



LEGISLATIVE BUDGET BOARD

Bloomington Independent School District Management and Performance Review

PREPARED BY LEGISLATIVE BUDGET BOARD STAFF

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JUNE 2022

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CONTENTS

| | |
|---|-----------|
| EXECUTIVE SUMMARY | 1 |
| 1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT | 9 |
| 2. EDUCATIONAL SERVICE DELIVERY | 27 |
| 3. BUSINESS SERVICES MANAGEMENT | 37 |
| 4. HUMAN RESOURCES MANAGEMENT | 49 |
| 5. TRANSPORTATION MANAGEMENT | 63 |
| 6. FACILITIES AND SAFETY MANAGEMENT | 71 |
| 7. INFORMATION TECHNOLOGY MANAGEMENT | 85 |
| 8. FOOD SERVICE MANAGEMENT | 93 |

EXECUTIVE SUMMARY

LEGISLATIVE BUDGET BOARD SCHOOL PERFORMANCE REVIEW

The Texas Legislature established the Texas School Performance Review in 1990. The Texas Government Code, Section 322.016, authorizes the Legislative Budget Board (LBB) 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 [of trustees] 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 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 that identify accomplishments, findings, and recommendations based upon the analysis of data and onsite study of each district’s operations. A comprehensive review examines educational, financial, and operational 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 the Texas Education Agency (TEA), the Texas Department of Agriculture, and the Texas School Safety Center. For the Bloomington Independent School District (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 observations with district and campus administrators, staff, and board members.

BLOOMINGTON ISD

The School Performance Review Team conducted an onsite visit of the Bloomington ISD in October 2021.

The review team identified 36 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.

Bloomington ISD is located in Victoria County and serves the communities of Bloomington and Placedo. The district is served by regional Education Service Center III (Region 3). The state legislators for the district are Senator Lois Kolkhorst and Representative Geanie Morrison.

During school year 2020–21, Bloomington ISD’s enrollment was 885 students, served by 63.0 full-time-equivalent teacher positions. The district operates five campuses, including two elementary schools, one middle school, one high school, and an alternative high school. During school year 2020–21, the student population in Bloomington ISD was 85.1 percent Hispanic, 10.3 percent White, 3.5 percent African American, and 1.1 percent two or more races. Additionally, 99.8 percent of the student population were identified as eligible for meals provided through Title I funding, and 82.6 percent were identified as economically disadvantaged.

Mark Anglin began his tenure as superintendent of Bloomington ISD in September 2019. Before taking this leadership role, the district experienced significant issues with previous administrators that negatively affected the financial and operational functions of the district and the safety of the staff. The previous superintendent resigned while being investigated by the district for alleged sexual harassment of staff. The district’s internal investigation concluded that this administrator acted inappropriately toward staff in the workplace. Interviews with staff also indicated that in January 2020 the district’s chief financial

FIGURE 1
BLOOMINGTON ISD STATE ACCOUNTABILITY RATINGS
SCHOOL YEARS 2014–15 TO 2018–19

| DISTRICT/CAMPUS | 2014–15 | 2015–16 | 2016–17 | 2017–18 | 2018–19 (1) |
|-------------------------------|----------------------|----------------------|----------------------|---------------------------------------|-------------|
| District | Met Standard | Improvement Required | Met Standard | Not Rated: Hurricane Harvey Provision | D |
| Bloomington High School | Met Standard | Met Standard | Met Standard | Not Rated: Hurricane Harvey Provision | D |
| Bloomington Middle School | Improvement Required | Improvement Required | Met Standard | Met Standard | D |
| Bloomington Elementary School | Met Standard | Improvement Required | Improvement Required | Met Standard | F |
| Placedo Elementary School (2) | Met Standard | Met Standard | Met Standard | Met Standard | F |

NOTES:

- (1) The Legislature phased in a new accountability rating system for Texas public schools during this period. During school year 2017–18, school districts received an alphabetical rating, and during school year 2018–19, districts and campuses received alphabetical ratings.
- (2) Placedo Elementary School received a paired rating with Bloomington Elementary School for school year 2014–15 and a paired rating with Bloomington High School for school years 2015–16 and 2016–17.

SOURCE: Texas Education Agency, School Accountability Ratings, school years 2014–15 to 2018–19.

officer was terminated for allegedly misusing thousands of dollars of district funds. Additionally, a separate audit of the district's finances was conducted in September 2019, immediately after the current superintendent joined the district. According to the current superintendent, the audit revealed that the district may have misused up to \$500,000 in federal funding; as a result, the case was submitted to county authorities, which are investigating these findings. As a result of these improprieties, Superintendent Anglin has faced extreme challenges and had limited resources to implement solutions to address them.

FINANCIAL OVERVIEW

For school year 2020–21, Bloomington ISD adopted a budget of approximately \$11.3 million. For school year 2019–20, Bloomington ISD's total actual expenditures for all funds were \$12,785,670. Bloomington ISD's actual operating expenditure per pupil during school year 2019–20 was \$13,934, compared to the state average of \$10,406. During school year 2019–20, Bloomington ISD spent approximately 54.6 percent of total actual operating expenditures for instruction compared to the state average of approximately 57.0 percent.

The district's total fund balances decreased by 32.8 percent from school years 2017–18 to 2019–20, with a total fund balance for school year 2019–20 less than \$1.0 million.

Bloomington ISD's School Financial Integrity Rating System of Texas rating was C/Meets Standard for school year 2020–21. 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 2020–21. See the **Business Services Management** chapter for more information about these rating systems.

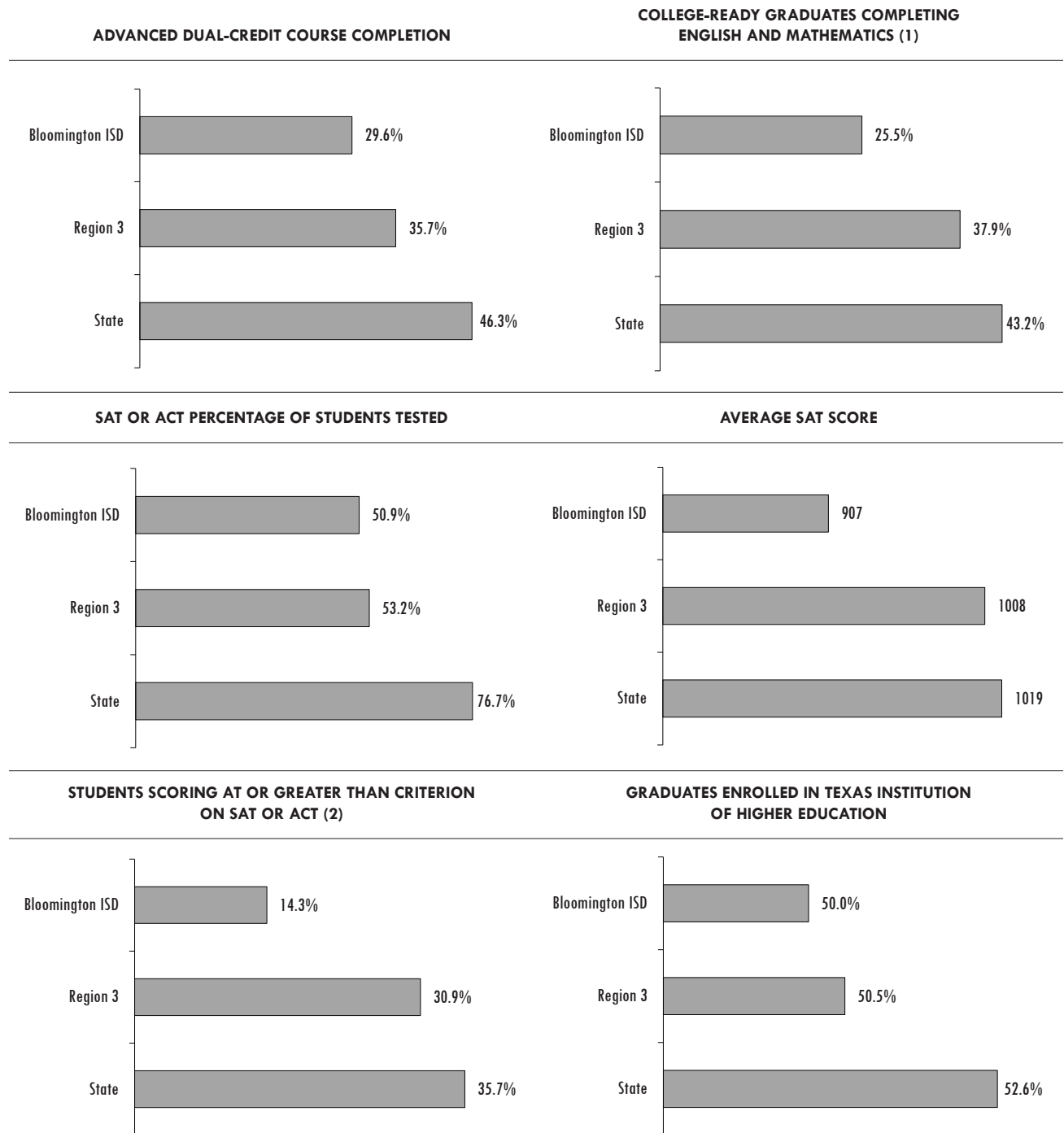
EDUCATIONAL OVERVIEW

TEA issues state accountability ratings for each district and campus; however, TEA did not issue ratings for school years 2019–20 and 2020–21 due to the COVID-19 pandemic. For school year 2018–19, the most recent year that the state issued accountability ratings, the district received an overall rating of D, with individual campuses receiving ratings of Ds and Fs. In school year 2017–18, Bloomington ISD and Bloomington High School were not rated due to a provision applicable to districts directly affected by Hurricane Harvey. For the three previous school years, the district and its campuses received varying ratings of Improvement Required and Met Standard.

Figure 1 shows the state accountability ratings for Bloomington ISD's campuses from school years 2014–15 to 2018–19. The district's accountability ratings were inconsistent during this period, but either the district or individual campuses failed to meet expectations in each year that all campuses received ratings.

Figure 2 shows secondary education academic measures for Bloomington ISD compared to the averages of other school districts in Region 3 and the state. Bloomington ISD's academic performance is lower than regional and state averages for all measures.

**FIGURE 2
BLOOMINGTON ISD STUDENT ACADEMIC MEASURES COMPARED TO REGIONAL EDUCATION SERVICE CENTER III (REGION 3)
AND STATE AVERAGES
SCHOOL YEAR 2020–21**



NOTES:

- (1) To be considered college-ready, a graduate must have met or exceeded the college-ready criteria on the State of Texas Assessments of Academic Readiness (STAAR) end-of-course examinations or the SAT or ACT standardized college admissions tests.
- (2) Criterion refers to the scores on the SAT and ACT college admissions tests.

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

ACCOMPLISHMENTS

During its review, the LBB School Performance Review team identified noteworthy accomplishments resulting from the district's best practices. Subsequent chapters discuss nine district accomplishments, including the following practices. Many of the district's accomplishments are related to efforts among district administrators to improve accountability and oversight and to implement processes that improve financial operations and decrease the likelihood of future improprieties.

BOARD OF TRUSTEES GOVERNANCE

According to board members and district staff, lack of sufficient oversight contributed to the district facing numerous challenges and alleged improprieties. To address this serious concern, the superintendent and board decided collectively to engage in the Lone Star Governance (LSG) program beginning in February 2020. LSG is a training initiative offered through TEA that provides coaching and support through a continuous-improvement framework for school governance entities to focus on student success. LSG aligns board members' conduct with research-based behaviors and provides a system for assisting board members in improving their governing and fiscal responsibilities.

STUDENT BEHAVIOR MANAGEMENT

Bloomington ISD has implemented behavior management models that staff report have improved student behavior and lowered recidivism, which in recent school years has been a significant issue in the district and an obstacle to student learning. The district established a behavior coordinator position to manage discipline referrals at the secondary level and provided training to staff in the use of Restorative Discipline practices and interventions to respond to challenging behaviors. Both elementary schools also have implemented social and emotional learning programming, and Bloomington Elementary School uses the Positive Behavioral Interventions and Supports model to teach students positive behavior strategies. According to staff, these behavior management programs have built a sense of community at the campuses.

BUSINESS SERVICES PROCESSES

Bloomington ISD has implemented two best-practice financial processes that help the district identify and prevent fraud, improve operations, and protect district resources. Bloomington ISD requires the digitization of paper receipts and supporting documentation when staff make purchases. This process reduces the district's risk of fraud, significantly

decreases the use of paper, and enhances the district's ability to store documents safely. Bloomington ISD also contracts with Region 3 to perform bank account reconciliation to segregate duties in its Business Office, which has few staff. Bank account reconciliation, which involves reviewing and checking all transactions recorded in bank statements, is an essential internal control tool necessary in preventing and detecting fraud.

FOOD SERVICE FINANCIAL OPERATIONS

Bloomington ISD's Food Service Department maximizes federal support of its child nutrition programs by implementing best practices for conducting direct certification in accordance with the federal Community Eligibility Provision and effectively maximizes use of U.S. Department of Agriculture Foods to reduce food costs. These practices improve the financial health of the department and decrease the likelihood that the district would require general funds to subsidize food service operations.

FINDINGS AND RECOMMENDATIONS

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

- (1) Planning;
- (2) Organization and staffing;
- (3) Oversight and evaluation; and
- (4) Policies and procedures.

PLANNING

Planning is an ongoing and essential process employed by effective school districts, which assists them to identify long-term needs, allocate the best use of resources, and implement stakeholder goals. The review team found many opportunities for the district to guide its operations more effectively through improved planning.

Two important sets of plans developed by school districts are the district improvement plan (DIP) and the campus improvement plans (CIP). These required documents are annual plans intended to guide school district staff in the improvement of student performance. However, Bloomington ISD lacks a process to develop and administer its DIP and CIPs effectively.

Additionally, the district lacks a comprehensive, multiyear strategic planning process that sets

measurable goals, addresses the long-term needs of all areas of the district, and directs the use of district resources. The lack of an effective process for long-term planning to guide its campuses, departments, and programs reduces the district's ability to address unforeseen events, allocate resources to achieve goals, or establish accountability standards.

Furthermore, Bloomington ISD does not have a formal curriculum management plan, nor a process to develop, adopt, and monitor such a plan. A curriculum management plan is a systematic, defined program of a district's curriculum development, implementation, assessment, and evaluation. The lack of this plan hinders the district's ability to guide, support, and monitor curriculum and instruction effectively.

Bloomington ISD does not plan adequately for facilities management and future facility needs. The district lacks a long-range facility master plan, which would enable it to establish purpose, direction, and priorities regarding facilities management and assist the district to utilize assets more effectively.

Bloomington ISD also lacks key operational plans, including a long-range technology plan, cybersecurity plan, and disaster recovery plan.

The following recommendations would assist the district's planning:

- establish procedures to coordinate development and implementation of the DIP and CIPs that include a defined calendar for implementation, site-based decision-making committees, and required progress reporting;
- develop a three-year to five-year comprehensive strategic plan with measurable objectives to align all areas of district operations and serve as a framework for district decision making;
- establish a process to develop, implement, and revise a curriculum management plan;
- establish a five-year facilities master plan and update the plan annually; and
- develop a long-range technology plan, a cybersecurity plan, and a technology disaster-recovery plan, and update these plans regularly.

ORGANIZATION AND STAFFING

An effective organizational structure and efficient staffing are essential to maintaining a high-functioning school district. It is important to balance the overall workload of an administrator between manageable supervisory responsibilities and other executive duties. Employing experienced and highly qualified leaders and instructional staff can enhance the financial, educational, and operational performance of the district and improve student achievement.

Bloomington ISD does not have an effective and efficient organizational structure relative to the superintendent's supervisory responsibilities. The superintendent has 18 directly reporting positions, compared to superintendents at peer districts that have from six to nine directly reporting positions, which is consistent with best practices for executives. Peer districts are districts similar in size and other characteristics to Bloomington ISD that are used for comparison purposes. An effective distribution of duties enables the superintendent to focus on critical strategic initiatives that contribute to the district's overall success. However, the Bloomington ISD superintendent's extensive supervisory responsibilities diminish the time available for other key executive duties, such as district planning and district goal setting. By placing so many responsibilities on the superintendent, the district's performance depends overwhelmingly on the leadership and guidance of one individual. Despite strong staff support for the superintendent's leadership, the current organizational structure places the district at risk for long-term inefficiency and dysfunction if the superintendent leaves his position.

Additionally, Bloomington ISD lacks a comprehensive plan to recruit and retain qualified teachers. Inability to fill district positions with qualified staff can reduce educational and operational effectiveness and efficiency.

The district also does not have a dedicated human resources (HR) department or positions dedicated solely to HR responsibilities, so various district and campus staff perform HR activities. As a result, some HR responsibilities are not conducted effectively, and some duties are omitted.

The following recommendations would assist the district's planning and budgeting:

- modify the district's organizational structure to decrease the superintendent's supervisory responsibilities and reassign the superintendent's duties that extend beyond those specified in board policy and state law;

- establish a comprehensive recruitment and retention plan that explores sustainable, innovative options and incentives for recruitment and retention of qualified teachers; and
- add dedicated HR staff and define, document, and communicate all HR roles and responsibilities for staff with HR duties.

OVERSIGHT AND EVALUATION

Although Bloomington ISD has made positive changes and noteworthy accomplishments related to oversight, the district has a continued need to implement or strengthen processes for oversight and evaluation. This area is key to determining the effective development and implementation of the district's programs and processes.

In the area of contract management, Bloomington ISD lacks a process to ensure effective evaluation and oversight of district contracts. The district does not have a centralized, master file of original contracts; lacks a process for reviewing contracts; does not maintain a contract renewal calendar; and has not designated a contract manager. Failure to monitor contracts for compliance and to conduct cost-benefit analyses of renewals increases the district's risk of overspending on services or not receiving the best value for its investments.

The district does not have effective oversight and evaluation of its career and technical education (CTE) program. CTE programs prepare students for high-skill, high-wage occupations that meet Texas labor market criteria for growth, annual job openings, and wages. The district offers four CTE programs of study for students, and the participation rate has decreased among graduates in recent school years. Bloomington ISD also does not have an advisory committee; a comprehensive, long-term plan; or a process to evaluate the CTE program's effectiveness regularly.

Additionally, community involvement activities are not monitored or guided sufficiently at the district level. Community involvement is an important element in operating a successful school district. Parent and community volunteers provide valuable resources, and research shows that family and community involvement in student learning improves their academic performance and helps students feel more confident at school and in performing more rigorous classwork. However, opportunities for community involvement are inconsistent among Bloomington ISD campuses, and the district does not perform needs assessments

or formal evaluations of stakeholder involvement in district and campus activities and programs.

Effective and efficient public school districts have measurable performance metrics to hold administrators and staff accountable for achieving goals. However, Bloomington ISD lacks processes and performance metrics to evaluate the effectiveness and efficiency of its HR activities and the district's Transportation Department.

The district also lacks sufficient oversight and monitoring of its multihazard emergency operations plan to ensure that all required components are completed and documented. This plan is a critical tool to protect student and staff safety during emergencies. Although district staff communicate the expectations for plan components to relevant district leaders, no staff effectively monitor that submissions are compliant, complete, or timely. Additionally, the district does not have effective oversight of emergency preparedness drills conducted by each campus.

The following recommendations would improve the district's oversight and evaluation:

- implement controls to improve contract management functions;
- establish a CTE advisory committee, develop a CTE plan, and evaluate the district's CTE program regularly;
- assess the existing operations and priorities of the district's community involvement function and adopt a centralized approach to overseeing community and stakeholder engagement;
- develop annual goals for each HR activity and establish performance measures to evaluate the effectiveness of the HR function overall;
- develop performance metrics to measure the effectiveness and efficiency of the Transportation Department; and
- update campus emergency operations plans and monitor plans and drills to ensure consistency and compliance with statutory requirements.

POLICIES AND PROCEDURES

School board policies set local priorities and align with state and federal laws and regulations. Effective procedures provide a framework for performing a district's operations effectively,

efficiently, and consistently. Texas school districts routinely develop operating procedures to guide their daily operations.

Although Bloomington ISD's board policies are updated and an external organization recently reviewed them, some areas would benefit from additional development. For example, the district has not developed a detailed fund balance policy that sets a target general fund balance. The fund balance represents the financial resources the district holds to address unforeseen issues; therefore, this policy is critical for supporting daily operations and providing adequate financial protection for the district. From school years 2017–18 to 2019–20, Bloomington ISD did not maintain TEA's recommended minimum unrestricted fund balance.

Additionally, the district lacks a policy for bus replacement, a large expenditure that is crucial for the safety and reliability of student transportation services. The average age of Bloomington ISD's buses is 17.3 years, which is 6.0 years older than the national average. Old school buses may not have current safety features, can be costly to maintain, and may not be compliant with current regulations.

