Master Gardeners association regularly meets with grade 2 students at the Gonzales East Avenue Primary School as a part of the curriculum to promote students' knowledge of plant growth and cycles. The program was initiated through outreach from the campus and is not replicated on any other campus. Another campus had cultivated the Watch Dads of Great Students (Watch DOGS) program, which is intended to foster a safe learning environment and provide positive male role models for students. However, parents said during interviews that the volunteer leadership for the program had changed, and parents did not know whether the program still operates.

The district has developed a parent and family engagement plan that sets goals to increase family involvement but that has not been fully implemented. These goals range from specific items, such as including volunteer information in the Student Handbook and providing required Title I training to campus administrators, to more general concepts, such as developing "initiatives [that] emphasize the importance of family engagement." The plan's success will be assessed by surveys administered to parents. During a focus group, most parents reported that they had never seen or received a survey. When the review team surveyed parents to collect data about the district, 12 parents responded, which district staff considered a good response rate compared to their experience after sending prior surveys.

Three of the district's six campuses, Gonzales Primary Academy, Gonzales East Avenue Primary School and Gonzales Elementary School, have parent—teacher organizations (PTO). The other campuses do not have formal associations for encouraging parental involvement on campus. PTO leadership reported that existing associations have very low parental engagement and morale. The PTO leaders added that campus leadership provide little encouragement, and PTO groups form sporadically

and often disband when parents and their children advance to other campuses. Communication among the campus leadership and the PTO is limited to requests from campus leaders for the PTO to provide specific services or meals for events, and the PTO leaders occasionally are involved in discussions with the campus improvement committee. PTO leaders cited examples when campus leadership did not respond to requests for assistance in operating the PTO during leadership transitions. Parents reported that campus and district leadership do not promote membership in the PTO, and that attempts by the PTO to increase membership, such as setting up PTO enrollment tables at school events, have been unsuccessful overall.

The lack of district and campus coordination and encouragement has reduced parental and community involvement to a minimum. Because the district does not adequately track and compare parental involvement at campuses, it may not be aware of the gap that exists between actual parent and family engagement at Gonzales ISD and district's stated goals in this area. Staff indicated that existing PTOs and similar programs have small membership and low morale due to a lack of campus support and assistance in continued development.

Studies have shown that the presence of volunteers on school campuses helps to develop a supportive and welcoming environment. When adult volunteers are present, students' belief in the priority of education is strengthened. Research indicates that the involvement of families in campuses through volunteering or through the PTO is connected to improved attendance, graduation, and higher education rates in students.

Gonzales ISD should coordinate district-level and campuslevel support to promote parental and community involvement and make existing programs more accessible to volunteers.

A district seeking to increase and maintain volunteer services should provide several forms of coordinating assistance. In keeping with this best practice, Gonzales ISD should amend the job descriptions of certain district and campus staff to include the management and coordination of volunteer efforts. The district already has identified possible contacts for this purpose, but it should assess that list to determine whether those are the appropriate staff to coordinate and assist volunteer efforts at each campus and the district. After the district assigns volunteer coordinators, they should establish ways to

encourage increased participation by promoting volunteer opportunities and PTO membership at campus and district events. This promotion can include reminders that these opportunities exist and by recognizing specific examples of meaningful volunteer opportunities and past volunteers that have made positive contributions at the campus level or individual level.

The volunteer coordinator at each campus should manage a volunteer recognition program that welcomes and promotes volunteer efforts in the district. The district can recognize volunteers through class thank-you cards, social media shout outs, or certificates.

Additionally, the volunteer coordinator should conduct regular leadership outreach and training activities to identify parents that are interested in leading campus volunteer efforts and to assist them in developing outreach organizations, such as PTOs. These activities should occur during a regular cycle to ensure that leadership is being identified and added consistently, even as parents and students advance through the school system.

Finally, the district should develop a communication system for volunteer coordinators to share working strategies and programs regularly. This system should encourage the development and continuation of helpful programs.