Most departments in Bloomington ISD also lack documented procedures that describe all the duties required of staff and how staff are to perform critical functions. Staff typically receive verbal instructions on how to perform their duties and learn about informal procedures through on-the-job observation. When policies are implemented through informal procedures and institutional knowledge, districts risk ineffective or inconsistent practices and the loss of that knowledge through staff turnover. The rate of administrative-level turnover at Bloomington ISD has been high in recent years, and several director-level staff have limited experience or expertise; therefore, a lack of documented procedures is a significant obstacle to effective district operations.

Furthermore, the district lacks budget development procedures that align with district and campus improvement plans. Bloomington ISD's budget process is not defined in any formal document, and the district has no budget calendar that details the steps in the process and when they occur. Staff also reported that the budget process operates independently from the development of district and campus improvement plans. Failure to document the budget process and to align it properly with planning for student outcomes could lead to apathy in budget administration, preventable budget amendments, difficulty in providing sufficient oversight, inefficient or ineffective spending, and limits to the improvement strategies that the district can implement.

The following recommendations would improve the district's policies and procedures:

- establish a fund balance policy to protect the district's fund balance and ensure that it remains sufficient to address unforeseen events;
- develop a board policy to guide bus and white-fleet vehicle replacement and disposal based on the vehicle's mileage and age;
- develop and implement clear operating procedures and processes across each functional area of the district; and
- develop and implement a budget development process that incorporates input from campuses and departments and aligns with campus and district improvement plans.

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 2022–23 to 2026–27.

1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT

ACCOMPLISHMENTS

- ◆ Bloomington ISD’s Board of Trustees (board) and superintendent are engaged in improving the management and oversight of the district through the Lone Star Governance (LSG) program.
- ◆ Bloomington ISD’s board policies are updated and consistent with local priorities.

FINDINGS

- ◆ Bloomington ISD does not have an effective and efficient organizational structure relative to the superintendent’s supervisory responsibilities.
- ◆ Bloomington ISD’s board members do not complete all the training hours required by statute and board policy.
- ◆ Bloomington ISD lacks a process to effectively develop and administer its district and campus improvement plans.
- ◆ Bloomington ISD lacks a method to hold board members accountable for attending board meetings.
- ◆ Bloomington ISD lacks a comprehensive, multiyear strategic planning process that sets measurable goals, addresses the long-term needs of all areas of the district, and directs the use of district resources.
- ◆ Bloomington ISD lacks documented operating procedures and processes for efficient implementation of district operations.
- ◆ Bloomington ISD’s community involvement activities lack coordination and are delivered inconsistently.

RECOMMENDATIONS

- ◆ **Recommendation 1: Modify the district’s organizational structure to decrease the superintendent’s supervisory responsibilities and decrease the superintendent’s duties that extend beyond those specified in board policy and state law.**
- ◆ **Recommendation 2: Modify the school board’s continuing education training process to ensure that board members receive all required trainings.**

- ◆ **Recommendation 3: Establish procedures to coordinate development and implementation of district and campus improvement plans that include a defined calendar for implementation; site-based, decision-making committees; and required progress reporting.**
- ◆ **Recommendation 4: Amend the board’s operating procedures to increase board member attendance at board meetings.**
- ◆ **Recommendation 5: Develop a three-year to five-year comprehensive strategic plan with measurable objectives to align all areas of district operations and serve as a framework for district decision making.**
- ◆ **Recommendation 6: Develop and implement clear operating procedures and processes across each functional area of the district.**
- ◆ **Recommendation 7: Assess the existing operations and priorities of the district’s community involvement functions and adopt a more centralized approach to overseeing community and stakeholder engagement.**

BACKGROUND

An independent school district’s governance structure, staff management, and planning process provide the foundation for effective and efficient education of students. An elected board of trustees governs each school district in Texas. The board 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 resources to implement district priorities. The board and superintendent collaborate as a leadership team to meet district stakeholder needs.

A 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 both the unique characteristics of the school district and the community. A high level of community involvement plays a critical role in school improvement and accountability systems. Community members and volunteers provide valuable resources that can enrich and enhance the educational system. In turn, the community directly benefits from an informed citizenry, an educated workforce, and future community leaders.

Bloomington Independent School District (ISD) is located in Victoria County and serves the communities of Bloomington and Placedo. According to the U.S. Census Bureau, the community of Bloomington had a population of 2,082 in calendar year 2020, a decrease of 15.3 percent from 2010. The population of Placedo has decreased by 9.7 percent during the same period, from 692 in 2010 to 625 in 2020. In 2020, the median household income in Bloomington was \$31,091.

Figure 1–1 shows the demographics of the populations of Bloomington and Placedo.

During school year 2020–21, Bloomington ISD employed 151.3 full-time-equivalent staff positions, and the district had 885 students enrolled. The student population was 85.1 percent Hispanic, 10.3 percent White, 3.5 percent African American, and 1.1 percent reported as two or more races. The district has five campuses that include Bloomington Elementary School, Placedo Elementary School, Bloomington Middle School, Bloomington High School, and an alternative campus. Crossroads Connect Academy, the district’s alternative campus, offers students a nontraditional setting to complete supported, self-directed online instruction for those needing credit recovery, an accelerated pace, or a modified schedule.

The Bloomington ISD board is the policy-making body authorized by law to govern the district. The board has the following duties:

- adopting goals and objectives for the district;
- reviewing and acting on policies;

**FIGURE 1–1
DEMOGRAPHICS OF BLOOMINGTON AND PLACEDO
CALENDAR YEAR 2020 CENSUS DATA**

| RACE OR ETHNICITY | BLOOMINGTON | PLACEDO |
|------------------------------------|-------------|---------|
| Hispanic | 77.3% | 73.9% |
| White | 36.7% | 43.5% |
| African American | 4.9% | 2.4% |
| American Indian and Alaskan Native | 0.5% | 1.3% |
| Asian | 0.2% | 1.3% |
| Two or More Races | 25.6% | 28.2% |

NOTE: Race and ethnicity are considered separate and distinct identities within U.S. Census Data. Hispanic or Latino origin is considered an ethnicity in census data and is asked in a separate question from race. Therefore, percentages shown may not sum to 100.0 percent.

SOURCE: U.S. Census Bureau, 2020.

**FIGURE 1–2
BLOOMINGTON ISD BOARD OF TRUSTEES
SCHOOL YEAR 2020–21**

| MEMBER | ROLE | EXPERIENCE |
|----------------|----------------|------------|
| Deloris White | President | 5 years |
| Blanca Wallace | Vice President | 6 years |
| Joseph Nelms | Secretary | 2 years |
| E.R. Saenz | Member | 3 years |
| Tanya Asbury | Member | 1 year |
| Juan Diaz | Member | 1 year |

NOTE: One position was vacant as of October 2021.

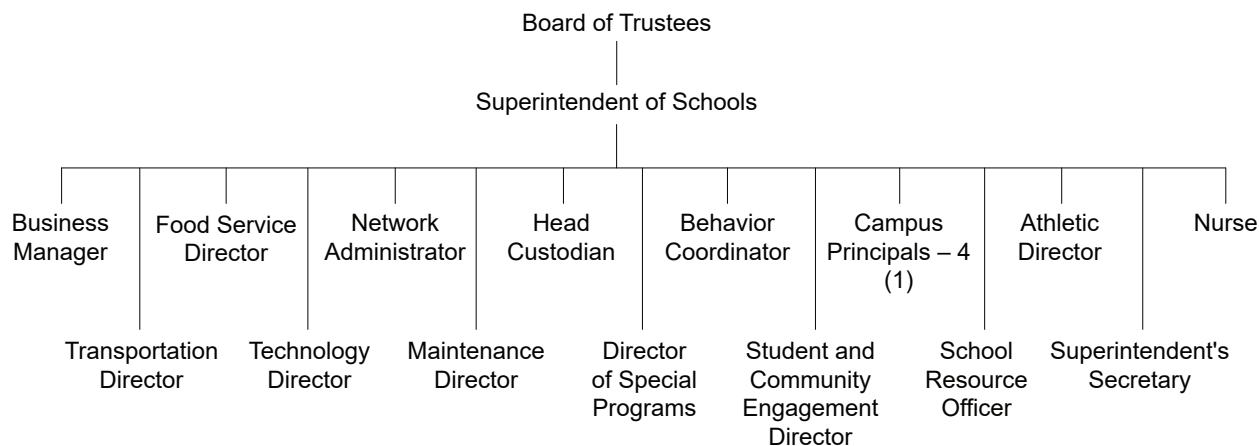
SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

- adopting an annual budget and setting the tax rate; and
- approving the hiring of school staff as recommended by the superintendent.

The seven-member Board of Trustees serves four-year terms, and elections are held every two years. The Legislative Budget Board’s (LBB) School Performance Review Team visited the district in October 2021. At the time of the onsite visit, one of the seven board positions was vacant. The trustee had resigned from the board to avoid violating the district’s nepotism rules when an immediate family member applied for employment in the district. **Figure 1–2** shows Bloomington ISD’s board members as of October 2021.

The district complies with the Texas Open Meetings Act by conducting monthly public board meetings facilitated by the

**FIGURE 1–3
BLOOMINGTON ISD ORGANIZATION
SCHOOL YEAR 2021–22**



NOTE: (1) The Crossroads Connect Academy principal is also the district’s curriculum administrator.
 SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

board president. Staff post public notification of board meetings on a bulletin board outside of the district’s central office and electronically on the district’s website. The board addresses personnel matters and other confidential topics in closed sessions as needed. The board typically meets at 7:00 PM on the third Monday of each month in the Board Room located at Bloomington Middle School. Board Policy BE (LOCAL) states that the district may call special meetings at the board president’s discretion or upon request by two board members. From January 2020 to November 2021, the district held 10 special meetings.

The public may attend all regular meetings and may address the board on topics of interest. Individuals who want to address the board or provide public comment must register with the presiding officer or designee before the meeting begins and indicate the topic of the presentation.

Bloomington ISD livestreams board meetings on the district’s social media and maintains an archive of board meeting minutes dating to September 2012 on the district’s website. The superintendent’s secretary typically takes the minutes of board meetings and distributes them in an email to Bloomington ISD board members for approval at the next board meeting.

Mark Anglin has been the Bloomington ISD superintendent since September 2019. The superintendent reports directly to the board, and 18 staff report directly to the superintendent.

Figure 1–3 shows Bloomington ISD’s organizational structure at the time of the LBB’s review.

Bloomington ISD’s parental and community involvement functions are conducted primarily by the individual campuses. The district does not have staff assigned to manage community relations at the district level. However, the high school student-and-community-engagement director has responsibilities that include communicating with the community for all campuses. The business manager responds to all public information requests made to the district.

The district’s school year 2020–21 District Improvement Plan (DIP) includes parental involvement among its five district goals, stating, “Bloomington ISD will annually promote, facilitate and enhance parent, student-and-community-engagement in district events and educational programs.”

The district communicates with parents and the community in several ways, including through the district’s website, social media, and through a messaging application that can send texts to parents’ phones. The district hosted several activities for the community during school year 2021–22, including open houses at campuses, a fall festival, and a family engagement event. Bloomington ISD encourages families to participate through volunteer programs, such as Head Start, Family Literacy, band boosters, and athletic boosters.

DETAILED ACCOMPLISHMENTS

LONE STAR GOVERNANCE PROGRAM

Bloomington ISD's board and superintendent are engaged in improving the management and oversight of the district through the Lone Star Governance (LSG) program.

During interviews, board members and staff acknowledged that the oversight and management of the district was ineffective during previous school years. This lack of oversight contributed to the district facing numerous challenges and alleged improprieties. One of these challenges is that the district's students have struggled academically. The state has not issued academic accountability ratings for school districts for the previous two school years during the COVID-19 pandemic. However, the last overall academic accountability rating for Bloomington ISD in 2019 was a D on a scale of A to F.

Additionally, the district faced investigations of professional and financial improprieties. According to staff and board member interviews, the previous superintendent resigned in July 2019 while being investigated by the district for allegedly sexually harassing staff. Interviews also indicated that in January 2020 the district's chief financial officer was terminated for allegedly misusing thousands of dollars of district funds. Additionally, a separate audit of the district's finances was conducted in September 2019, immediately after the current superintendent joined the district's employment. According to the superintendent, the audit revealed that the district may have misused up to \$500,000 in federal funding; as a result, the case was submitted to county authorities, which are investigating these findings.

Considering these circumstances, the superintendent and board members acknowledged that they needed to improve their stewardship of the district and student outcomes. Therefore, the superintendent and board decided collectively to engage in the LSG program beginning in February 2020. LSG is a training initiative offered through the Texas Education Agency (TEA), which provides coaching and support through a continuous-improvement framework for school governance entities to focus on student success. LSG aligns board members' conduct with research-based behaviors and provides a system for assisting board members in improving their governing and fiscal responsibilities.

After an initial two-day training, TEA assigned an LSG coach to assist Bloomington ISD's superintendent and board. The coach continues to provide regular support.

For example, the LSG coach has assisted the board in improving the effectiveness and efficiency of board meetings. The coach attends each board meeting and collaborated with board members to develop a self-assessment tool to improve the meetings' time management and organization.

Furthermore, before its participation in LSG, the district had no multiyear strategic planning process in place. However, in August 2021, the superintendent and board members developed a draft of a multiyear strategic plan with the assistance of the LSG coach. During onsite interviews, the superintendent and board members said that they are finalizing the strategic plan and will make it available to all Bloomington ISD staff and stakeholders during school year 2021–22.

BOARD POLICY

Bloomington ISD's board policies are updated and consistent with local priorities.

One of the primary responsibilities of a school board is to adopt local policies that guide how the district operates. District administrators and staff make important decisions based on district policies. It is essential for local school boards to adopt policies that are consistent with federal and state laws and regulations and to conform district practice to these policies.

At the time of the onsite visit, Bloomington ISD's school board local policies were updated. The Texas Association of School Boards (TASB) reviewed the district's policies in March 2021. Policy reviews assist districts to perform the following tasks:

- discover significant discrepancies between board policy and the student or employee handbook;
- clarify, revisit, or refresh its goals and objectives with staff and the board;
- determine if a district's administrative staff and board need training in policy manual development and maintenance; and
- examine whether campus practices are consistent.

TASB recommends that school districts engage in a thorough policy review and audit every five years to seven years, and the district has maintained this schedule. Bloomington ISD's use of the policy review process helps to ensure the efficiency of district governance.

FIGURE 1–4
BLOOMING ISD SUPERINTENDENT’S DUTIES, OCTOBER 2021

| DUTY | DESCRIPTION |
|---------------------------------------|---|
| Policy development and implementation | The superintendent advises the board of trustees regarding the need for new policies based on input from staff and advisory committees, legislators, and state agency staff. Following the superintendent’s policy recommendation, if the board adopts the policy, the superintendent develops and implements appropriate procedures to satisfy the new policy’s requirements. |
| Administration | The superintendent assumes administrative responsibility and leadership for the planning, organization, operation, supervision, and evaluation of the education programs, services, and facilities of a district and for the annual performance appraisal of the district’s staff. |
| Personnel | The superintendent recommends staff to be hired; is responsible for performance evaluations; and recommends the renewal, nonrenewal, and dismissal of staff, as provided by policy. |
| Budget | The superintendent prepares a budget, revises it as requested by the board, administers the board-adopted budget, and makes purchasing decisions as defined by board policy and budget constraints. |
| Facilities planning | The superintendent leads the administrative effort to plan for, operate, maintain, evaluate, and supervise improvements to school and district facilities. |
| Communication | The superintendent communicates with a diverse range of individuals and groups, such as legislators, the Texas Education Agency (TEA), the regional education service center, parents, board members, principals, attorneys, teachers, local business owners, and the media. The superintendent is the face of the district and works to build strong relationships with all these individuals to form beneficial partnerships and to lobby for the district. |
| Reporting | The superintendent ensures that reports are submitted on a timely basis as required by state or federal law, rule, or regulation, and ensures that a copy of any report required by federal law, rule, or regulation is submitted to TEA. |
| Educational leadership | The superintendent provides leadership and direction for the development of an educational system that is based on the needs of students, on standards of excellence and equity, and on community goals. |
| Planning | The superintendent implements and oversees a planning process that results in goals, targets, or priorities for all major areas of district operations. |

SOURCES: Legislative Budget Board School Performance Review Team, October 2021; Bloomington ISD Board Policy BJA (LEGAL) and BJA (LOCAL); the Texas Education Code, Section 11.201.

DETAILED FINDINGS

DISTRICT ORGANIZATION (REC. 1)

Bloomington ISD does not have an effective and efficient organizational structure relative to the superintendent’s supervisory responsibilities.

The role of a superintendent is broad and extensive. The superintendent is responsible for many district functions such as setting the district’s vision and goals, collaborating with the board, engaging the community, managing finances, serving as an instructional leader, and delegating daily activities that accomplish instructional and operational requirements. **Figure 1–4** shows some of the Bloomington ISD superintendent’s duties as described in Board Policy BJA (LEGAL), Board Policy BJA (LOCAL) and the Texas Education Code, Section 11.201.

Effective oversight of a school district requires a superintendent to manage his or her time and duties efficiently. However, Bloomington ISD’s organizational structure, shown in **Figure 1–3**, requires the superintendent to manage many staff, which decreases the remaining time available to carry out other crucial responsibilities. The superintendent directly supervises and evaluates 18 staff from seven functional areas, including educational service delivery, food services management, transportation management, safety and security and facilities, financial management, and information technology management. This structure does not consider the superintendent’s decision to decrease district expenditures for school year 2021–22 by appointing one individual as principal for the high school and middle school campuses. This decision might be reversed in subsequent school years, indicating that the

superintendent’s supervisory responsibilities would increase if another principal were hired.

Figure 1–5 shows the superintendent’s supervisory responsibilities at Bloomington ISD compared to those of three districts. Peer districts are districts similar to Bloomington ISD that are used for comparison purposes during the review.

Although the number of staff a supervisor can manage effectively varies by organization, a typical range for an executive’s supervisory responsibilities is from six to eight directly reporting positions. The number of positions reporting directly to Bloomington ISD’s superintendent is considerably higher than those of any of the peer districts and best practices.

In addition to his supervisory duties, Bloomington ISD’s superintendent also is involved in many operations of the district that exceed the scope of typical superintendent duties. These duties include conducting home visits for academically struggling or chronically absent students and interviewing all teachers that are hired in the district. During school year 2021–22, to assist the middle school and high school principal, the superintendent moved his office from the administration building to Bloomington Middle School and acquired some of the duties of a principal.

During interviews, staff said that the level of responsibilities taken on by the superintendent is partially in response to the budget constraints Bloomington ISD has experienced during recent school years. District leadership determined that Bloomington ISD did not have the funds to hire additional administrative staff. Additionally, staff reported that an assistant superintendent position existed when the current superintendent was hired, but leadership determined that, at that time, the position was not necessary for the district. As a result, the superintendent received some of the responsibilities of this former position. The superintendent also assumed additional oversight and responsibilities as a result of the environment he inherited when joining the district. This situation included the district’s poor academic performance and several alleged financial improprieties. The focus of the superintendent’s additional oversight and responsibilities is to help ensure effective management of the district and to rebuild confidence in district leadership among staff and the community.

An effective distribution of duties enables the superintendent to focus on critical strategic initiatives that contribute to the district’s overall success. However, the Bloomington

**FIGURE 1–5
POSITIONS REPORTING TO THE SUPERINTENDENT
AT BLOOMINGTON ISD COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2021–22**

| DISTRICT | STUDENT ENROLLMENT | REPORTING POSITIONS |
|------------------------|--------------------|---------------------|
| Bloomington ISD | 885 | 18 |
| Odem-Edroy ISD | 841 | 8 |
| Santa Gertrudis ISD | 779 | 8 |
| Skidmore-Tynan ISD | 804 | 9 |

SOURCES: Legislative Budget Board School Performance Review Team, October 2021; Texas Academic Performance Report, school year 2020–21.

ISD superintendent’s duties of managing staff and daily responsibilities diminish the time available for executing many other duties, such as staff evaluations, district planning, and district goal setting. For example, interviews with staff showed that, with the exception of campus principals, very few of the positions that report directly to the superintendent have received any formal evaluations during the previous two school years. Additionally, none of the departments overseen by the superintendent established any long-term goals or performance metrics from which they can be evaluated effectively. In addition, Bloomington ISD has not implemented its multiyear strategic plan to guide the proper management of the district’s budgetary and time management resources.

By placing so many responsibilities on the superintendent, the district’s performance depends overwhelmingly on the leadership and guidance of one individual. During interviews, staff and the board expressed strong support for the superintendent’s management of the district. However, Bloomington ISD’s current organizational structure places the district at risk for long-term inefficiency and dysfunction if the superintendent leaves his position.