The district could implement this recommendation with existing resources.

COMMUNITY COMMUNICATION (REC. 45)

Gonzales ISD lacks consistent communication about campus events with the community.

Gonzales ISD has a district website and sites for each of its six campuses. The director of PR updates the district website, and each campus principal maintains and updates the campus websites. The director of PR said that the district has compiled website information that is required to be posted for the community, which principals use as a resource to check that each website contains required information at the beginning of the school year. After that point, the director of PR makes updates as changes are presented to the district. The district has no formal schedule for updating the main website throughout the school year, nor are there requirements for campuses to follow a specific schedule or required list of postings. Before the director of PR role was established at the beginning of school year 2019-20, the Technology Department maintained the information on the website.

FIGURE 10–5
GONZALES ISD WEBSITE COMPLIANCE
SCHOOL YEAR 2019–20

POSTING	STATUTE	REQUIREMENT	GONZALES ISD
Testing for Home- schooled Students	The Texas Education Code, §29.916(c)	Requires a school district to post the dates that PSAT/ NMSQT or any college advanced placement test will be administered, the availability of the exams to home-schooled students, and the procedures to register for the tests.	Not found on the district website
College Credit Programs	The Texas Education Code, §28.010(b)	Authorizes a school district to post a notice regarding the availability of college credit programs in the district.	Not found on the distric or Gonzales High School websites
Immunization Awareness	The Texas Education Code, §38.019	Requires a school district to post in English and Spanish: a list of immunization requirements and recommendations, a list of health clinics in the district that offer influenza vaccine, and a link to the Texas Department of State Health Services website providing procedures for claiming an exemption from requirements in the Texas Education Code, §38.001.	Not found on the distric website or campus websites
Physical Education Policies	The Texas Education Code, §28.004(k)	Requires a school district to post information regarding its school health advisory council and policies to promote the health and physical fitness of students.	Not found on the district website or individual campus websites
Transition and Employment Guide for Special Education Students	The Texas Education Code, §29.0112	Requires districts to post the employment and transition guide for students served by special education developed by TEA in collaboration with the Health and Human Services Commission.	Not found on the district website or individual campus websites.

The district and campus websites were missing many items that are required to be posted by state law. **Figure 10–5** shows required postings that Gonzales ISD does not provide.

According to Gonzales ISD, the Testing for Home-schooled Students, College Credit Programs, Immunization Awareness and the Transition and Employment Guide for Special Education Students sections have been updated on the districts website subsequent to the March 2020 review.

The review team observed additional information on campus websites that is not updated consistently or easily accessible. Some campus websites have a section labeled Teachers from which the user can find information about each teacher, including a teacher's biography, schedule, and classroom rules, for example. However, the Teachers page on the website for Gonzales High School contained only one teacher's page, and Gonzales Elementary School's website instead had a link to the district's staff directory, which includes the teachers' names and email addresses.

The review team also observed that certain websites were not updated with pertinent information. For example, the Student Activities page on the Gonzales High School website links to information about various clubs and associations for students at the campus. However, further navigation from these links leads to information that has not been updated. For example, the page labeled Academic UIL provides some information for parents and students about the staff involved and an overview of the program; however, subsequent links on that page, including those for schedules and forms, are linked to blank pages. Other campuses, such as Gonzales Elementary School, have no information provided on the Academic UIL page.

In addition to websites, the district and campuses also have social media accounts to keep the community informed of upcoming events. As with the websites, the director of PR manages social media at the district level, and each campus is responsible for its own social media outreach. The district has no guidelines for campuses to follow in posting to social media regarding content, information that needs to be regularly presented, or a posting schedule. The district implemented a regular internal newsletter called the Smoke Signal during school year 2018–19 to inform district staff about activities and important information at the campus

level. However, this communication is not available to the community or to parents.