Bloomington ISD should modify the district’s organizational structure to decrease the superintendent’s supervisory responsibilities and decrease the superintendent’s duties that extend beyond those specified in board policy and state law.

Reducing the number of directly reporting positions to the superintendent and reassigning some of the superintendent’s responsibilities to other district staff will result in a healthy reorganization of Bloomington ISD’s administrative structure. Although this reorganization ultimately should be the district’s goal, current budget constraints do not enable the district to address this goal immediately. The

board and superintendent should plan to reduce the directly reporting positions to the superintendent to no more than 10, and ideally as few as eight positions, by the end of school year 2023–24.

This goal can be accomplished by establishing assistant superintendent positions to which some of the superintendent's current staff would report instead. One possibility would be to develop the maintenance director position into an assistant superintendent of operations. All operational department heads would report to this position, including the food service director, transportation director, technology director, and head custodian. The district no longer would have a maintenance director but instead would establish a lead maintenance worker position reporting to the assistant superintendent of operations.

Another option is to establish an assistant superintendent of academics, either by redefining the curriculum administrator position or by establishing a new position. This position would report to the superintendent and supervise the director of special programs, student-and-community-engagement director, technology director, and campus principals. This adjustment would reduce the superintendent's supervisory duties to a more manageable level.

Additionally, the district could provide training and support to prepare the business manager to have the operation directors report directly to this position.

Finally, the superintendent should determine which of his daily duties could be delegated effectively to other positions. The superintendent should assess all his responsibilities and estimate how much time each responsibility requires. The superintendent also should require all Bloomington ISD department heads to evaluate and report on the nature of their duties, which would enable the superintendent to determine which department heads have the time and resources to absorb some of the superintendent's duties most effectively.

No fiscal impact is assumed for this recommendation. If the district decides to establish one or more new positions to accomplish this recommendation, the district will incur associated costs. However, these costs cannot be determined because they will depend on how the district chooses to proceed.

BOARD TRAINING (REC. 2)

Bloomington ISD's board members do not complete all the training hours required by statute and board policy.

Effective governance of local school districts is the result of well-prepared board members. Provisions in Texas law govern the initial training and continuing education of school board members for this purpose. Continuing education requirements for school board trustees developed by the State Board of Education appear in the Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter A, Section 61.1. In addition, the Texas Government Code prescribes school board member training in sections 551.005 for open meetings, 552.012 for open records, and 2054.5191 for cybersecurity.

Figure 1–6 shows an overview of these continuing education requirements for school board members pursuant to state law.

As part of its review, the LBB's School Performance Review Team obtained training records from the district for all six current board members. **Figure 1–7** shows a summary of Bloomington ISD's board member continuing education hours from January 2018 to September 2021.

As shown in **Figure 1–7**, Bloomington ISD board members have not completed several of the required trainings. For example, the board training records indicate that no board member received the required trainings on the Texas Public Information Act or cybersecurity. Additionally, the records indicate that only one board member received any training on evaluating and improving student outcomes.

Bloomington ISD also lacks an effective process for ensuring that board members receive the required training hours. If board members are interested in attending training, they inform the superintendent's secretary, who arranges registration and travel. The superintendent's secretary also records the continuing education training hours accumulated annually by each board member and updates members on their status periodically during the school year. However, the district does not have a formal training calendar for board members, a method for board members to view their accumulated training hours, nor a process to see all the trainings available to them. The district also does not have a formal process to compare board-training hours to statutory requirements. During onsite interviews, board members reported being unaware of the training requirements found in board policy or state law. Bloomington ISD staff reported being aware of some of the training requirements, but not all of them.

**FIGURE 1–6
OVERVIEW OF CONTINUING EDUCATION REQUIREMENTS FOR BOARDS OF TRUSTEES
FALL 2021**

| REQUIRED CONTINUING EDUCATION | FIRST YEAR IN OFFICE | SUBSEQUENT YEARS IN OFFICE |
|---|--|--|
| Local district orientation | 3.0 hours within the first 120 days in office | Not required |
| Orientation to the Texas Education Code | 3.0 hours within the first 120 days in office | Not required |
| Amendments to the Texas Education Code | Following each legislative session; training must be of sufficient length to address major changes | Following each legislative session; training must be of sufficient length to address major changes |
| Team building | 3.0 hours | 3.0 hours annually |
| Additional continuing education, based on the district's framework for school board development | 10.0 hours | 5.0 hours annually |
| Evaluating and improving student outcomes | 3.0 hours within the first 120 days in office | 3.0 hours every two years |
| Education addressing sexual abuse, human trafficking, and other maltreatment of children | 1.0 hour within the first 120 days in office | 1.0 hour every two years |
| The Texas Open Meetings Act | 1.0 hour within the first 90 days in office | Not required |
| The Texas Public Information Act (PIA) | 1.0 hour within the first 90 days in office | Not required |
| Cybersecurity | Required to attend a training, but the hours vary by provider | Required to attend one training annually |

SOURCE: Texas Education Agency, School Board Training Requirements, October 2021.

**FIGURE 1–7
BLOOMINGTON ISD BOARD OF TRUSTEES CONTINUING EDUCATION HOURS
JANUARY 2018 TO SEPTEMBER 2021**

| REQUIRED TRAINING (2) | TRUSTEE MEMBER A (1) | TRUSTEE MEMBER B | TRUSTEE MEMBER C | TRUSTEE MEMBER D | TRUSTEE MEMBER E | TRUSTEE MEMBER F |
|---|----------------------|------------------|------------------|------------------|------------------|------------------|
| Local district orientation | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 |
| Orientation to the Texas Education Code | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 |
| Amendments to the Texas Education Code (3) | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Team building | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 |
| Additional continuing education, based on the district's framework for school board development | 1.0 | 9.25 | 23.0 | 12.0 | 0.0 | 6.75 |
| Evaluating and improving student outcomes | 0.0 | 3.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Education addressing sexual abuse, human trafficking, and other maltreatment of children | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 |
| The Texas Open Meetings Act | 0.0 | 0.0 | 2.0 | 2.0 | 2.0 | 2.0 |
| The Texas Public Information Act | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Cybersecurity | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

NOTES:

(1) Board members are identified by letters for anonymity.

(2) Reported hours that do not meet statutory requirements are shown in bolded text.

(3) As of October 2021, the board had decided not to organize training regarding amendments to the Texas Education Code until after the Eighty-seventh Legislature completed its Third Called Session, which was in progress.

SOURCES: Legislative Budget Board School Performance Review Team, October 2021; Bloomington ISD, Board Training Records, January 2018 to September 2021.

Additionally, Bloomington ISD's Board Policy BBD (LOCAL) requires the board president to announce the status of each member's continuing education credits annually at the last regular meeting before the district's November election date. The policy also requires that the announcement appears in board minutes and on the district's website. However, during onsite interviews, board members said that they recalled no training announcements at any board meetings during their tenure on the board.

Without consistent continuing education, board members may lack the knowledge and information needed to make the best decisions for the district. The board also may not be informed of industry best practices or legislative updates that affect school districts. This lack of continuing education could hinder board members' understanding of their roles and responsibilities and impair their ability to oversee district operations effectively.

Bloomington ISD should modify the school board's continuing education training process to ensure that board members receive all required trainings.

To achieve this outcome, the district should complete the following tasks:

- the superintendent's secretary should develop an annual board training calendar identifying governance-related training topics and specific dates that board members are required to attend training;
- the superintendent's secretary should review the required training for the board to remain informed of statutorily required trainings that board members must complete;
- the superintendent's secretary should update board members quarterly regarding their training hours;
- the board president should announce publicly all members' board training hours during the annual October board meeting, as specified in district policy; and
- the superintendent's secretary should distribute an annual survey to board members to determine their training preferences and use the results to build the board's training calendar for the subsequent year.

This recommendation could be implemented with existing resources.

DISTRICT AND CAMPUS IMPROVEMENT PLANS (REC. 3)

Bloomington ISD lacks a process to effectively develop and administer its district and campus improvement plans.

Statute requires districts to develop campus improvement plans (CIP) and a district improvement plan (DIP). The Texas Education Code, Section 11.252(a), requires that every school district has a DIP that is developed, evaluated, and revised annually. The purpose of the DIP is to guide school district staff in the improvement of student performance. The DIP establishes a set of measurable annual goals, objectives, and strategies used to monitor student performance in the district. The Texas Education Code requires a DIP to include the following provisions:

- comprehensive needs assessment addressing the district's student performance on achievement indicators and other appropriate measures of performance;
- measurable performance objectives for all appropriate achievement measures for all student populations in the district, including students in special education programs, and other measures of student performance that may be identified through the comprehensive needs assessment;
- strategies for achieving the performance objectives;
- resources needed to implement identified strategies;
- staff responsible for ensuring the accomplishment of each strategy;
- timelines for ongoing monitoring of the implementation of each improvement strategy;
- formative evaluation criteria for determining periodically whether strategies are resulting in intended improvement of performance;
- the district's policy addressing sexual abuse and other maltreatment of children; and
- a trauma-informed care policy.

Similarly, the Texas Education Code, Section 11.253, requires that every school district annually develops a CIP for all campuses. CIPs follow the same structure as the DIP but are campus-based plans that establish educational objectives and specify how resources and time will be allocated during the school year to meet the determined objectives.

To guide the development of these plans, Bloomington ISD established the following board policies to align district practice with statute:

- Board Policy BQ (LEGAL), regarding the overall planning and decision-making process;
- Board Policy BQA (LEGAL), regarding planning and decision-making at the district level; and
- Board Policy BQB (LEGAL), regarding planning and decision-making at the campus level.

These board policies require the district to establish site-based, decision-making (SBDM) committees for the district and each campus to assist in developing and evaluating the DIP and CIPs. The policies require that these committees include Bloomington ISD staff, business and community representatives, and parents; and that teachers constitute at least two-thirds of the Bloomington ISD staff on each committee. The policies also describe other required activities for the committees, such as establishing a meeting schedule, disseminating communication to district stakeholders, consulting with the superintendent, reviewing dropout data, and assessing the effectiveness of the local dropout prevention program.

Bloomington ISD's process for developing the school year DIP consists of the following steps:

- the district needs assessment is administered each spring;
- staff compile state testing data each summer;
- the DIP committee updates the DIP in August for the upcoming school year using the previous school year's DIP as a basis; and
- the final DIP is submitted to the board for approval at the November board meeting.

Bloomington ISD's official process for developing CIPs is similar to the DIP process. Each campus establishes a CIP committee. Based on the results of the district needs assessment and available state academic data, each CIP committee develops goals and performance objectives with campus-specific strategies.

However, Bloomington ISD's process for developing and monitoring annual DIP and CIPs is inefficient, is not consistent among campuses, and does not follow board policy.

For example, the process is inefficient as the DIP and CIPs are not submitted to the board for approval until the November board meeting each year. As a result, the plans are implemented when the district is more than three months into the school year. District staff reported they would like to have the plans submitted and approved earlier in the school year. This goal was difficult to accomplish during the last two school years because of the COVID-19 pandemic. However, the district's 2019–20 DIP, the last plan established before the pandemic, also was not approved until November 2019.

The superintendent presents updates periodically at board meetings on how Bloomington ISD is meeting its DIP goals. However, during interviews, staff said that monitoring of the DIP has not been established as a district priority. Most campus and district administrators reported being uncertain as to whether the district had accomplished the goals specified in the school year 2020–21 DIP. The district also lacks a process that requires administrators to report to the superintendent on their progress on DIP goals or engage in regular discussion about DIP strategies and objectives. Most board members also reported not knowing whether the district met its goals for the school year 2020–21 DIP, and several stated that they do not receive updates on the DIP after it is approved, even though other staff and board minutes said that they did.

Similarly, Bloomington ISD does not have a consistent process for how the CIPs are monitored at each campus. During interviews, some campus administrators described a structured process in which their CIP was monitored and assessed regularly. Others stated that they monitored the goals established in the CIP on an ad hoc basis, and others reported giving limited attention to the CIP after it was developed. Only one administrator was able to confirm that a campus met the goals established in its school year 2020–21 CIP.

The lack of consistency among the CIPs also was evident from the difficulty of obtaining certain CIPs. The most recent CIPs that are available publicly on the district's website are from school year 2019–20. When asked to produce a copy of the school year 2020–21 DIP or drafts of school year 2020–21 CIPs, some administrators complied without difficulty while others struggled to find them and did not have copies readily available.

Bloomington ISD also does not have district-level or campus-level committees that comply with board policies. Board meeting agendas, minutes, and other documents do

not refer to SBDM committees at the district or campus levels. District and campus staff reported in interviews that, although campus-level committees help to develop the CIPs, these committees do not meet the requirements established in statute or board policy to qualify as SBDM committees. For example, these committees do not meet regularly or perform any functions outside of developing the CIPs. The membership of these committees also is not consistent across campuses, and some do not include community representatives or parents as required by policy. The size and composition of the committees vary by campus, and no administrators could confirm that two-thirds of the staff members on each committee are teachers.

Failure to establish an SBDM at the district or campus level is a violation of statute and board policy. Lack of involvement by stakeholders in the campus and district improvement processes impedes progress, and failure to implement statute and policy could lead to sanctions from government entities.

Effectively implementing and monitoring the DIP and CIPs is particularly important for Bloomington ISD, because the district received an academic accountability rating of D for school year 2018–19 on the state’s A–F scale. This rating is the most recent available for Bloomington ISD, because TEA did not assess ratings for Texas school districts for the past two school years due to the limitations of the COVID-19 pandemic. The district’s D rating is consistent with the following individual campus ratings:

- Bloomington Elementary School – F;
- Placedo Elementary School – F;
- Bloomington Middle School – D; and
- Bloomington High School – D.

The Crossroads Connect Academy was not established when the most recent academic accountability ratings were assessed.

The DIP and CIPs are the only board-approved academic goals established for the district and each campus. Failure to consistently monitor these plans may result in the district and campuses lacking updates on academic progress and ultimately may hinder overall student academic improvement.

TEA and regional Education Service Center III (Region 3) provide materials intended to assist districts in developing district and campus goals and monitoring progress. TEA publishes a resource guide to SBDM committees for school

districts on its website. Region 3 offers similar materials and provides direct technical assistance to districts.

Bloomington ISD should establish procedures to coordinate development and implementation of district and campus improvement plans that include a defined calendar for implementation; site-based, decision-making committees; and required progress reporting.

The superintendent should coordinate with the board to establish a formal timeline for the planning processes of the DIP and the CIPs. This timeline should require that the DIP and CIPs are completed and submitted to the board no later than the August board meeting, and this timeline should be incorporated into board policy and used to guide the development of the plans.

In place of the existing CIP committees, the superintendent should require that each campus forms a site-based decision-making committee that aligns with the district’s legal and local policies to ensure that district and campus goals are being met. The superintendent should ensure that the DIP committee meets SBDM requirements and require that each campus principal submits SBDM committee membership rolls. The superintendent also should require that the membership of each campus SBDM committee comply with statute and board policy. Additionally, the district should define roles and responsibilities for all responsible parties in the SBDM process. The superintendent should inform the board as soon as these committees have been formed in accordance with board policy.

The district also should develop a schedule of meetings with a specific focus on monitoring the progress of the district’s goals. The superintendent and board should designate agenda items at board meetings for goal progress monitoring during the school year.

Additionally, the superintendent should collaborate with campus administrators and the business manager to establish a process for reporting DIP and CIP progress quarterly. The superintendent should meet with each principal quarterly to assess CIP progress. Similarly, the superintendent, business manager, campus administrators, and the district’s SBDM committee should meet quarterly to discuss DIP progress. The superintendent and board should designate agenda items at every third board meeting to monitor DIP and CIPs goal progress.

The district could implement this recommendation with existing resources.

BOARD MEETING ATTENDANCE (REC. 4)

Bloomington ISD lacks a method to hold board members accountable for attending board meetings.

The primary methods that school boards apply to oversee and govern the management of a school district is to hold regular school board meetings. These meetings inform the board about district activities and provide a public forum for the board to engage in district-related decision making, problem solving, planning, and evaluation. Members must be present at board meetings to meet their duly elected obligations to participate in board decisions and vote on agenda items recommended by the superintendent.

However, Bloomington ISD's board members repeatedly are absent from school board meetings, and the board's operating procedures lack guidance regarding attendance at regular and called board meetings. The review team examined the minutes of 28 Bloomington ISD board meetings held from June 2020 to November 2021, including 17 regular board meetings and 11 called board meetings.

Of the 28 reviewed meetings, only four, or 14.3 percent, were attended by all board members. Other data from the meetings show that one member was absent from 39.3 percent of board meetings and three members were absent from 7.1 percent of meetings.

The district distributes an annual calendar of all board meetings to board members in August. During school years 2019–20 and 2020–21, the COVID-19 pandemic affected how board meetings were conducted. Some meetings were conducted remotely through an online streaming process, and some meetings took place in person, but board members had the option to attend remotely. During onsite interviews, board members said that holding partially or completely remote meetings was a challenge, but none reported it contributed significantly to an increase in board member absences.

Bloomington ISD's school year 2020–21 board operating procedures state that "any time four or more board members are gathered to discuss school district business, it is considered a meeting." The district has a seven-member board that was reduced to six members when one member resigned in August 2021. All the board meetings held since June 2020 met the minimum requirements for a quorum. Bloomington ISD's board operating procedures do not further address board meeting attendance.

Irregular board member attendance diminishes the members' ability to make informed decisions regarding the district. Board members who frequently miss meetings may lack a comprehensive understanding of the issues surrounding agenda items brought by the superintendent, which decreases the board's ability to address those items effectively. This ability is particularly important for Bloomington ISD because the board's lack of adequate oversight contributed to recent problematic issues: (1) TEA rated the district's academic accountability as a D for school year 2018–19; and (2) former district leadership reportedly engaged in financial improprieties and other questionable conduct.

Bloomington ISD should amend the board's operating procedures to increase board member attendance at board meetings.

The board and superintendent should amend the operating procedures to emphasize and facilitate board attendance and include the following elements:

- include a provision requiring all members to attend each board meeting unless extenuating circumstances exist;
- solicit feedback from board members before finalizing the annual board calendar and require members to note in advance which dates, they might miss, especially during holidays and summer. The board should then consider changing the meeting dates based on early projected attendance. For example, if two members cannot attend the December meeting, the superintendent and board president should consider changing the date of the board meeting well in advance;
- develop a reminder system that updates members when one cannot attend so that other members will prioritize their attendance to produce a quorum. This system could include emails, texts, and phone calls; and
- develop an annual presentation at the December board meeting that reports the attendance record for all board members during the previous calendar year.

The district could implement this recommendation with existing resources.

STRATEGIC PLANNING (REC. 5)

Bloomington ISD lacks a comprehensive, multiyear strategic planning process that sets measurable goals, addresses the long-term needs of all areas of the district, and directs the use of district resources.

Bloomington ISD develops six improvement plans each year, including the DIP and one CIP for each of the five campuses. The DIP and the CIPs are one-year plans that set the district's and campuses' educational objectives and specify how resources and time will be allocated during the school year to meet the determined objectives. Although the district has processes for developing required district and campus improvement plans, it has no process for producing a long-range strategic plan to guide the development of required annual district and campus plans.

The DIP and CIPs developed by the district result from a practice known as compliance planning. Compliance planning involves developing a plan using a template or chart with items from a checklist to meet requirements by monitoring agencies, such as TEA. In many instances, this approach does not result in a plan derived from a deliberative process, but rather a document for the purpose of meeting a certain requirement.

Bloomington ISD's DIP is developed annually and is not structured to facilitate long-range planning. Bloomington ISD's DIP is focused on instruction and sets goals for student achievement, fiscal responsibility, community involvement, and personnel as they relate to the delivery of educational services. The DIP does not address transportation, food service, asset and risk management, and other areas of district operations. As a result, planning for items such as technology, facilities, and risk management are not addressed or are included in ancillary documents that are not integrated into a single comprehensive strategic plan.

During onsite interviews, the superintendent and board members reported that they have begun developing a strategic planning process through their involvement in LSG. The superintendent and board began drafting the strategic plan in August 2021 and were continuing development at the time of the review. Although this initial strategic planning process is a positive first step, the draft was not finalized, nor was it made available to the review team. It is not clear what long-term goals appear in the plan, whether these goals incorporate all functions of the district including student outcomes, or whether these goals are connected to district resources. In addition, the development of the plan

did not include involvement from other stakeholders such as teachers, department heads, and community members.

Without a comprehensive strategic plan ranging from three years to five years, the district may react to administrative, operational, and academic challenges annually rather than planning systematically for a longer period through a well-defined process. In addition, without an established and comprehensive strategic planning process, the district cannot articulate its direction based on consensus of long-term needs, use of resources, or stakeholder goals.

Strategic plans enable school districts to address unforeseen events more effectively, allocate budget and human resources to achieve goals more effectively, and establish accountability standards. For example, a decrease in tax base due to economic downturn could affect the district's budget without proper long-range planning. Sound strategic plans encompass all aspects of district operations, including academic, operational, and financial goals. Each goal is tied to resource requirements, student achievement, implementation steps, timelines, action items, performance measures, and fund requirements. A strategic planning process also can help obtain stakeholder support by engaging staff, parents, and community representatives in the planning process.

Figure 1–8 shows a best practice model of a strategic planning process.

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

The superintendent and the board should use their work from the LSG process as a starting point. They should ensure that the strategic planning process addresses functional areas that are not included in the DIP, such as facilities, technology, risk management, and safety and security. All strategic planning efforts by the district should include input from staff, community representatives, and other stakeholders.

To implement this recommendation, Bloomington ISD should perform the following tasks:

- establish a district team that includes the superintendent, department heads, campus principals, teachers, selected board members, business community representatives, and parents. The district team should be responsible for developing the strategic planning process and completing the following tasks:

**FIGURE 1–8
STRATEGIC PLANNING BEST PRACTICE MODEL, 2017**

| STEP | PURPOSE |
|---------------------------------------|--|
| Step 1: Vision Setting | The board, superintendent, and key stakeholders engage in a vision- setting process to determine what characteristics the district should have if it operated at the optimal level. |
| Step 2: Mission and Goals | The board, superintendent, and key stakeholders identify a mission with associated goals that, when accomplished, will bring the district closer to fulfilling its vision. |
| Step 3: Setting Priorities | The board prioritizes the district’s most important goals to serve as the basis of the strategic plan. |
| Step 4: Identifying Barriers | The board, superintendent, and leadership team use data to identify the key barriers to accomplishing the goals. |
| Step 5: Identifying Resources | The administration connects the budgeting process to the planning process to ensure that district goals and priorities are included in budget allocation. |
| Step 6: Strategy | The superintendent, administration, and key stakeholders, including parents, business leaders, civic organizations, and community groups, develop strategies to accomplish the goals by addressing the identified barriers, developing timelines for completion, assigning accountability, identifying performance measures, and allocating resources. |
| Step 7: Consensus Building | The board, superintendent, and stakeholders build consensus, review the plan for viability, and approve the final document. |
| Step 8: Implementation and Monitoring | Individuals or departments with assigned accountability implement the plan strategies and monitor progress against performance measures and use of allocated funds. |
| Step 9: Evaluation | The district evaluates the success of the plan and determines which performance measures were met, which goals were fulfilled, and which obstacles prevented success. The superintendent presents findings to the board. |

SOURCE: Legislative Budget Board School Performance Review Team, Strategic Planning Best Practice Model, 2017.

- identify and facilitate the logistics of the strategic planning process and develop a timeline based on these factors;
- identify the overall direction, values, mission, vision, purpose, and goals for the plan; and
- develop objectives and strategies, identify resources, and design metrics to measure the outcomes;
- post the strategic plan on the district website for public comment;
- submit the plan to the full board for approval;
- incorporate components of the plan in the annual DIP and CIPs; and
- share highlights of the strategic plan 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 instructional and noninstructional areas. In addition, the strategic plan should identify the resources required to accomplish the goals, including funding sources. The district also should task staff with achieving 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.

To implement the plan, all principals and department heads should report their progress toward any goals that affect their campuses or departments twice a year to the superintendent. This progress report should include a meeting with the superintendent to discuss challenges and any additional support necessary to accomplish the plan’s goals. Additionally, the assigned staff should report at least twice a year to the board regarding the progress of accomplishing each goal in the strategic plan.

Bloomington ISD also should consider holding an annual strategic planning workshop for board members, the superintendent, and identified key stakeholders to discuss the progress of the strategic plan.

The district could implement this recommendation with existing resources.

DISTRICT OPERATING PROCEDURES (REC. 6)

Bloomington ISD lacks documented operating procedures and processes for efficient implementation of district operations.

Bloomington ISD Board Policy BP (LOCAL) states that the superintendent and administrative staff are responsible for developing and enforcing procedures for the operation of the district. Procedures are formally defined methods of accomplishing a task, usually with steps that are performed in a prescribed order. Effective procedures provide a blueprint that establishes consistency and helps ensure that a district's operations are carried out effectively and efficiently. Texas school districts routinely develop and publish operating procedures that translate board policies and state law into guidance for the district's daily operations. These procedures are compiled either as a comprehensive manual covering all functional areas or individually as departmental manuals.

However, most departments in Bloomington ISD lack documented procedures that describe all the duties required of staff and how staff are to perform critical functions. The district does not have formalized, detailed, operational procedures or operating manuals in the following departments and functional areas: the Business Office, maintenance, custodial, facilities, safety and security, information technology, food services, human resources, transportation, and educational service delivery.

Newly hired staff typically receive verbal instruction regarding how to perform their duties. They also learn about informal procedures by following and observing established employees in their departments. Although some departments have limited written documentation of job duties, no Bloomington ISD department has a comprehensive set of standard operating procedures to guide its operations.

When policies are implemented through informal procedures and institutional knowledge, they cannot be sustained effectively. Additionally, the district risks loss of institutional knowledge with administrative turnover because current practices rely on experienced staff's knowledge of required processes and resources. That turnover results in difficulty and stress for incumbents in these positions to implement their job duties effectively and to ensure that previous procedures or functions continue at the same level of accuracy, consistency, and uniformity.

This documentation is especially important in Bloomington ISD because the district has experienced high staff turnover. During the previous three school years, the district has hired a new superintendent, transportation director, maintenance director, business manager, and technology director. Several of these individuals have not held director positions

previously, and the lack of comprehensive operating procedures or individual department manuals may hinder significantly their abilities to perform their duties effectively. This lack of documentation may have contributed to the following ineffective, inefficient, inconsistent practices in several departments:

- the Transportation Department relies on manual, paper-based processes for transportation operations and record keeping and has no documentation of how to perform routine tasks;
- the district lacks a clearly defined contract management function to ensure adequate administration, evaluation, and oversight of district contracts;
- the district's human resources function is fragmented and lacks consistent and coordinated implementation and evaluation; and
- the district relies on informal processes for maintenance operations and record keeping.

Bloomington ISD should develop and implement clear operating procedures and processes across each functional area of the district.

The superintendent should assign responsibility for coordinating development of procedures to the department heads that oversee each functional area. The department heads should review and identify areas in which established and written procedures are outdated or do not exist. They should gather written documentation related to essential procedures and practices in each of their functional areas. These staff should write and update procedures for all critical functions performed by their campuses or departments.

The development process should include opportunities for review and comment by staff with responsibility for each area or whose responsibilities intersect with an area. The procedures should identify staff responsible for updating the procedures in response to changes in law, changes in board policy, and feedback from staff and other stakeholders.

Each department head should submit their completed procedures to the superintendent for approval, after which the approved procedures should be distributed to all affected staff and used as training tools for all new staff.

The district could implement this recommendation with existing resources.

COMMUNITY INVOLVEMENT (REC. 7)

Bloomington ISD's community involvement activities lack coordination and are delivered inconsistently.

Components of a successful community involvement program with a school district include the following practices:

- developing strategies for communicating information to parents and the community;
- employing effective methods for recruiting, engaging, and tracking the effectiveness of volunteers;
- soliciting businesses' support for school functions;
- developing outreach activities intended to encourage community participation in the district; and
- following effective processes to oversee media relations, district fundraising, and response to public information requests.

Although Bloomington ISD's school counselor for grades six to 12 serves as the student-and-community-engagement director, this individual has many other district duties, including serving as the district grant coordinator and safety-and-security coordinator. In addition, the duties of the community engagement director are limited to communicating with parents and the community through the district's social media pages and do not include management of all the district's community involvement functions.

Bloomington ISD lacks a coordinated approach to planning and executing the district's community involvement function. The various elements of community involvement activities are implemented and managed at the campus level with little or no coordination among campuses or guidance and monitoring at the district level.

For example, Bloomington ISD's community involvement function operates without long-range plans, strategies, or expectations for each campus. The district has not developed an action plan and strategies to ensure that partnerships exist among campuses, families, and communities. Principals often assume the responsibilities for developing and implementing partnerships, but they do so without any long-range planning. As a result of the district's lack of a documented strategic plan, community involvement functions are coordinated informally and are inconsistent and not goal-oriented.

Additionally, the effectiveness of community involvement activities varies among campuses based on each principal's interest and effort and on the initiative and dedication of

parents. The district held a Fall Festival for parents and students, but all other community events and activities are coordinated by individual campuses. For example, Bloomington Elementary School organized several community events and activities for school year 2021–22, including back-to-school night, open houses in fall and spring, academic nights for each grade level, three book fairs, a Thanksgiving meal for students and parents, a Valentine's Day store, and end-of-the-year awards. Placedo Elementary School reported having an open house night at the beginning of the school year, a Thanksgiving meal, and various student plays and presentations throughout the year. However, interviews with staff and postings on the campus websites indicate that community events at the other campuses were limited to Meet the Teacher nights and open houses. The district does not have a master list of community involvement activities at all campuses, and communication about events with parents and the community varies by campus.

Bloomington ISD's lack of coordination of community involvement activities also has resulted in inconsistencies in how volunteers are tracked. The district has no formal process to monitor volunteer data, and each campus determines how to track volunteer hours. Some campuses use sign-in sheets but do not record the purpose of the volunteer effort or amount of time reported. Without a system to track volunteer information, the district cannot recognize volunteers formally for their work on behalf of the district. Failure to track and recognize volunteers may limit their engagement with the district and impede the district's ability to establish a volunteer contact list for events and fundraisers.

Bloomington ISD does not perform needs assessments or formal evaluations of its communications or stakeholder involvement activities and programs. During onsite interviews, staff reported that the district planned to conduct a community needs assessment in school year 2021–22; however, the needs assessment tool had not been completed at the time of the onsite visit, and no community need assessment had been conducted previously.

This lack of coordination of community involvement activities may result in inconsistent community engagement throughout the district. For example, no Bloomington ISD campus has had an active parent-teacher organization (PTO) during the past five school years. The middle school and high school plan to initiate a PTO during school year 2021–22, but sufficient parent participation had not been confirmed at the time of the review.

Community involvement is an important element in operating a successful school district. Community members and volunteers provide valuable resources that can enrich and enhance the educational system. By engaging family and community representatives in students' school experiences, districts can support students' development and learning and improve school practices and operations by identifying the features that best support students. Research shows that when families and communities are involved in student learning, students improve their academic performance and gain advocates that promote their success, helping them feel more confident at school and in performing more rigorous coursework.

Bloomington ISD should assess the existing operations and priorities of the district's community involvement functions and adopt a more centralized approach to overseeing community and stakeholder engagement.

The district should begin by developing a long-range plan to guide community involvement functions. It should form a committee to oversee involvement with the public and guide planning for community involvement. The committee should meet monthly to develop long-range plans that maximize parental involvement, including the establishment of one or more PTOs, and improve community relations and public relations. Members of this committee could include the superintendent, principals, the student-and-community-engagement director, selected teachers, and interested parents and community representatives.

When developing the long-range plan, the committee should develop a vision with standards and guidelines to promote overall quality and effectiveness of community involvement across all campuses. This plan should include the following components:

- Bloomington ISD should develop a set of annual community involvement goals and expectations for the district and each campus. The student-and-community-engagement director should ensure that all principals are aware of these expectations and goals, and the committee should revisit these goals at the beginning of each school year to establish new goals as needed. These goals and expectations should be presented to the board, and the student-and-community-engagement director should report to the board regularly throughout the school year on the status of these goals;

- the district should maintain a master list of all community activities at each campus, developed from the campus-level community engagement calendars submitted by the principals to the student-and-community-engagement director at the beginning of the school year;
- the district should develop written guidelines for campuses and volunteers, recruitment strategies, tracking activities, and a process to recognize participation. The student-and-community-engagement director should coordinate the development of these guidelines and designate at each campus a volunteer coordinator responsible for implementing volunteer opportunities, tracking activities, and recognizing parent volunteers. Additionally, the volunteer coordinators 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 at least twice a year to ensure that new leadership is identified consistently, as parents and students advance through the school system. The volunteer coordinators should submit quarterly reports to the student-and-community-engagement director so that all volunteer numbers and activities can be tracked and assessed at the district level. This reporting will enable the district to determine which campuses may need more assistance or resources in improving community engagement; and
- the district should conduct an annual community needs assessment to ensure that it is meeting the needs of the community and to gain insight on how better to improve community engagement. This needs assessment can be used to establish the annual community involvement goals.

The district could implement this recommendation with existing resources.

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. However, by implementing **Recommendation 2**, modifying the district’s organizational structure, Bloomington ISD will incur costs if it decides to hire one or more new positions to decrease the superintendent’s supervisory responsibilities and other duties.

2. EDUCATIONAL SERVICE DELIVERY

ACCOMPLISHMENTS

- ◆ Bloomington ISD has implemented behavior management models that staff report have improved student behavior and lowered recidivism.
- ◆ Bloomington ISD implemented a program to provide telehealth services at its schools at no cost to the district.

FINDINGS

- ◆ Bloomington ISD does not have a formal curriculum management plan, nor a process to develop, adopt, and monitor the plan.
- ◆ Bloomington ISD does not identify gifted and talented students adequately or provide staff with the necessary professional development opportunities to implement a comprehensive program for these students.
- ◆ Bloomington ISD's Career and Technical Education (CTE) program is not guided by an advisory committee to oversee and evaluate the program.

RECOMMENDATIONS

- ◆ **Recommendation 8: Establish a process to develop, implement, and revise a curriculum management plan.**
- ◆ **Recommendation 9: Implement policies and procedures for a gifted and talented program to identify and meet students' instructional needs.**
- ◆ **Recommendation 10: Establish a CTE advisory committee, develop a CTE plan, and evaluate the district's CTE program regularly.**

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.

FIGURE 2-1

**BLOOMINGTON ISD CAMPUSES AND ENROLLMENT
SCHOOL YEAR 2020-21**

| CAMPUS | GRADE LEVELS | ENROLLMENT |
|-------------------------------|--|------------|
| Placedo Elementary School (1) | Prekindergarten to grade one | 178 |
| Bloomington Elementary School | Prekindergarten and grades two to five | 252 |
| Bloomington Middle School | Grades six to eight | 211 |
| Bloomington High School | Grades nine to 12 | 218 |
| Crossroads Connect Academy | Grades nine to 12 | 26 |

NOTE: (1) The Placedo Elementary School campus also offers Early Childhood Education.

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school year 2020-21.

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.

Bloomington Independent School District (ISD) has five campuses that include two elementary schools, a middle school, a high school, and an alternative campus. Crossroads Connect Academy, the district's alternative campus, offers students a nontraditional setting to complete supported, self-directed online instruction for those needing credit recovery, an accelerated pace, or a modified schedule. Bloomington ISD has a disciplinary alternative education program (DAEP) and a credit-recovery classroom at the high school campus. The district's enrollment for school year 2020-21 was 885 students. **Figure 2-1** shows enrollment at each Bloomington ISD campus and the grade levels each serves.

Figure 2-2 shows the demographics of Bloomington ISD compared to state averages. For school year 2020-21, the student population was 85.1 percent Hispanic, 10.3

percent White, 3.5 percent African American, and 1.1 percent identified as two or more races. Approximately 82.6 percent of students were categorized as economically disadvantaged, greater than the state average of 60.3 percent. The district identified 18.5 percent of students as English learners (EL), which is less than the state average of 20.7 percent. Approximately 55.4 percent of students are designated as at risk, which is greater than the state average of 49.2 percent.

Figure 2–3 shows Bloomington ISD’s accountability ratings for school years 2016–17 to 2020–21. For school year 2018–19, three campuses earned D ratings and two campuses earned F ratings.

The superintendent oversees most of Bloomington ISD’s education service delivery functions. **Figure 2–4** shows Bloomington ISD’s education service delivery organization.

As shown in **Figure 2–4**, all campus principals, the director of special programs, the curriculum administrator, the behavior coordinator, and the nurse all report to the superintendent. The campus principals oversee the campus staff, including teachers and counselors. The Legislative Budget Board’s School Performance Review Team visited the district in October 2021. At the time of the onsite visit, the curriculum administrator also served as the principal for Crossroads Connect Academy.

**FIGURE 2–2
BLOOMINGTON ISD STUDENT DEMOGRAPHICS
SCHOOL YEAR 2020–21**

| STUDENTS | DISTRICT | STATE |
|----------------------------|----------|-------|
| African American | 3.5% | 12.7% |
| Hispanic | 85.1% | 52.9% |
| White | 10.3% | 26.5% |
| Two or more races | 1.1% | 2.7% |
| Economically disadvantaged | 82.6% | 60.3% |
| English learners | 18.5% | 20.7% |
| At-risk | 55.4% | 49.2% |

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

DETAILED ACCOMPLISHMENTS

BEHAVIOR MANAGEMENT MODELS

Bloomington ISD has implemented behavior management models that staff report have improved student behavior and lowered recidivism.

During school year 2021–22, Bloomington ISD middle school and high school administrators began using Restorative Discipline practices and interventions to respond to challenging behavior. The Texas Education Agency (TEA) defines Restorative Discipline as a relational approach to developing school climate and addressing student behavior. The approach fosters belonging over exclusion, social

**FIGURE 2–3
BLOOMINGTON ISD ACCOUNTABILITY RATINGS
SCHOOL YEARS 2016–17 TO 2020–21**

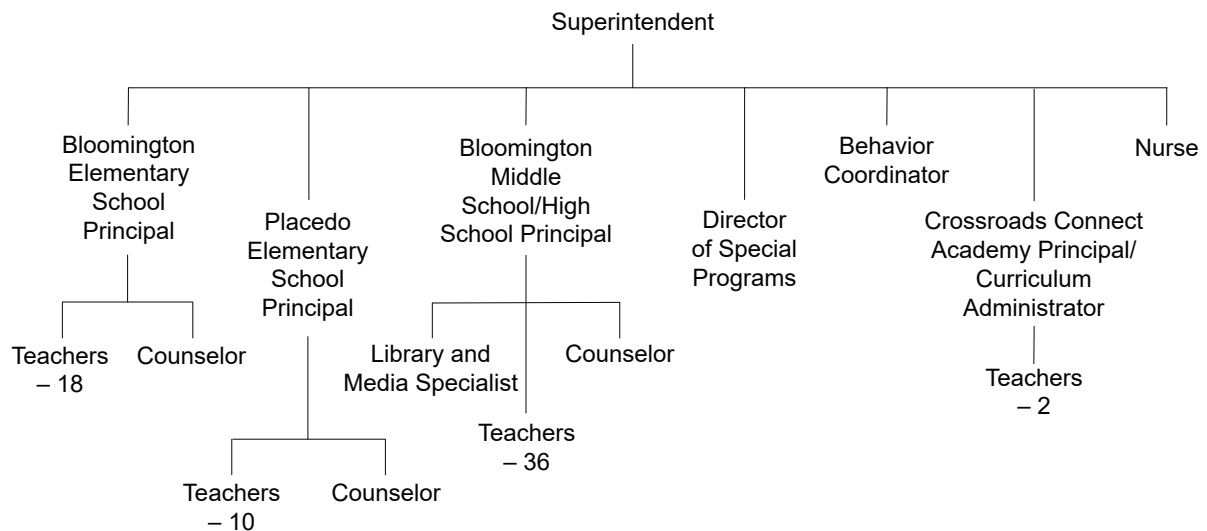
| DISTRICT/CAMPUS | 2016–17 | 2017–18 (1) | 2018–19 | 2019–20 (2) | 2020–21 (2) |
|--------------------------------|----------------------|---------------|---------|-------------|-------------|
| District | Met Standard | Not Rated (5) | D | Not Rated | Not Rated |
| Placedo Elementary School | Met Standard (4) | Met Standard | F | Not Rated | Not Rated |
| Bloomington Elementary School | Improvement Required | Met Standard | F | Not Rated | Not Rated |
| Bloomington Middle School | Met Standard | Met Standard | D | Not Rated | Not Rated |
| Bloomington High School | Met Standard | Not Rated (5) | D | Not Rated | Acceptable |
| Crossroads Connect Academy (3) | N/A | N/A | N/A | N/A | Not Rated |

NOTES:

- (1) The Legislature phased in a new accountability rating system for Texas public schools during this period. During school year 2017–18, school districts received an alphabetical rating, and during school year 2018–19, districts and campuses received alphabetical ratings.
- (2) Districts and most campuses did not receive accountability ratings for school years 2019–20 and 2020–21 during the COVID-19 pandemic.
- (3) Bloomington ISD established the Crossroads Connect Academy during school year 2019–20, and it was not rated for the 2020–21 school year.
- (4) Placedo Elementary School received a paired rating with Bloomington Elementary School for school year 2014–15 and a paired rating with Bloomington High School for school years 2015–16 and 2016–17.
- (5) The district and Bloomington High School were not rated due to the effects of Hurricane Harvey, which made landfall in Texas in August 2017.