During interviews, parents reported that it can be difficult to learn about events at campuses because their websites are not updated consistently. Some campuses maintain certain forms of social media accounts to maintain contact with parents and inform them of events. Parents said that this manner of communication makes it difficult for those who choose not to have certain social media accounts or have no regular access to social media to receive updates about school events.

Parents said that they sometimes participate in group chat rooms for specific classes or clubs in which their students are enrolled. These group chat rooms, they agreed, typically were updated and provided opportunities for parents to ask questions and receive clarification. Some parents noted, however, that they missed updates because these group chat rooms were not available for every class, club, or for the campus as a whole.

Without consistent and accessible ways to keep parents and the community informed of campus events and opportunities, the district risks underutilizing these resources. An outdated website limits the district's potential to engage and inform the community, publicize district successes, and increase parental communication and involvement. Additionally, a district or campus website that is noncompliant with statute presents potential risks to the district for not providing full disclosure to the public.

Without social media guidelines, district communications through these channels are likely to lack consistency and vision. If the district does not update its social media accounts regularly with important information, parents and community stakeholders cannot use these communication tools as a reliable source of district and campus news.

The Texas Association of School Business Officials (TASBO) maintains a listing of all the Texas Education Code and other governmental agency requirements regarding information that school districts must post to their websites. This information is available on TASBO's website and is updated regularly.

The National School Public Relations Association published a report titled *School Communication Benchmarking Project: Rubrics of Practice and Suggested Measures* in 2014 that includes rubrics for assessing a school district's progress in the following areas:

• comprehensive professional communication program;

- internal communications;
- · parent and family communication; and
- · marketing and branding schools.

Each area includes an assessment of social media, using a three-point scale that denotes emerging, established, and exemplary practices. An exemplary level of effective engagement that targets audiences through social media includes the following recommended practices:

- usage, monitoring, and strategies for social media channels are incorporated within the overall communications plan and are coordinated by the school communications department;
- selection and usage of social media are based on researched audience preferences and profiles;
- social media use spans a range of district communications; audiences are encouraged to interact with the district via social media;
- clear, ongoing proactive coordination exists among staff in the district who have posting rights; the team of staff with posting rights meets regularly;
- board policies regarding social media are shared with students, parents, staff, and the public via multiple mechanisms, such as the district website, social media channels, student handbooks, and staff manuals; and
- goals established for attaining views or interaction are aligned with the district's communications plan; the leadership team tracks results and adjusts strategies accordingly.

Gonzales ISD should improve communication about campus events with parents and the community to include regular updates to the district's websites and a consistent social media policy.

The director of PR should develop guidelines for campus social media posting and task one staff at each campus to update the main social media outlets. Guidelines should include goals for posting positive news stories and timely information, such as when officials delay the start time of classes due to inclement weather. The superintendent should review the plan and request that principals identify several staff at each campus to assign campus-level portions of the plan. Designated campus staff should coordinate with the

director of PR regarding any public inquiries made through the social media sites. The director of PR should regularly compile data on the campus postings and the number of followers for each type of social media and share the report with the superintendent and the board.

Because not all parents have access to social media accounts, the director of PR also should develop and implement written procedures to update the district's website and campus websites, including required information. These procedures should include establishing regular schedules to ensure that the information on the website is current. The director of PR also should regularly check TASBO's list of district website posting requirements for updates and ensure that the district is meeting all of them.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATION

During the onsite visit, the review team observed an additional issue regarding the district's programs and services to students, staff, and the community. This observation is presented for consideration as the district implements the report's other findings and recommendations.

The district has developed many business and community partnerships to support it in various ways. Although some of the programs within the district track their own donation records to avoid duplicating or frequently repeating requests, the district does not have a centralized source to track donation requests and outreach. During interviews with community stakeholders, representatives of some businesses reported receiving repeated and persistent donation requests beyond available capabilities. Gonzales ISD should consider developing a centralized process for updating and tracking donation requests and community outreach initiatives.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.