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2020–21.

FIGURE 2-4
BLOOMINGTON ISD'S EDUCATION SERVICE DELIVERY ORGANIZATION
SCHOOL YEAR 2021-22



SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

engagement over control, and meaningful accountability over punishment. According to interviews, student behavior was a significant issue during previous school years. The district hired a behavior coordinator during school year 2020-21 to manage all discipline referrals on the middle school and high school campuses.

District staff, including the behavior coordinator and the superintendent, have attended Restorative Discipline training through regional Education Service Center III (Region 3). The district plans to train all teachers in Restorative Discipline in spring 2022. One of the district's Restorative Discipline practices involves resolving behavior issues through dialogue. Counselors bring together students that have conflicts with one another and teach them the social and emotional skills to talk through their problems. If a student misbehaves in class, counselors meet with the teacher and student to discuss the behavior issue and facilitate understanding of the perspectives of everyone involved. The goal of these strategies is to help students to consider different perspectives, practice impulse control, and consider how their actions affect others around them.

According to district staff, implementing Restorative Discipline at the secondary level has resulted in fewer behavior issues during school year 2021-22. At the time of the onsite visit, no students were enrolled in the district's DAEP, which staff reported was unusual in contrast to

previous school years. Typically, by October, the district has enrolled two to three students in the DAEP.

Both elementary schools also have implemented social and emotional learning programming through EarlyAct FirstKnight, a character education program that promotes virtues such as respect, discipline, tolerance, and compassion. The schools conduct social and emotional counseling sessions in groups and with individual students. Bloomington Elementary School uses the Positive Behavioral Interventions and Supports model to teach students positive behavior strategies. According to staff, these behavior management programs have built a sense of community at the campuses and helped improve student behavior. Staff reported that the principals and superintendent periodically evaluate these behavior models and track recidivism, which they said is less than previous years' rates as a result of implementing these programs.

TELEHEALTH SERVICES

Bloomington ISD implemented a program to provide telehealth services at its schools at no cost to the district.

The district partnered with a school-based telehealth company to provide students and staff access to virtual medical appointments in the nurse's office. Through this service, students can visit the nurse's office and videoconference with a doctor who can assess, diagnose, and treat students.

The service also provides students with testing for several infectious diseases, including strep throat, influenza, and COVID-19. Providing telemedicine services at school expands families’ access to healthcare and facilitates better scheduling for parents that work outside the home.

DETAILED FINDINGS

CURRICULUM MANAGEMENT (REC. 8)

Bloomington ISD does not have a formal curriculum management plan, nor a process to develop, adopt, and monitor the plan.

A curriculum management plan is a systematic, defined program of a district’s curriculum development, assessment, implementation, and evaluation. The plan communicates the intent and direction for a district in the areas of curriculum, instruction, and assessment. The plan also coordinates improvement efforts in the development and implementation of the curriculum. It outlines the expectations and procedures for the written curriculum (frameworks), taught curriculum (instruction), and assessed curriculum (testing) in accordance with Bloomington ISD Board of Trustees (board) policy. **Figure 2–5** shows the components of a curriculum management plan, using Mansfield ISD’s plan as an example.

Bloomington ISD uses the Texas Essential Knowledge and Skills (TEKS) Resource System as its district curriculum management system. The district does not have a written curriculum management plan. However, staff cited informal expectations for principals, including reviewing teacher lesson plans, conducting classroom walkthroughs, using the Data Management for Assessment and Curriculum system to analyze student data, and ensuring that teachers

**FIGURE 2–5
EXAMPLE OF CURRICULUM MANAGEMENT
COMPONENTS, SCHOOL YEAR 2021–22**

| COMPONENTS | DESCRIPTION |
|-----------------------|--|
| Curriculum design | The plan provides the philosophical framework for the design of the curriculum and describes the timing, scope, and procedures for curriculum review. It also presents the format and components of aligned curriculum guides. |
| Curriculum delivery | The plan provides direction for curriculum delivery. It identifies a comprehensive staff development program linked to curriculum design and delivery. |
| Curriculum monitoring | The plan provides procedures for monitoring curriculum delivery to determine whether approved curriculum is implemented consistently in classrooms. |
| Curriculum evaluation | The plan specifies assessment procedures to determine curriculum effectiveness and describes the approaches by which assessment data will be used to strengthen curriculum and instruction. |

SOURCE: Mansfield ISD Curriculum Management Plan, school year 2021–22.

are using the TEKS Resource System, including the year-at-a-glance tool to plan for long-term instruction and formative assessments. Staff stated that curriculum implementation is managed primarily at the campus level by each principal. **Figure 2–6** shows some of the responsibilities that staff at the four traditional campuses reported as part of curriculum management, and how they differ by campus.

**FIGURE 2–6
CURRICULUM MANAGEMENT PLAN RESPONSIBILITIES BY CAMPUS (1), SCHOOL YEAR 2021–22**

| PRINCIPAL RESPONSIBILITIES | PLACEDO ELEMENTARY SCHOOL | BLOOMINGTON ELEMENTARY SCHOOL | BLOOMINGTON MIDDLE SCHOOL AND HIGH SCHOOL (2) |
|---|------------------------------|----------------------------------|--|
| Conduct classroom walkthroughs | X | X | X |
| Provide feedback or evaluations to teachers | X | X | X |
| Review teacher lesson plans | | X | |
| Review TEKS Resource year-at-a-glance usage (3) | | X | |
| Review DMAC (3) System usage | | X | |

NOTES:

- (1) Crossroads Connect Academy uses an alternative curriculum and was excluded from this analysis.
- (2) One principal oversees Bloomington Middle School and Bloomington High School.
- (3) TEKS Resource System=Texas Essential Knowledge and Skills Resource System; DMAC=Data Management for Assessment and Curriculum.

SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

FIGURE 2–7
BLOOMINGTON ISD STUDENTS THAT SCORED AT MEETS GRADE LEVEL OR ABOVE ON THE STATE OF TEXAS ASSESSMENTS OF ACADEMIC READINESS COMPARED TO REGIONAL AND STATE AVERAGES
SCHOOL YEAR 2020–21

| LEVEL | SUBJECT | BLOOMINGTON ISD | REGION 3 AVERAGE | STATE AVERAGE |
|------------------|----------------|-----------------|------------------|---------------|
| All Grade Levels | ELA/Reading | 19% | 40% | 45% |
| All Grade Levels | Mathematics | 11% | 37% | 37% |
| All Grade Levels | Writing | 10% | 28% | 30% |
| All Grade Levels | Science | 13% | 40% | 44% |
| All Grade Levels | Social Studies | 24% | 44% | 49% |

NOTE: Region 3=Regional Education Service Center III; ELA=English Language Arts.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

The district has a curriculum administrator position that is responsible for developing and improving the curriculum and assessing the effectiveness of the curriculum and instruction. However, since school year 2020–21, the curriculum administrator took on additional responsibilities as the principal of the alternative campus, Crossroads Connect Academy. At the time of the onsite visit, the principal role required more time, and the curriculum administrator's role in curriculum was limited to conducting teacher observations at a principal's request, coordinating curriculum adoptions, and organizing the professional development schedule. Staff reported that the curriculum administrator also supports principals with curriculum issues on request.

The district does not have a formal process to develop, adopt, monitor, and revise its curriculum. Staff reported discussing curriculum during administrative team meetings, which include campus principals, but the district does not have staff assigned to develop and implement the curriculum districtwide. The district has committed to aligning its curriculum vertically and has developed a process to ensure that instructional staff are teaching the curriculum. However, staff questioned whether the curriculum addresses the needs of special populations, such as gifted and talented students, ELs, and special education students. Additionally, the district does not survey its instructional and support staff to obtain feedback on revising the curriculum or the need for additional training.

Based on state ratings, Bloomington ISD has demonstrated unsatisfactory academic performance. **Figure 2–7** shows that the percentages of Bloomington ISD students performing at or greater than grade level in reading, mathematics, writing, science, and social studies for all grade levels were less than the average rates in Region 3 and the state in every academic category for school year 2020–21.

The district does not have a local board policy for curriculum management to guide its efforts. Without a board policy and a curriculum management plan that includes a process to gather feedback and update the plan regularly, the district is not able to provide a uniform and consistent approach that supports student achievement.

Mansfield ISD's curriculum management plan is guided by the district's legal and local board policy. The plan includes the district's mission and guiding statements, progress on meeting key strategic measures, information on how the curriculum supports special populations, staff's curriculum responsibilities, and the planning process for development and evaluation of the curriculum management plan. The posted plan also includes a link to the district's website for information and a link for staff to provide feedback regarding the curriculum.

Texarkana ISD's curriculum management plan also is guided by legal and local board policy. It includes timelines and teacher expectations for course development, including the scope and sequence of the courses and six-week assessments. The plan also provides a rubric for staff to measure the quality of the district-developed curriculum documents. The plan specifies which staff are responsible for monitoring the curriculum through data, teacher observations, review of lesson plans, and staff discussions, and it provides opportunities for staff feedback.

Bloomington ISD should establish a process to develop, implement, and revise a curriculum management plan.

The superintendent should establish and lead a curriculum management team that includes the curriculum administrator, the director of special programs, campus principals, teachers,

and instructional technology staff. The curriculum management team should:

- develop a guiding statement for the district’s curriculum management plan and set measurable three- to five-year goals with strategic steps at the district, department, and campus levels;
- specify the staff responsible for meeting goals and monitoring progress, and the frequency of these activities;
- develop a timeline to assess the curriculum management plan that includes staff feedback and a schedule for plan revisions; and
- communicate the plan to staff to ensure consistent curriculum delivery and monitoring across campuses.

The curriculum administrator should incorporate the TEKS Resource System into the curriculum management plan, present the plan to the Bloomington ISD board for approval, and update the board quarterly on its progress.

The district could implement this recommendation with existing resources.

GIFTED AND TALENTED EDUCATION (REC. 9)

Bloomington ISD does not identify gifted and talented students adequately or provide staff with the necessary professional development opportunities to implement a comprehensive program for these students.

The Texas Education Code, Section 29.122(a), states, “Using criteria established by the State Board of Education, each school district shall adopt a process for identifying and serving gifted and talented students in the district and shall establish a program for those students in each grade level.”

In August 2019, Bloomington ISD adopted a comprehensive set of policies and procedures for gifted and talented (GT) students, the Bloomington Independent School District Policy and Procedures for Academically Gifted and Talented Students (GT handbook). Bloomington ISD’s GT handbook is aligned with the Texas Education Code and the Texas Administrative Code. However, the district’s practices related to its GT program frequently are not conducted in accordance with the district’s policies and procedures.

Bloomington ISD’s GT handbook states that the district must provide GT assessment opportunities to all students at least once per school year, and all kindergarten students are

**FIGURE 2-8
BLOOMINGTON ISD PERCENTAGE OF IDENTIFIED GIFTED AND TALENTED STUDENTS COMPARED TO STATE AVERAGE, SCHOOL YEARS 2017-18 TO 2020-21**

| SCHOOL YEAR | BLOOMINGTON ISD | STATE AVERAGE |
|-------------|-----------------|---------------|
| 2017-18 | 4.2% | 7.9% |
| 2018-19 | 5.0% | 8.1% |
| 2019-20 | 5.4% | 8.1% |
| 2020-21 | 4.6% | 8.3% |

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2017-18 to 2020-21.

automatically considered for GT services. The policies and procedures also require GT staff to receive the necessary GT training mandated by the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, Section 89.2.

Information gathered during staff interviews suggests that Bloomington ISD is not offering students the GT assessment opportunities outlined in its GT handbook. Campus staff reported that the district has identified few GT students at the elementary school level during the last two school years due to a lack of staff training related to administering the GT student assessments. At the secondary level, the student-and-community-engagement director stated that no process is implemented to identify GT students.

The U.S. Department of Education’s Office for Civil Rights estimates that 6.0 percent of public-school students are enrolled in GT programs, and the National Center for Education Statistics determined that 6.7 percent of public-school students in the U.S. were enrolled in GT programs for school year 2013-14. **Figure 2-8** shows that Texas school districts identified 8.3 percent of students as GT during school year 2020-21, an increase from 7.9 percent of students during school year 2017-18. The percentage of students identified by Bloomington ISD as GT is lower than the state average. The greatest percentage of Bloomington ISD students identified as GT was 5.4 percent during school year 2019-20, which is less than the lowest state average of 7.9 percent for school year 2017-18.

Figure 2-8 shows the percentage of GT students at Bloomington ISD compared to state averages for school years 2017-18 to 2020-21.

In accordance with the Foundation School Program (FSP), a school district is entitled to state funds for each GT student it identifies and serves. However, a district may not receive GT funds for more than 5.0 percent of its student population

FIGURE 2–9
BLOOMINGTON ISD ADVANCED ACADEMIC INDICATORS COMPARED TO STATE AND REGION
SCHOOL YEAR 2019–20

| MEASURE | STATE | REGION 3 (1) | BLOOMINGTON ISD |
|---|-------|--------------|-----------------|
| STAAR percentage rated Masters Grade Level, All Subjects (2) | 18.0% | 16.0% | 4.0% |
| Advanced course/dual-credit course completion | 46.3% | 35.7% | 29.6% |
| AP/IB – Participation (3) | 22.0% | 12.6% | 3.8% |
| SAT/ACT (4) – students tested | 76.7% | 53.2% | 50.9% |
| SAT/ACT – percentage of examinees who scored at or greater than the criterion score | 35.7% | 30.9% | 14.3% |

NOTES:
(1) Region 3=Regional Education Service Center III.
(2) State of Texas Assessments of Academic Readiness (STAAR) percentage rated Masters Grade Level, All Subjects, shows data for school year 2020–21.
(3) Participation rates show the percentage of students in grades 11 and 12 who completed the College Board’s Advanced Placement (AP) examinations or the International Baccalaureate’s (IB) Diploma Program examinations.
(4) SAT and ACT are standardized college admissions tests that measure aptitude and knowledge retention.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

determined by its average daily attendance. For school years 2017–18 and 2020–21, the percentage of Bloomington ISD students identified as GT were 4.2 percent and 4.6 percent, respectively. Both percentages were less than 5.0 percent of the district’s average daily attendance. Therefore, the district’s low rate of identified GT students may have resulted in the district receiving less FSP funding for its GT program.

The Texas Administrative Code, Title 19, Section 89.2, requires educators to have a minimum of 30.0 hours of staff development in GT education to be eligible to teach GT students. Additionally, GT teachers must receive a minimum of 6.0 hours of professional development in GT education annually. Furthermore, administrators and counselors who administer GT program decisions must complete a minimum of 6.0 hours of professional development that includes the nature and needs of GT students and program options. Bloomington ISD’s GT handbook states that all classroom teachers are expected to complete the 30.0-hour mandatory training within one school year.

However, Bloomington ISD is not providing teachers with the necessary GT professional development opportunities to comply with statutory requirements and its own policies and procedures. During onsite interviews, staff reported that a small percentage of teachers received the mandatory GT training. Campus staff at Bloomington Elementary School stated that their school has two teachers that have received the required training and are certified to provide GT instruction. The two certified teachers are tasked with overseeing the campus’ GT program. At Placedo Elementary School, campus staff stated one of the counselors is tasked with conducting all GT student assessments. Campus staff

also reported that the district encourages teachers to become certified to provide GT instruction, but it does not provide any incentives for teachers to receive the certification. Secondary school staff reported that no formal process is implemented to determine professional development needs for their campuses. With limited staff certified to provide GT instruction, the departure of any certified GT teacher has a detrimental effect on the district’s ability to provide GT assessments and services.

Figure 2–9 shows Bloomington ISD’s advanced academic indicators compared to other Region 3 districts and the state. Bloomington ISD students perform at less than state and regional averages for all advanced academic indicators.

The National Association for Gifted Children developed a guide in 2019 to GT programming standards for prekindergarten to grade 12 in six areas: learning and development, assessment, curriculum and instruction, learning environments, programming, and professional development. In the area of curriculum and instruction, the guide states that teachers should “apply the theory and research-based models of curriculum and instruction related to students with gifts and talents and respond to their needs by planning, selecting, adapting, and creating culturally relevant curriculum.”

Bloomington ISD should implement policies and procedures for a GT program to identify and meet students’ instructional needs.

The director of special programs, in collaboration with relevant stakeholders and district staff, should analyze the district’s gifted and talented program to ensure it is:

- adequately identifying students for the district’s GT program;
- providing staff with the necessary support and professional development opportunities to become certified GT service providers; and
- following the policies and procedures outlined in the district’s GT handbook.

The district could implement this recommendation with existing resources.

CAREER AND TECHNICAL EDUCATION (REC. 10)

Bloomington ISD’s Career and Technical Education (CTE) program is not guided by an advisory committee to oversee and evaluate the program.

The Texas Education Code, Section 29.181(2), states, “Each public-school student shall master the basic skills and knowledge necessary for ... gaining entry-level employment in a high-skill, high-wage job or continuing the student’s education at the postsecondary level.” Therefore, students that do not pursue postsecondary education should acquire the necessary skills to obtain high-skill, high-wage employment after graduation. The Texas Workforce Commission defines high-wage employment as an annual wage that is more than \$38,013, the median wage for Texas workers in 2020. High-skill education is defined as a program of study that includes multiple opportunities to enter careers, including industry-based certifications, postsecondary academic certifications, and academic degrees. School districts can provide students with the necessary skills and education to earn high-skill, high-wage jobs by offering them the opportunity to enroll in rigorous, high-quality CTE programs.

Pursuant to the Texas Education Code, Section 48.106(a), school districts are entitled to receive funds for each full-time-equivalent student enrolled in an approved CTE program in grades seven to 12. TEA has established 53 approved CTE programs of study for districts to select and implement. The CTE programs prepare students for high-skill, high-wage occupations that meet Texas labor market criteria including projected job growth, annual job openings, and the state median wage.

At Bloomington ISD, a high school teacher serves as the CTE coordinator and oversees the CTE program with the principal of the secondary campuses. Bloomington ISD had 3.9 certified CTE teachers during school year 2020–21.

**FIGURE 2–10
BLOOMINGTON ISD CAREER AND TECHNICAL EDUCATION
COHERENT SEQUENCE GRADUATES COMPARED TO
REGIONAL AND STATE AVERAGES
SCHOOL YEARS 2015–16 TO 2019–20**

| YEAR | BLOOMINGTON ISD | REGION 3 | STATE |
|---------|-----------------|----------|-------|
| 2015–16 | 55.1% | 50.7% | 47.8% |
| 2016–17 | 58.0% | 53.4% | 50.5% |
| 2017–18 | 60.5% | 57.7% | 58.4% |
| 2018–19 | 27.8% | 60.1% | 59.0% |
| 2019–20 | 43.6% | 62.7% | 58.5% |

NOTE: Region 3=Regional Education Service Center III.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2020–21.

Bloomington ISD offers four CTE programs to high school students, including agriculture, business management, teaching and training, and welding. **Figure 2–10** shows the participation rate of students in Bloomington ISD’s CTE program compared to students in other Region 3 districts and the state for school years 2015–16 to 2019–20.

As shown in **Figure 2–10**, the participation rate in Bloomington ISD’s CTE program has decreased among graduates in recent years. During school year 2017–18, 60.5 percent of Bloomington ISD graduates enrolled in at least one CTE course as part of their four-year plans of study. However, during school years 2018–19 and 2019–20, the CTE participation rates were less than state and regional averages, as 27.8 percent (2018–19) and 43.6 percent (2019–20) of Bloomington ISD graduates enrolled in at least one CTE course.

During interviews, staff said that Bloomington ISD’s CTE program did not include an advisory committee; a comprehensive, long-term plan; or a process to evaluate the CTE program’s effectiveness regularly. According to staff, principals and counselors are responsible for evaluating the program. However, no specified guidelines, criteria, or processes are in place for evaluating CTE programs of study, and community representatives and businesses are not included in the evaluation or selection of CTE program offerings. Senior-level staff reported that businesses are not part of the CTE program due to a lack of local businesses in the Bloomington area. Additionally, Bloomington ISD’s CTE program does not have any long-term, strategic goals with which to evaluate the program’s effectiveness.

The Texas plan pursuant to the federal Strengthening Career and Technical Education for the 21st Century Act (Perkins

V) directs districts to utilize local labor market data, CTE advisory committees, and other stakeholders to determine which CTE programs of study best fit their needs. Typically, a CTE advisory committee consists of CTE staff, campus and district administrators, and representatives of industry and the business community. A CTE advisory committee also may include a parent and a student. In addition to selecting the CTE programs of study, CTE advisory committees are tasked with evaluating CTE programs. Perkins V requires eligible school districts receiving a Perkins Basic grant to complete a comprehensive local needs assessment (CLNA) once every two years. TEA published the 2020–21 Texas Perkins V CLNA guidebook to serve as a resource for districts to evaluate their CTE programs. The CLNA guidebook analyzes CTE programs in six categories: student performance; size, scope, and quality of programs; labor market alignment; implementation of CTE programs of study; faculty and staff recruitment, retention, and training; and improving access and equity. Although Bloomington ISD has not applied for a Perkins Basic grant, it is a recommended best practice for districts to enact robust evaluation systems to routinely assess the implementation and outcomes of their CTE programs. Hanover Research recommends that districts utilize implementation rubrics, instructional observations, stakeholder surveys, academic outcomes, and career outcomes when evaluating the effectiveness of CTE programs.

Beyond CTE program selection and evaluation, CTE advisory committees may:

- recommend industry validated credentials, licenses, or certifications;
- evaluate facilities and program equipment;
- assist with instructional and learning experience by offering training sites, organizing plant tours and field experiences, and locating resources;
- assist with job opportunities and student job placements;
- advise on short-term and long-term plans; and
- build interest and relationships between the program and the community organizations through partnerships.

Bloomington ISD should establish a CTE advisory committee, develop a CTE plan, and evaluate the district's CTE program regularly.

Bloomington ISD's CTE advisory committee should include staff, campus and district administrators, and representatives of industry and the business community. Bloomington ISD's CTE plan should include education programs that offer a sequence of courses that provide students with coherent and rigorous content. The CTE content should be aligned with challenging academic standards, relevant technical knowledge, and skills needed to prepare students for further education and careers in current or emerging professions. Bloomington ISD's CTE advisory committee should evaluate the CTE program regularly. The district can utilize the 2020–21 Texas Perkins V CLNA guidebook to ensure that its CTE program evaluation is comprehensive and effective.

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.

ENGLISH AS A SECOND LANGUAGE CERTIFICATION

Bloomington ISD staff recognize that EL students are a growing population, and the district has implemented several strategies to help meet the needs of these students. The district has begun developing individualized plans for each EL student and established an outreach program that includes home visits to parents. In addition, Bloomington ISD is encouraging all teachers to become certified in teaching English as a Second Language (ESL) to provide content-based ESL instruction. Content-based instruction enables teachers to provide ESL instruction in all content areas. At the time of the onsite visit, the elementary campuses had implemented content-based instruction, and students in other grades received ESL services outside the general education classroom. Although the district pays the cost of registering for the certification test, Bloomington ISD offers no other incentives for teachers to become ESL-certified. The district should explore financial or other incentives to help increase the number of teachers holding an ESL certification and expand content-based instruction districtwide.

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.

3. BUSINESS SERVICES MANAGEMENT

ACCOMPLISHMENTS

- ◆ Bloomington ISD requires the digitization of paper receipts and supporting documentation when making purchases.
- ◆ Bloomington ISD contracts with the regional Education Service Center III to perform bank account reconciliation to segregate duties in its Business Office, which has few staff.

FINDINGS

- ◆ Bloomington ISD lacks a clearly defined contract management function to ensure adequate administration, evaluation, and oversight of district contracts.
- ◆ Bloomington ISD does not have written procedures for the budget development process that are aligned with district and campus improvement plans, nor does the process effectively incorporate input from campus and community stakeholders.
- ◆ Bloomington ISD lacks a local, board-adopted fund balance policy to guide the district in short-term and long-term planning.
- ◆ Bloomington ISD does not use a cash-flow forecast to ensure that adequate funds are available to meet the district's long-term cash requirements.
- ◆ Bloomington ISD does not have a process to dispose of capital assets after they are no longer useful.

RECOMMENDATIONS

- ◆ **Recommendation 11: Implement controls to improve contract management functions.**
- ◆ **Recommendation 12: Develop and implement a budget development process that incorporates input from campuses and departments and aligns with campus and district improvement plans.**
- ◆ **Recommendation 13: Establish a fund balance policy to protect the district's fund balance and ensure that it remains sufficient to address unforeseen events.**

- ◆ **Recommendation 14: Develop a formal cash-flow process to monitor the district's cash requirements.**
- ◆ **Recommendation 15: Develop procedures to dispose of surplus assets.**

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.

Budget preparation and administration are critical to overall district operations. Financial management includes 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 training staff.

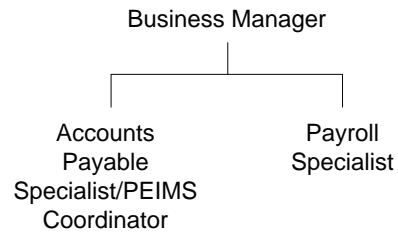
Managing investments includes identifying those with maximum interest-earning potential while safeguarding funds and ensuring liquidity to meet fluctuating cash-flow demands. Forecasting and managing revenue include efficient tax collections to enable a district to meet its cash-flow needs, earn the 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's 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 risks is dependent on the organizational structure of the district.

School districts in Texas also are required to follow federal and state laws and procedures applicable to purchasing. The purpose of competitive bidding requirements in the Texas Education Code, Section 44.031, is 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, available as a resource to school districts.

Bloomington Independent School District’s (ISD) business manager oversees the Business Office, which is responsible for the district’s accounting, payroll, purchasing, and risk management functions. The business manager also serves as the financial adviser to the superintendent and the Bloomington ISD Board of Trustees (board). The business manager supervises an accounts payable specialist/Public Education Information Management System (PEIMS) coordinator and a payroll specialist. The accounts payable specialist processes vendor invoices and oversees the district’s PEIMS transactions, and the payroll specialist processes payroll. Bank reconciliation is performed by regional Education Service Center III (Region 3). **Figure 3–1** shows the organization of Bloomington ISD’s Business Office.

**FIGURE 3–1
BLOOMINGTON ISD BUSINESS OFFICE ORGANIZATION
SCHOOL YEAR 2021–22**



NOTE: PEIMS=Public Education Information Management System.
SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

Figure 3–2 shows Bloomington ISD’s actual financial data for school years 2017–18 to 2019–20 and budgeted financial data for school year 2020–21. The highest expenditure categories for school year 2019–20 were instruction, which constituted 45.7 percent of total operating expenditures; facilities, which constituted 14.7 percent; and general administration, which constituted 7.5 percent.

The Legislative Budget Board’s (LBB) School Performance Review Team selected three school districts as peer districts for Bloomington ISD: Odem-Edroy ISD, Santa Gertrudis

**FIGURE 3–2
BLOOMINGTON ISD ACTUAL AND BUDGETED GENERAL FUND FINANCIAL DATA
SCHOOL YEARS 2017–18 TO 2020–21**

| CATEGORY (1) | 2017–18 ACTUAL | 2018–19 ACTUAL | 2019–20 ACTUAL | 2020–21 BUDGETED |
|---|--------------------|---------------------|--------------------|--------------------|
| Revenue | | | | |
| Local Tax | \$1,943,478 | \$1,879,274 | \$2,185,980 | \$2,083,873 |
| Other Local and Intermediate | \$657,357 | \$757,793 | \$132,874 | \$252,589 |
| State | \$6,025,220 | \$6,072,015 | \$5,789,425 | \$6,839,013 |
| Federal | \$1,080,425 | \$1,326,040 | \$904,465 | \$808,598 |
| Total Revenue (2) | \$9,706,480 | \$10,035,122 | \$9,012,744 | \$9,984,073 |
| Expenditures | | | | |
| 11 Instruction; 95 Instruction | \$4,610,416 | \$4,505,742 | \$4,550,090 | \$5,194,553 |
| 12 Instructional Resources and Media Services (3) | \$84,906 | \$33,479 | \$43,985 | \$313,035 |
| 13 Curriculum and Staff Development | \$234,013 | \$206,880 | \$148,475 | \$187,497 |
| 21 Instructional Leadership | \$0 | \$0 | \$49,673 | \$2,502 |
| 23 School Leadership | \$518,830 | \$535,409 | \$604,219 | \$698,006 |
| 31 Guidance and Counseling Services | \$252,225 | \$240,249 | \$291,627 | \$268,240 |
| 32 Social Work Services | \$0 | \$0 | \$0 | \$0 |
| 33 Health Services | \$150,941 | \$145,610 | \$205,565 | \$167,631 |
| 34 Transportation | \$420,539 | \$417,765 | \$362,053 | \$357,888 |

FIGURE 3–2 (CONTINUED)
BLOOMINGTON ISD ACTUAL AND BUDGETED GENERAL FUND FINANCIAL DATA
SCHOOL YEARS 2017–18 TO 2020–21

| CATEGORY (1) | 2017–18 ACTUAL | 2018–19 ACTUAL | 2019–20 ACTUAL | 2020–21 BUDGETED |
|--|---------------------|---------------------|--------------------|---------------------|
| Expenditures (continued) | | | | |
| 35 Food Services (4) | \$593,722 | \$605,557 | \$602,089 | \$551,172 |
| 36 Extracurricular | \$491,568 | \$511,371 | \$438,050 | \$391,650 |
| 41, 92 General Administration | \$761,642 | \$779,657 | \$751,409 | \$705,846 |
| 51 Facilities Maintenance and Operations (5) | \$1,444,154 | \$1,447,104 | \$1,467,040 | \$1,474,142 |
| 52 Safety and Monitoring | \$72,581 | \$83,042 | \$85,201 | \$80,659 |
| 53 Data Processing Services | \$29,403 | \$31,634 | \$45,186 | \$49,291 |
| 61 Community Services | \$0 | \$0 | \$0 | \$0 |
| 72 Debt Service | \$73,587 | \$74,057 | \$143,983 | \$71,000 |
| 81 Capital Outlay | \$11,697,707 | \$1,256,558 | \$175,006 | \$111,255 |
| Total Expenditures | \$21,436,234 | \$10,874,114 | \$9,963,651 | \$10,624,367 |

NOTES:

- (1) Category numbers are the numerations used by the Texas Education Agency to classify expenditures.
- (2) Total revenue excludes contributions from the Teacher Retirement System of Texas.
- (3) The Instructional Resources and Media Services function code previously was labeled Library and Media Services.
- (4) The Food Services function code represents the money spent from the district's general fund on activities whose purpose is managing a school's or district's food services program and serving regular and incidental meals, lunches, or snacks in connection with school activities. Food Services operations maintain their own funds, and this amount remains \$0 unless the district's food services fund operates at a loss for the school year and the district must cover food service losses from its general fund.
- (5) The Facilities Maintenance and Operations function code previously was labeled Plant Maintenance and Operations.

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2017–18 to 2020–21.

ISD, and Skidmore-Tynan ISD. Peer districts are districts similar in size and other characteristics to Bloomington ISD that are used for comparison purposes. **Figure 3–3** shows Bloomington ISD's tax rate compared to those in the peer districts. The tax rate, set by the local district pursuant to the taxation laws of the state, drives local revenue. Bloomington ISD had a lower tax rate than all peer districts for school year 2020–21.

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, which is intended to hold public schools accountable for the quality of their financial management practices and for the improvement of those practices. The goal of FIRST 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 indicating a district's success in combining cost-effective spending with the achievement of measurable student academic progress. Smart Score lists

FIGURE 3–3
BLOOMINGTON ISD TAX RATE COMPARED TO PEER DISTRICTS
SCHOOL YEARS 2018–19 TO 2020–21

| DISTRICT | 2018–19 | 2019–20 | 2020–21 |
|------------------------|---------------|---------------|---------------|
| Bloomington ISD | 1.4002 | 1.2317 | 1.2281 |
| Odem-Edroy ISD | 1.6700 | 1.5683 | 1.4084 |
| Santa Gertrudis ISD | 1.3648 | 1.2928 | 1.1373 |
| Skidmore-Tynan ISD | 1.5088 | 1.3870 | 1.2818 |

NOTE: Property taxes are expressed as a rate in dollars and cents per \$100 of taxable value.

SOURCE: Texas Education Agency, School District Adopted Tax Rates, school years 2018–19 to 2020–21.

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 2020 Smart Score rating results use data from school years 2016–17 to 2018–19.

Figure 3–4 shows Bloomington ISD's FIRST and Smart Score ratings compared to peer districts. Bloomington ISD scored a FIRST rating of C=meets standard for school year 2020–21, compared to its peer districts, which all scored a

**FIGURE 3-4
BLOOMINGTON ISD FIRST AND SMART SCORE RATINGS COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2020-21**

| DISTRICT | FIRST RATING (1) | SMART SCORE (2) | SMART SCORE ACADEMIC PERFORMANCE RATING | SMART SCORE SPENDING RATING |
|---------------------|-------------------|-----------------|---|-----------------------------|
| Bloomington ISD | C= Meets Standard | 2 | Very low academic progress | Average spending |
| Odem-Edroy ISD | A=Superior | 3.5 | Low academic progress | Very low spending |
| Santa Gertrudis ISD | A=Superior | 5 | Very high academic progress | Very low spending |
| Skidmore-Tynan ISD | A=Superior | 4 | High academic progress | Low spending |

NOTES:

(1) Financial Integrity Rating System of Texas (FIRST) scores for school year 2020-21 are based on school year 2019-20 data, the most recent data available.

(2) Smart Scores for school year 2020-21 are based on a three-year average of data from school years 2016-17, 2017-18, and 2018-19.

SOURCES: Texas Education Agency, Financial Integrity Rating System of Texas, school year 2020-21; Texans for Positive Economic Policy, 2020 Smart Scores.

FIRST rating of A=Superior. Bloomington ISD’s 2020 Smart Score was 2, with a performance rating of very low academic progress and a spending rating of average. Bloomington ISD’s 2020 Smart Score rating is lower than all the peer districts and shows the lowest academic performance rating.

Bloomington ISD has developed purchasing requisition instructions, which the district provides on the Business Office page of its website for all campus and department staff. The instructions document lists steps required to generate a valid purchase order.

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

The district stores surplus assets in locations throughout the campuses. 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.

Bloomington ISD’s external auditor found no instances of noncompliance or other material weaknesses in the district’s financial management during the last five years’ financial audits. For school year 2020-21, external auditors noted findings based on the district’s improper use of budget amendments resulting in over expenditures in several funds and in the general fund. Auditors reported similar findings in the two previous school years’ reports. Auditors recommended that the district implement additional procedures for

monitoring the budget periodically to develop and approve any necessary amendments.

Additionally, the district reported several incidents of financial improprieties during previous school years. According to interviews with the superintendent and board members, the district terminated the employment of its former chief financial officer (CFO) in January 2020 for alleged misuse of district funds, which included making purchases on district credit cards without purchase orders or receipts. Bloomington ISD also conducted a forensic audit in September 2019, which found several discrepancies. According to the superintendent, the audit determined that staff may have misused more than \$500,000 in federal funding. This information was submitted to county authorities, which are investigating whether the activity was a crime.

DETAILED ACCOMPLISHMENTS

DIGITAL DOCUMENTATION

Bloomington ISD requires the digitization of paper receipts and supporting documentation when making purchases. This process significantly decreases the use of paper, reduces the district’s risk of fraud, and enhances the district’s ability to store documents safely. Beginning in 2021, the business manager implemented a process that requires staff making a requisition to scan and upload receipts and all supporting documents to the financial management software system. Digitizing supporting documentation enables the district to store documentation safely and efficiently for long periods. Digitization also is a cost-effective process that eliminates the need for paper, copier ink, and physical storage. Additionally, the digitization of receipts and other documentation help to

ensure that the district is less susceptible to staff making unauthorized purchases.

OUTSOURCING OF BANK ACCOUNT RECONCILIATION

Bloomington ISD contracts with regional Education Service Center III to perform bank account reconciliation to segregate duties in its Business Office, which has few staff. Bank reconciliation ensures that all transactions recorded in the bank statements have been reviewed and checked, thus reducing the incidence of errors in the data used to prepare accounts. Additionally, bank reconciliation is an essential internal control tool necessary in preventing and detecting fraud. The district contracted with Region 3 in response to the investigation into the former CFO for misuse of funds. The district determined that the Business Office had difficulty implementing processes to provide oversight, find errors, and prevent fraud. Utilizing Region 3’s services enable the district to maintain a secure environment without employing additional staff.

DETAILED FINDINGS

CONTRACT MANAGEMENT (REC. 11)

Bloomington ISD lacks a clearly defined contract management function to ensure adequate administration, evaluation, and oversight of district contracts.

Board Policy CH (LOCAL) authorizes the superintendent to sign contracts and requires board approval for any budgeted purchase valued at \$25,000 or more. District staff stated that the business manager and the superintendent are the only two staff who may sign contracts on the district’s behalf. The LBB review team visited the district in October 2021. At the time of the onsite visit, the district purchased most goods and services through purchasing cooperatives and did not have many active contracts. During interviews, staff reported that they typically obtain three bids for a contracted service, and they share feedback regarding vendor performance informally with the business manager. **Figure 3–5** shows primary examples of Bloomington ISD’s existing contracts.

The district is developing a Business Office procedures manual that contains general guidelines for purchase requisitions and purchase orders; however, at the time of the review, the district did not provide sufficient guidance regarding contract management. This lack of direction has resulted in ineffective processes for administering and managing awarded contracts.

**FIGURE 3–5
BLOOMINGTON ISD’S CONTRACTS
SCHOOL YEAR 2021–22**

| DEPARTMENT OR FUNCTION | EXAMPLES OF CONTRACTED SERVICES |
|------------------------------|--|
| Technology Department | Internet filtering, hot spots, and asset tracking |
| Educational Service Delivery | Instructional programs, migrant student support, and a social worker |
| Maintenance Department | Landscaping and uniforms |
| Business Office | Copiers |

SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

For example, the district does not have a master contract file in a central location where all contracts are kept. In interviews, staff said that they knew contracts were in place for their departments or campuses, but they reported not knowing where the hard copies of these contracts were located.

The lack of a centralized, master file of original contracts exacerbates the risk that the district has contracts of which business office staff are unaware, and the business manager and superintendent do not have immediate access to all original contracts.

Additionally, the district lacks a process for reviewing contracts. The district has no procedures to request or document vendor performance, nor does it have a formal process for campuses and departments to provide feedback regarding vendor performance. Bloomington ISD also does not maintain a contract renewal calendar; therefore, it does not have a process to notify staff when contracts are set to expire.

Failure to monitor contracts for compliance and to conduct cost-benefit analyses on renewals increases the district’s risk of overspending on services and not receiving the best value for its investments. In addition, by not appropriately documenting and monitoring contract and vendor performance, the district might not have access to legal remedies against breach of contract, unsatisfactory performance by a vendor, or any other loss to the district resulting from a service contract or provider.

The district also does not have a designated contract manager; instead, principals and department heads oversee contracts managed by their campus or department.

The Texas Comptroller of Public Accounts publishes the *State of Texas Procurement and Contract Management Guide*, which provides a framework for government procurement that applies to all governmental entities, including school districts. According to the guide, a contract manager's primary responsibilities include the following tasks:

- participating with the procurement team in solicitation development and the review of contract documents;
- serving as the primary point of contact for the district's communication with the contractor regarding all matters pertaining to the contract;
- managing any district property used in contract performance (e.g., computers, telephones, identification badges);
- implementing a quality-control and contract-monitoring process;
- monitoring the contractor's progress and performance to ensure goods and services procured conform to the contract requirements and keeping timely records;
- consulting with the district's legal counsel to address concerns or issues;
- managing, approving, and documenting changes to the contract through the amendment process authorized by the contract terms;
- inspecting and approving the products or services by submitting a written document accepting the deliverables or obtaining documentation from the end users for receipt that inspection and approval have been completed;
- verifying accuracy of invoices and authorizing payments consistent with the contract terms;
- monitoring the contract budget to ensure sufficient funds are available throughout the term of the contract;
- identifying and resolving disputes with the contractor in a timely manner;
- exercising remedies available to the district, as appropriate, when a contractor's performance is deficient;
- maintaining appropriate records in accordance with the records retention schedule;

- confirming all products or services have been delivered and delivery is completed before the contract's expiration date; and
- performing contract closeout processes by ensuring that the contract file contains all necessary documentation.

Without contracting guidance from the Business Office, contract managers throughout the district may not be performing these duties adequately. The absence of formal policies, processes, and procedures for large and small contracts places the district at risk for rising costs, poor-quality services or products, and inadvertent noncompliance with records retention requirements pursuant to the Texas Education Code, Section 44.003.

Bloomington ISD should implement controls to improve contract management functions.

The business manager should perform the following tasks:

- establish a central file in the Business Office of all original contracts, stipulating the retention period for each type of contract based on the records retention schedule;
- assign a contract manager to each contract and have them sign an agreement stating that they understand their roles and responsibilities as outlined in the *State of Texas Procurement and Contract Management Guide*;
- establish a procedure for the contract manager to monitor all contracts and perform a cost-benefit analysis evaluation before renewing contracts; and
- include in the completed Business Office procedures manual the evaluation of contractors, the steps for notifying a vendor when performance is substandard, and the steps for terminating a vendor contract when remedies have been unsuccessful.

The district could implement this recommendation with existing resources.

BUDGET DEVELOPMENT (REC. 12)

Bloomington ISD does not have written procedures for the budget development process that are aligned with district and campus improvement plans, nor does the process effectively incorporate input from campus and community stakeholders.

Bloomington ISD's budget process is not defined in any formal document, and the district has no budget calendar that details the steps in the process and when they occur. Based on interviews with staff, the district's budget process begins annually in January, when the Business Office prepares a preliminary budget for each campus and department for the following school year. The budget for each campus and department is developed based on the previous school year's budget. Each campus and department receives a copy of the previous year's line-item budget showing the adopted budget, budget changes, amended budget, transactions, encumbrances, remaining balance, and proposed budget. The Business Office provides each principal and department head with the allotment for the campus or department. Each principal or department head then decides how the funds will be used, with no guidelines or instructions from the district on how to allocate the funds.

Although this practice provides principals and department heads with some discretion regarding how their budgets are allocated, they are not involved in determining the allocation amounts, which are set by the business manager each year.

A budget amendment must be initiated if additional funds are required during the school year. Department heads and principals must submit a written request explaining the need for additional funds to the business manager. If approved, the business manager prepares an amendment for board consideration.

Limiting principals' and department heads' involvement in the budget development process prevents valuable input from those most familiar with daily operations. This lack of involvement could lead to apathy in budget administration and to the need for unnecessary budget amendments resulting from poor budget planning.

During onsite interviews, staff reported that the district's budget development process operates independently from the development processes of the campus improvement plans (CIP) and the district improvement plan (DIP). Separate from the district's budget process, Bloomington ISD annually develops a DIP, and each campus develops a CIP. These plans are intended to improve school performance by establishing annual goals, objectives, and strategies for the district and individual campuses based on analysis of student achievement, graduation rates, retention rates, and other federal and state accountability indicators. Some of these goals and strategies require funds to be accomplished, and the plans outline the

expected funding sources. The campus and department funding established during the district's budget development process is not connected to the goals outlined in the DIP or CIPs. Instead, Bloomington ISD builds operating budgets based on previous years' activities.

Additionally, the board often adopts the budget before the improvement plans have been developed. Although no evidence shows that the district's budget and improvement plan goals contradict each other, making budgetary decisions that are not based on 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.

Georgetown ISD publishes its Budget Guidelines, a document that contains the district's budget development process, a budget preparation overview, reference information, and budget codes. The guidelines include a budget calendar and enrollment projections that assist the district to develop a budget with as much information as possible in clearly identified steps. South Lake Carroll ISD also publishes its Budget Procedure Manual to guide the district in its budget development.

Bloomington ISD should develop and implement a budget development process that incorporates input from campuses and departments and aligns with campus and district improvement plans.

The business manager should develop written procedures and prepare a budget calendar to guide the budget development process. TEA's Financial Accountability System Resource Guide (FASRG) provides extensive information regarding the entire budgeting process, including a module dedicated to budgeting. The business manager should review the FASRG budgeting module to become familiar with all areas of the budgeting process. Using that knowledge, the district could develop written guidelines that establish procedures for budget planning, preparation, and monitoring.

The superintendent, in collaboration with the business manager, should set a budget calendar for the district that coincides with the development of the DIP and CIPs. The budget calendar should show activities, completion dates, and the position responsible for each activity. According to the National Center for Education Statistics, the following three steps are best practices used to prepare a new budget calendar:

**FIGURE 3–6
BLOOMINGTON ISD GENERAL FUND BALANCES
SCHOOL YEARS ACTUAL 2017–18 TO 2019–20 AND BUDGETED 2020–21**

| CATEGORY | 2017–18 | 2018–19 | 2019–20 | 2020–21 (1) |
|--------------------------------------|---------------|-------------|-------------|-------------|
| Beginning fund balance | \$2,519,763 | \$1,473,157 | \$1,084,119 | \$989,356 |
| Ending fund balance | \$1,473,157 | \$1,084,119 | \$989,356 | \$1,003,098 |
| Increase/(Decrease) | (\$1,046,606) | (\$389,038) | (\$94,763) | \$13,742 |
| Percentage change from previous year | (41.5%) | (26.4%) | (8.7%) | 1.4% |

NOTE: (1) Bloomington ISD provided budgeted amounts for school year 2020–21. At the time of the report, Public Education Information Management System (PEIMS) data had not been released for that year.

SOURCES: Texas Education Agency, PEIMS Financial Data, school years 2017–18 to 2019–20; Bloomington ISD, October 2021.

- determine the level of detail needed;
- identify all the activities that must be included in the calendar and arrange them in chronological order; and
- assign completion dates to each activity on the calendar.

One example of a budget calendar is available on Austin ISD’s website at www.austinisd.org/budget.

The district’s budget plan and improvement plans should be developed and reviewed by the same staff, including the business manager, campus administrators, and any DIP and CIP committee members. The business manager should develop and implement a formal process to require that district and campus budgets include any resources and funding allocated to the goals and objectives of the DIP and CIP. As campus administrators and department heads review their budgets, they should identify and ensure that the DIP and CIPs goals and objectives are incorporated into the budget. Additionally, as the board reviews and approves the district budget, board members should check to see whether the costs of the programs to meet the goals and objectives outlined in the DIP and CIPs are included in the district budget.

The district could implement this recommendation with existing resources.

FUND BALANCE POLICY (REC. 13)

Bloomington ISD lacks a local, board-adopted fund balance policy to guide the district in short-term and long-term planning.

A fund balance is the amount of district assets in excess of liabilities and typically include investments, delinquent taxes, accounts receivable, and inventories. A fund balance

represents resources that the district holds in reserve to address unforeseen financial impacts or variations in the timing of the receipt of state and local revenue sources. Without such a policy, the reserves in the district’s general fund that supports daily operations could decrease to a level insufficient to provide adequate protection against unexpected increases in normal operating costs or unforeseen financial crises. Without planning, the district may be unable to meet its financial obligations under certain circumstances.

The district’s general fund represents the amount of revenue greater than expenditures and is of primary significance because this fund finances most district functions. Districts typically use the fund balance to meet payroll and pay other operating costs annually during August and September, months when state funding payments are delayed. A sufficient fund balance continues the district’s operations with adequate cash flow until tax collections begin annually in October.

Figure 3–6 shows Bloomington ISD’s fund balances for school years 2017–18 to 2019–20 and the 2020–21 budgeted balance.

TEA recommends maintaining a minimum unrestricted fund balance of approximately two and one-half months of operating expenditures. Bloomington ISD’s fund balance did not meet this standard for school years 2017–18 to 2019–20.

District financial statements for fiscal year 2020 and the previous two fiscal years state, “The district has also adopted a policy to strive to maintain a minimum fund balance in the general fund of 25 percent of the total operating expenditures.” However, the board policy manual does not include this policy. Board Policy CEA (LEGAL) addresses financial exigency and does not set a target general fund balance.

The district’s external auditors include a statement of changes in fund equity in the annual financial audit each fiscal year.

This report is the only review of fund balance the district conducts each year. The business manager reported being aware of the decrease in the fund balance, but the district does not have a process for forecasting fund balances, nor does it have requirements in place to govern expectations for the general fund balance.

The fund balance information included in the district's financial statements is minimal and has not been used as a tool to discuss the district's overall financial position. The Management Discussion and Analysis (MD&A) in the financial statements is intended to provide readers with an overview and analysis of the statements. The auditor presented the fiscal year 2020 financial statements to the board in January 2021 and noted that the district's general fund balances had decreased from the previous year. The auditor noted that balances were sufficient for one and one-third months of operating expenses, but board minutes do not record further discussion of the subject.

The Governmental Accounting Standards Board, an independent organization that standardizes state and local accounting and financial reporting, established the following five categories that designate how a school district can expend a fund balance:

- nonspendable – amounts that are not in spendable form or are required to be maintained intact;
- restricted – amounts that may be spent only for specific purposes because of local, state, or federal laws, or externally imposed conditions by grantors or creditors;
- committed – amounts dedicated to specific purposes by the board;
- assigned – amounts the district intends to use for a specific purpose; and
- unassigned – amounts that are available for any purpose.

Figure 3–7 shows the amounts in each category of Bloomington ISD's general fund balance for the past three fiscal years. Total fund balances decreased by 32.8 percent from school years 2017–18 to 2019–20.

School districts accumulate fund balances to cover cash-flow deficits, demonstrate financial stability, and establish financial reserves to meet unexpected expenses. TEA recommends that each district regularly develops fund

FIGURE 3–7
BLOOMINGTON ISD GENERAL FUND BALANCES BY
CATEGORY, SCHOOL YEARS 2017–18 TO 2019–20

| CATEGORY | 2017–18 | 2018–19 | 2019–20 |
|----------------------------|--------------------|--------------------|------------------|
| Prepaid nonspendable (1) | \$0 | \$0 | \$103,150 |
| Other nonspendable | \$0 | \$0 | \$206,258 |
| Unassigned | \$1,473,157 | \$1,084,119 | \$679,948 |
| Total fund balances | \$1,473,157 | \$1,084,119 | \$989,356 |

NOTE: (1) Prepaid nonspendable amounts include costs applicable to subsequent accounting periods.

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2017–18 to 2019–20.

balance forecasts for the general fund to ensure its compliance with fund balance requirements. TEA has set a rule to compute a district's optimum fund balance, which is the estimated amount to cover cash-flow deficits in the general fund for the fall period in the following fiscal year, plus estimated average monthly cash disbursements of the general fund for the nine months following the fiscal year. Although districts no longer are penalized for failure to maintain an optimum fund balance, a decreasing or low general fund unassigned fund balance is a critical indicator used to identify districts with circumstances that could lead to financial insolvency. FASRG's Financial Accounting and Reporting Appendices contain a fund balance projection report available for district use.

Maintaining a sufficient fund balance can prevent districts from facing borrowing costs when they need to cover cash-flow deficits. It results in higher bond ratings, which reduce interest costs, while enabling the district to respond to unforeseen costs without interruptions in service.

Some districts adopt board policies to ensure that fund balances are maintained at an appropriate level. Keller ISD has established Board Policy CE (LOCAL), which directs district staff to calculate and maintain a committed fund balance ranging from 17.0 percent to 25.0 percent of the district's initial adopted operating budget each year. Any changes to this mandate must be approved by the board.

Bloomington ISD should establish a fund balance policy to protect the district's fund balance and ensure that it remains sufficient to address unforeseen events.

The board should adopt a fund balance policy that articulates a framework and process for building and maintaining the unassigned fund balance at an acceptable level. The business

manager should review the fund balance levels by month for the most recent three fiscal years and determine the necessary level of fund balance to meet the district's needs. The business manager should consider short-term and long-term fund balance goals. This process also should include a review of TEA's optimal fund balance worksheets to ensure that Bloomington ISD fund balance requirements meet the district's needs. Board policy should address acceptable uses of any unassigned fund balance that exceeds the minimum included in the policy. The policy also should include a plan to restore the fund balance if it decreases to less than the identified level.

This recommendation could be implemented with existing resources.

CASH-FLOW FORECAST (REC. 14)

Bloomington ISD does not use a cash-flow forecast to ensure that adequate funds are available to meet the district's long-term cash requirements.

The Government Finance Officers Association describes a cash-flow forecast as an estimate of cash transactions (i.e., cash receipts and disbursements) during a specified period. When used as a cash management guide, a cash-flow forecast can lead to the optimized use of funds and ensure sufficient liquidity. However, Bloomington ISD does not use a formal cash-flow forecasting model. Instead, staff rely on the district's historical pattern of spending when determining whether to transfer funds among investment and depository accounts. The business manager said that a cash-flow forecast is unnecessary because the district's main cash outflows follow predictable patterns. The district disburses vendors' checks weekly and processes payroll monthly. Because the Business Office can estimate these amounts reasonably in advance, it can transfer funds into the correct account the day before disbursing these payments. Although the district has had sufficient cash available to meet its obligations during previous school years, its fund balance has declined for the past three fiscal years. The business manager has developed an informal method of monitoring cash-flow positions, but the district's continuity of operations is at risk if the business manager leaves the district's employment.

Many school districts use cash-flow forecasts to monitor their cash positions and ensure that adequate funds are available to meet cash requirements. These practices help ensure that district management can anticipate the need to borrow funds to meet financial obligations in advance of the actual need. This practice provides the districts with adequate time to

make decisions regarding expenditure reductions or to decide on the borrowing method that will reduce the total cost to the district. Successful school districts forecast cash flow for at least 12 months from the current month and update forecasts each month as needed. A variety of cash-flow forecasting models are available for school districts. Region 3 provides a link on its website to a Cash Flow Template spreadsheet, which provides a basic cash-flow forecasting model with formulas that automatically allocate state and federal revenues and debt service.

Bloomington ISD should develop a formal cash-flow process to monitor the district's cash requirements.

After researching available cash-flow models, the business manager should implement the model most appropriate to the district. The business manager should ensure that the cash-flow forecasting model projects general fund revenues and expenditures by month, debt service revenues and expenditures, and federal revenues, including grants. When the cash-flow model is implemented, the business manager should document its use and include it in the Business Office procedures manual.

This recommendation could be implemented with existing resources.

DISPOSAL OF ASSETS (REC. 15)

Bloomington ISD does not have a process to dispose of capital assets after they are no longer useful.

Asset disposal is the removal of an asset from an organization's accounting records. Districts may dispose of assets if it is fully depreciated, or if it is sold at a gain or loss because it is no longer useful or needed. Board Policy CI (LOCAL) authorizes the superintendent to dispose of unnecessary district property for fair market value, or according to administrative discretion if the property has no value. According to information from staff interviews, Bloomington ISD uses a recycling company to dispose of technology equipment, and that company provides a certificate of destruction for the devices it collects.

However, the district has no formal process for disposing of equipment other than technology. The lack of published guidelines for asset disposal has resulted in the accumulation of stored surplus property. Staff reported that the process for removing obsolete assets other than technology, such as old and excess furniture, is that maintenance staff store these objects in unused rooms throughout the district. Staff also reported that the Maintenance Department periodically

disposed of old and excess furniture by burning these items or removing them as trash. The review team found no evidence that the district followed a formal disposal procedure or documented the disposal of these items. Staff also could not identify whether or when the district had sold surplus items at auction.

Without formal, documented procedures for asset disposal, the district may not have the information necessary to maintain a complete and accurate list of assets. Additionally, Bloomington ISD is at risk of not complying with state and federal guidelines, because the district does not identify or differentiate assets purchased with federal funding. During interviews, most district staff and department heads reported being unaware of procedures for removing assets purchased with federal funding from inventory. Identifying any assets purchased with federal funding is a requirement of most grant awards that follow federal Education Department General Administrative Regulations. TEA has developed specific requirements for the disposal of these types of assets in FASRG, which states that a school district's purchasing manual should address disposal of obsolete and surplus property.

Effective districts document the asset disposal process through forms that require staff to list the asset, explain the reason for disposal (e.g., obsolete, unrepairable, lost, stolen), and the method of disposal (e.g., sale, recycled, donated). Some school districts require prior approval before disposing an asset. If a district sells an item, the procedures also stipulate where to deposit the proceeds of the sale. Procedures often require documentation of lost or stolen items. Some disposal policies stipulate that all property purchased with district funds are the property of the district, and staff must follow district guidelines to dispose of it. This statement notifies staff that assets not currently in use may not be thrown away, taken home, or donated without documenting the transaction.

To recoup some of the money invested in their assets, many districts use online auctions, physical auctions, and other means to sell surplus assets. In other cases, a school district may identify another district or nonprofit organization that needs the surplus items and is eligible to accept donations of school district property.

Bloomington ISD should develop procedures to dispose of surplus assets.

The business manager should perform the following tasks:

- include in the Business Office procedures manual the procedures for disposing of assets, including assets

purchased with federal funding. These procedures should follow Education Department General Administrative Regulations where applicable;

- explore the various disposal options and select any that best meet the district's needs; and
- establish a plan and schedule for the movement and temporary storage of surplus items pending the sale, auction, or disposal of those items.

The sale of surplus property could generate additional revenues for the district, but the actual amount cannot be estimated at this time.

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.

PROCEDURES MANUAL

Bloomington ISD has board policies that govern the district's business operations, and the Business Office page on the district website includes several instructional guides, which the business manager is using as the basis for a procedures manual. However, the district does not have comprehensive, written procedures to guide Business Office staff and other district staff in following policies while performing their daily jobs. Business operations consist of many functions, which include purchasing, payroll, accounts payable, budgeting, and general accounting. When procedures are not written, responsibilities are not well-documented, and the district's ability to manage staff is hampered. Procedures aligned with job descriptions and personnel evaluations form the basis for holding employees accountable for their responsibilities.

In addition, written procedures are essential for managing emergencies, unforeseen absences, transitions between staff, and succession planning. Without written procedures, it is more difficult for the district to ensure that Business Office processes could continue uninterrupted when performed by substitute or new staff. Written procedures also form the basis for managing process improvements. When a process or procedure changes, written revisions help communicate the change to staff and facilitate training to support the change. The business manager and other key stakeholders should develop administrative procedures regarding all

Business Office duties for use by district staff and should review and revise them periodically or whenever significant changes occur.

GRANT PLANNING

As with budget planning, the district does not connect grant applications to district goals or involve principals and department heads in planning for the expenditure of federal funds. Grant applications require the district to document how it plans to use grant funds, but the business manager does not gather input from principals during the planning and goal-setting process for the grant applications. As a result, principals are not properly informed of the amount of the district's grant awards and the requirements for use of grant funds. In addition, the district does not develop a spending plan for grants and has no formal process for monitoring the expenditure of grant funds throughout the year. The lack of principal involvement in grant planning and the lack of a spending plan may impede the district from maximizing the use of federal funds.

PURCHASING CARDS USER AGREEMENT

The district does not require staff to sign a purchasing card user agreement. Bloomington ISD permits district and campus staff to purchase goods and services using district-owned credit cards. In response to the previous CFO's lack of documentation for district purchase cards, the Business Office developed procedures for the use of these cards. All purchasing cards are held in the Business Office vault. To use the cards, staff must prepare and receive approval for a purchase order. Staff present the approved purchase order to Business Office staff and borrow a purchasing card for use. After using the card, staff must return the card to the Business Office with all supporting documentation. At the time of the onsite visit, the district did not have a purchasing card user agreement for staff to sign. Without a signed agreement, the district may be limited in recovering funds resulting from staff's fraudulent use of purchasing cards. Bloomington ISD should research and develop a purchasing card user agreement and require staff to read and sign the agreement before distributing district purchasing cards. The board should determine consequences for misuse of district credit cards and specify them in the user agreement.

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 the findings. However, by implementing **Recommendation 15** (disposal of assets), Bloomington ISD could generate an indeterminate amount of additional revenues for the district through the sale of surplus property.

4. HUMAN RESOURCES MANAGEMENT

FINDINGS

- ◆ Bloomington ISD’s human resources function lacks consistent and coordinated implementation and evaluation.
- ◆ Bloomington ISD lacks a process to evaluate the effectiveness and efficiency of its human resources activities.
- ◆ Bloomington ISD does not secure personnel files effectively.
- ◆ Bloomington ISD lacks a process to assess the district’s compensation plan effectively.
- ◆ Bloomington ISD lacks a comprehensive plan to recruit and retain qualified teachers.
- ◆ Bloomington ISD has an ineffective performance evaluation system for noninstructional staff and does not evaluate these staff consistently.

RECOMMENDATIONS

- ◆ **Recommendation 16: Add dedicated human resources staff and define, document, and communicate all human resources roles and responsibilities for staff with human resources duties.**
- ◆ **Recommendation 17: Develop annual goals for each human resources activity and establish performance measures to evaluate the effectiveness of the human resources function overall.**
- ◆ **Recommendation 18: Store all personnel files in locking, fire-rated, and waterproof cabinets housed in a secure room.**
- ◆ **Recommendation 19: Initiate a formal classification and compensation study and establish procedures to conduct updated studies regularly.**
- ◆ **Recommendation 20: Establish a comprehensive recruitment and retention plan that explores sustainable, innovative options and incentives for recruitment and retention of qualified teachers.**

- ◆ **Recommendation 21: Develop written procedures to manage the district’s performance evaluation program in accordance with board policy for noninstructional positions.**

BACKGROUND

Human resources (HR) management includes compensation, recruitment, hiring and retention, records management, staff relations and grievance processes, and staff performance evaluations. These activities are defined either by 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.

Bloomington Independent School District (ISD) does not have an HR department and does not have positions dedicated solely to carrying out HR responsibilities. These responsibilities are assigned to various positions throughout the district. Primarily, the district’s HR activities are carried out by the superintendent, the superintendent’s secretary, the payroll specialist, and the business manager. District and campus staff that have HR roles and responsibilities perform the following activities:

- post and update position vacancies;
- conduct background checks of applicants;
- process new staff and staff terminations;
- facilitate benefits managed by a third-party administrator;
- monitor the licensure status for all certified staff;
- maintain staff personnel files; and
- develop personnel policies and accompanying procedures for implementation and distribution.

During school year 2020–21, Bloomington ISD employed 151.3 full-time-equivalent positions to provide services to 885 students. **Figure 4–1** shows Bloomington ISD’s

**FIGURE 4–1
BLOOMINGTON ISD AND PEER DISTRICTS’ BUDGETED PAYROLL EXPENDITURES, SCHOOL YEAR 2020–21**

| CATEGORY | BLOOMINGTON ISD | ODEM-EDROY ISD | SANTA GERTRUDIS ISD | SKIDMORE-TYNAN ISD | PEER DISTRICT AVERAGE |
|---|-----------------|----------------|---------------------|--------------------|-----------------------|
| Total expenditures | \$11,327,107 | \$14,147,753 | \$9,320,358 | \$11,321,698 | \$11,596,603 |
| Payroll expenditures | \$7,623,794 | \$8,806,290 | \$6,042,333 | \$7,926,777 | \$7,591,800 |
| Payroll as a percentage of total expenditures | 67.3% | 62.2% | 64.8% | 70.0% | 65.5% |
| Total staff FTE positions (1) | 151.3 | 157.9 | 97.1 | 130.0 | 128.3 |
| Total teacher FTE positions | 63.0 | 73.6 | 50.6 | 66.3 | 63.5 |
| Student enrollment (2) | 885 | 841 | 779 | 804 | 808 |

NOTES:

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

(2) Student enrollment shows membership counts from the Texas Academic Performance Report, school year 2020–21.

SOURCE: Texas Education Agency, Public Education Information Management System, Budgeted Financial Data, and Texas Academic Performance Report, school year 2020–21.

**FIGURE 4–2
BLOOMINGTON ISD PERCENTAGE OF STAFF TYPES COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2020–21**

| CATEGORY | BLOOMINGTON ISD | ODEM-EDROY ISD | SANTA GERTRUDIS ISD | SKIDMORE-TYNAN ISD |
|------------------------|-----------------|----------------|---------------------|--------------------|
| Teachers | 41.7% | 46.6% | 52.1% | 51.0% |
| Auxiliary staff | 27.1% | 30.2% | 26.1% | 37.4% |
| Educational aides | 20.9% | 12.2% | 10.1% | 0.3% |
| Professional support | 5.9% | 4.4% | 7.3% | 5.1% |
| Campus administration | 2.4% | 4.1% | 3.1% | 3.1% |
| Central administration | 2.0% | 2.5% | 1.3% | 3.1% |

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

budgeted payroll expenditures compared to its peer districts during school year 2020–21. Peer districts are districts similar in size and other characteristics to Bloomington ISD that are used for comparison purposes. The peer districts for Bloomington ISD are Odem-Edroy ISD, Santa Gertrudis ISD, and Skidmore-Tynan ISD.

As shown in **Figure 4–1**, payroll expenditures for all four districts ranged from approximately \$6.0 million to \$8.8 million. Bloomington ISD’s payroll accounted for 67.3 percent of its total expenditures, which is the second highest among peer districts.

Figure 4–2 shows the distribution of staff in six categories for Bloomington ISD compared to those of its peer districts.

As shown in **Figure 4–2**, Bloomington ISD employed the largest percentage of educational aides and the second smallest percentage of central administrators.

Figure 4–3 shows the student-to-teacher ratios and student-to-staff ratios for Bloomington ISD, its peer districts, the

**FIGURE 4–3
BLOOMINGTON ISD STUDENT-TO-TEACHER AND STUDENT-TO-STAFF RATIOS COMPARED TO PEERS, REGION, AND STATE, SCHOOL YEAR 2020–21**

| DISTRICT/AREA | STUDENT-TO-TEACHER RATIO | STUDENT-TO-STAFF RATIO |
|------------------------|--------------------------|------------------------|
| Bloomington ISD | 14.0 | 5.8 |
| Odem-Edroy ISD | 11.4 | 5.3 |
| Santa Gertrudis ISD | 15.4 | 8.0 |
| Skidmore-Tynan ISD | 12.1 | 6.2 |
| Region 3 (1) | 13.1 | 6.2 |
| State | 14.5 | 7.2 |

NOTE: (1) Region 3=Regional Education Service Center III.

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

average of all districts served by regional Education Service Center III (Region 3), and the state average.

Bloomington ISD has a student-to-teacher ratio of 14.0 to 1.0, which is second highest among its peers and greater

FIGURE 4–4
BLOOMINGTON ISD’S HUMAN RESOURCES ACTIVITIES BY POSITION
SCHOOL YEAR 2021–22

| HUMAN RESOURCES ACTIVITY | POSITION RESPONSIBLE |
|---|--|
| Recruiting new employees | Superintendent’s secretary and business manager |
| Maintaining posted vacancy lists and operating an application process and tracking system | Superintendent’s secretary, student-and-community-engagement director, and campus principals |
| Overseeing the interviewing and selection of new employees | Campus principals and department heads |
| Establishing strategies for retention | Business manager and superintendent |
| Orientation and processing of new employees | Superintendent’s secretary and payroll specialist |
| Processing promotions and transfers | Payroll specialist |
| Directing staff exiting and resignation procedures | Business manager holds exit interviews with staff. The superintendent may participate in exit interviews. |
| Determining salaries and maintaining compensation schedules | Business manager |
| Conducting salary and compensation marketability research | Business manager and superintendent |
| Planning and forecasting staffing needs | Business manager, campus principals, and department heads |
| Maintaining complete employee records and files and ensuring their security | Superintendent’s secretary and payroll specialist |
| Directing and monitoring the employee benefits program | Payroll specialist and business manager |
| Developing and maintaining job descriptions | Campus administrators and department heads |
| Managing the employee evaluation and appraisal process | No dedicated staff. Campus administrators manage the teacher evaluations at their campuses. Principals are evaluated through the Texas Principal Evaluation and Support System. Other staff are not evaluated regularly. |
| Recording employee complaints and grievances | Superintendent |
| Developing employee policies and accompanying procedures for implementation | Superintendent develops employee policies. Superintendent’s secretary assembles the employee handbook. |
| Ensuring the district’s compliance with employee-related laws and regulations | No dedicated staff. |

SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

than the Region 3 average. However, the district’s student-to-teacher ratio is lower than the state average. Bloomington ISD also has a student-to-staff ratio that is lower than all but one of its peers and lower than both the Region 3 and state averages.

DETAILED FINDINGS

HUMAN RESOURCES ORGANIZATION (REC. 16)

Bloomington ISD’s HR function lacks consistent and coordinated implementation and evaluation.

Bloomington ISD does not have clearly defined HR responsibilities. Staff reported that the district’s current financial constraints inhibit it from hiring dedicated HR staff and establishing an HR department. HR duties are decentralized and dispersed among several staff members. The Legislative Budget Board’s School Performance Review

Team conducted onsite observations and staff interviews in the district in October 2021. At the time of the review team’s review, the superintendent, the superintendent’s secretary, the payroll specialist, and the business manager had primary responsibility for performing the district’s HR activities.

Figure 4–4 shows the position or positions assigned roles and responsibilities related to the district’s HR activities during school year 2021–22.

The three positions primarily responsible for HR activities in the district have limited training and lack HR education or experience. During interviews, staff reported that the payroll specialist and the superintendent’s secretary have attended HR training at the past three Texas Association of School Personnel Administrators summer conferences. However, the district does not have a training schedule and has not established any training goals for staff with HR responsibilities.

These staff do not have any professional HR certifications and are not members of any professional HR organizations.

Additionally, HR roles and responsibilities are implemented through institutional knowledge, and the district lacks comprehensive written procedures to guide staff in carrying out these duties. The lack of procedures is challenging for staff who do not have extensive HR experience or training to carry out their HR duties.

The district's fragmented HR functions also requires administrative staff to adopt HR duties that add to their existing workloads. For example, the business manager is responsible for several HR activities and for monitoring and overseeing staff that complete these activities. However, the business manager has extensive responsibilities overseeing the district's financial operations, which limit the manager's ability to oversee HR and to ensure that all HR duties are being carried out effectively. Similarly, the superintendent has added several HR duties to his position's responsibilities, which makes it more difficult for him to carry out daily duties effectively and efficiently.

As a result of the district's limited HR support and staff experience, some HR responsibilities are not executed effectively, and some duties are omitted. Bloomington ISD's HR activities include the following inefficiencies:

- the district does not have a formal process to update job descriptions regularly;
- many staff do not receive annual evaluations. During interviews, several department heads and principals reported that no formal evaluation process is in place for staff that are not teachers or principals, and that evaluations for most of these positions had not been conducted during the previous two school years;
- the district does not regularly evaluate employee salaries and stipends for competitiveness and consistency; and
- the district does not have a recruitment plan to attract qualified employees, nor a retention plan to reduce staff turnover.

Bloomington ISD's lack of dedicated and experienced HR staff also is problematic considering past events in the district. According to staff and Bloomington ISD Board of Trustees' (board) members interviews, the previous superintendent resigned in July 2019 while being investigated by the district for allegedly sexually harassing staff. The internal investigation

by Bloomington ISD found that the previous superintendent's conduct had produced an "intimidating, threatening, hostile, or offensive work atmosphere" for some staff.

One of the primary HR functions in any organization is helping staff feel safe, valued, and properly supported. However, the district did not assess its existing HR structure and support in response to these events, nor were changes made to HR operations.

Staff and board members stated their conviction that the work environment in the district has been remedied by the removal of the previous superintendent. Similarly, the review team's onsite observations and staff interviews provided no indication that this type of hostile environment still exists in the district. However, the district's failure to assess or modify HR operations following these events may affect staff morale and could fail to protect the district from risk if other issues occur.

Bloomington ISD should add dedicated HR staff and define, document, and communicate all HR roles and responsibilities for staff with HR duties.

Although the district has limited funds, the district's goal should be to establish an HR manager position who is responsible for overseeing the HR function by school year 2024–25. The position would oversee the HR activities of the superintendent's secretary and payroll specialist. Additionally, this position would assume the HR responsibilities currently performed by the business manager and superintendent and the HR activities that the district currently is not performing. The manager position should include the following responsibilities:

- overseeing the district's recruitment and hiring process;
- overseeing exit interviews
- developing HR procedures;
- developing the district's compensation plan and salary schedule;
- overseeing the administration of employee benefits;
- overseeing staff relations, including the processing of staff complaints and grievances, and implementing an effective districtwide staff retention program;
- assessing district staffing needs and placement;
- ensuring compliance with federal, state, and local employment laws, including those that address discrimination and equal employment opportunity;

- ensuring that all job descriptions are updated annually;
- ensuring that all district staff are evaluated annually;
- supervising personnel records management; and
- suggesting changes in district policies and procedures based on staff and organizational needs.

The HR manager position should be officed in the Business Office and report directly to the business manager. The district should ensure that the candidate hired for this position has experience in human resources in an educational setting.

For school year 2022–23, the district should implement the following steps regardless of its ability to establish an HR manager position. The business manager should identify all HR activities within the district and clearly define all roles and responsibilities related to HR. The business manager should develop an operations manual for all HR activities. The manual should contain a description of the district’s HR organization, written procedures for each responsibility performed by staff with HR duties, and any board policies that refer to HR. The business manager should review and update the manual annually. The district also should make the manual accessible to all staff.

Bloomington ISD should assess the training needs of staff with HR duties and ensure that such staff receive the training they need to carry them out effectively. The business manager should establish training goals for each staff member who has HR responsibilities. These goals may include employees obtaining certifications and attending regular trainings to improve their HR skills and knowledge. The business manager should develop a training schedule and training budget for staff with HR responsibilities and ensure that such staff join at least one professional association for additional education and assistance.

The fiscal impact assumes that the district establishes an HR manager position in school year 2024–25 and that the payroll specialist, superintendent’s secretary, and the business manager join a professional HR organization. If the district hires an HR manager, the position’s salary should be developed by considering the range of the salaries of other Bloomington ISD department heads as well as the salaries of similar HR positions in surrounding districts. The projected cost to establish this position is \$105,618 (\$88,015 x 0.20 benefits rate). This cost is estimated, and the district could use the results of the salary study shown in **Recommendation**

20 to determine an accurate fiscal impact for establishing this position. The total projected cost for current staff to join an HR organization, such as the Society for Human Resource Management (SHRM) for school years 2022–23 to 2023–24 is \$657 annually (\$219 annual professional membership fee x three staff). The projected cost for school years 2024–25 to 2026–27 is \$106,275 annually (HR manager’s salary and benefits of \$105,618 + annual professional membership for three staff of \$657). Additional costs for training will depend on the district’s assessment of staffs’ training needs.

PERFORMANCE MEASURES (REC. 17)

Bloomington ISD lacks a process to evaluate the effectiveness and efficiency of its HR activities.

Effective HR operations are an essential component of managing a successful school district. Payroll represents a significant portion of a school district’s expenditures. During school year 2020–21, employee salaries and benefits constituted 67.3 percent of Bloomington ISD’s total annual budget. A robust HR function with effective recruitment and retention practices helps ensure that the district invests in a talented, dedicated workforce.

In addition to hiring new staff, a core activity of HR is supporting current employees throughout their careers and enhancing the employment experience. HR also oversees the equitable application of district policies, procedures, and benefits while maintaining district compliance with federal and state employment laws and HR best practices.

However, the district has not established a process to evaluate its HR operations. Performance measures track progress toward achieving the organization’s objectives by monitoring activities that are key to the success or failure of these efforts. In the school year 2021–22 District Improvement Plan (DIP), the district established one goal and one key performance measure for HR. The DIP goal states that Bloomington ISD annually will recruit, develop, and retain highly effective teachers and principals and provide them with an effective system of support to carry out the district’s mission, goals, and objectives. The only performance measure for this goal is that the district will retain at least 90.0 percent of teachers who participate in its teacher mentor program. The district has established the same HR goal in each of its last three annual DIPs.

During interviews, staff reported uncertainty whether the district met this goal for HR during any of the previous three school years, nor did they report knowing how progress toward

this goal may have been assessed. No evidence shows that the district has conducted any analysis or evaluation of HR during this period. The district does not survey staff regularly regarding HR or solicit staff opinions regarding HR operations.

Performance measures can be used to continuously improve efficiency and effectiveness in routine HR operations. Similarly, obtaining regular employee feedback helps the district assess what is and is not conducive to HR operations' success. Gathering employee feedback also can improve staff morale by providing them a contributing role to improve HR operations.

In a 2010 report, the nonprofit organization American Enterprise Institute (AEI) for public policy research emphasizes the importance of HR operations in school districts, stating, "Dramatically improving the quality of teaching requires that a system be able to monitor personnel; gauge performance; and competently manage hiring, transfers, benefits, employee concerns, and termination." AEI recommends using measures for HR that provide the following information:

- the number of applicants for positions, how rapidly they are assessed, and how rapidly successful applicants are placed and prepared;
- staff satisfaction with the HR function's support and responsiveness to various concerns; and
- staff performance on various relevant metrics other than student achievement, such as soliciting performance rankings of teachers by their principals and of other employees by their managers.

In a 2018 report, Hanover Research states that common performance measures for human resources include the numbers and rates of teacher retention and separation, the percentage of teachers with effective ratings, hiring timelines, vacancies, and employee satisfaction with the HR department. Additionally, the Council of the Great City Schools identifies performance measures for HR, including the cost of employee benefits, HR costs per district per full time equivalent, and teacher retention rates.

Bloomington ISD should develop annual goals for each HR activity and establish performance measures to evaluate the effectiveness of the HR function overall.

The superintendent and business manager should develop annual HR goals and performance measures. One resource the district should use in determining HR goals and

performance measures is an annual survey of district employees to determine employee satisfaction with the various HR services. The district should review the examples of performance measures identified by AEI, Hanover Research, the Council of the Great City Schools, and SHRM. The district should review the following examples of HR performance measures:

- percentage of new teachers;
- retention rates of teachers by years of service;
- teacher vacancies unfilled on the first instructional day for students;
- noncertified teachers as a percentage of total teachers;
- substitute placement rate;
- substitute costs per year, by campus, including dollar amount and percentage of salaries and wages;
- average days from recommendation by hiring manager to start date;
- staff separation rate by position (teachers, principals, auxiliary staff, etc.);
- health benefits cost per enrolled employee;
- benefits cost as a percentage of total salaries and wages;
- HR cost per district full-time-equivalent position
- rate of noninstructional employees receiving an annual evaluation; and
- exit interview completion rate.

The district should select several of these performance measures and establish goals for each measure. The superintendent and the business manager should meet quarterly to assess HR goals and performance measures. The superintendent also should provide the board with quarterly updates on HR goals.

The district could implement this recommendation with existing resources.

PERSONNEL FILES (REC. 18)

Bloomington ISD does not secure personnel files effectively.

The district's personnel files are paper-based and housed in filing cabinets in the administrative building, a mobile building located next to Placedo Elementary School. The administrative building houses the Business Office, which includes the payroll

specialist, the superintendent's secretary, the accounts payable and Public Education Information Management System coordinator, and the business manager. The files are kept in a room adjoined to the payroll specialist's office.

The room housing the personnel files has one entry point, which is accessible only by walking through the workspace of both the superintendent's secretary and the payroll specialist. However, neither the door to this room nor the filing cabinets that hold the personnel files are secured. During interviews, staff reported that the room is never locked, even after hours when no staff are present. The unlocked filing cabinets that house the personnel files are neither fire-rated nor waterproof.

Bloomington ISD also does not have written procedures detailing which staff have access to the personnel files. Staff reported that the only positions that access the files are those in the Business Office. Although no evidence shows that other individuals are accessing the files, without written procedures, staff with HR duties may be uncertain who has authorized access.

Bloomington ISD Board Policy GBA (LEGAL) addresses the confidentiality of personnel records and their contents. The policy states the types of information about staff and students that are designated as confidential and not subject to disclosure pursuant to the Texas Public Information Act. Examples include Social Security numbers and teacher and administrator evaluations. Bloomington ISD does not have any additional local policies or written HR procedures to physically ensure the safety, security, and storage of these files and to protect their confidentiality.

The district's personnel files contain confidential employee information as referenced in Board Policy GBA (LEGAL), including the following information:

- employee contracts;
- performance evaluations;
- direct deposit slips; and
- personal identification data and emergency contact information.

Maintaining unsecured personnel files places both the district and employees at risk for unauthorized access to or acquisition of confidential employee information. If the district is not maintaining confidential employee information effectively, it could be in violation of board policy and statute, which could make Bloomington ISD vulnerable to legal or civil actions.

No federal regulations or state statutes govern the manner and security of how HR personnel files are stored. However, industry best practices can guide districts that maintain paper-based personnel files. For example, SHRM recommends that paper-based personnel files are kept in a secure room that remains locked unless access to the room is required. Best practices also specify that paper-based personnel files should be placed in file cabinets that are locked when not in use.

Additionally, industry standards recommend keeping paper-based personnel files in file cabinets that are both fire-rated and waterproof. This standard is especially relevant for Bloomington ISD, whose personnel files are housed in an older mobile building that may be more susceptible to weather damage than other district facilities. Bloomington ISD's property has been damaged by several weather-related incidents, including hurricanes and tropical storms. If the personnel files are damaged by fire or water, it would be difficult for Bloomington ISD to recover lost documents.

Bloomington ISD should store all personnel files in locking, fire-rated, and waterproof cabinets housed in a secure room.

The business manager should establish written procedures governing storage of and authorized staff access to personnel files. The district should communicate these procedures to staff with HR duties. The district should require that the door to the personnel file room remains locked unless it is being accessed by authorized staff. The business manager also should limit access to the personnel file room key and the filing cabinet keys to a small number of authorized staff identified in the written procedures.

The superintendent and the business manager should conduct a cost-benefit analysis of replacing paper-based personnel files with an electronic personnel files system. Maintaining electronic files mitigates some of the risk associated with paper files, which could enable the district to control access to the files more efficiently, increase efficiency, and save district office space.

If the district determines that it cannot financially switch to electronic personnel files, the district should replace the current filing cabinets with cabinets that are both fire-rated and waterproof. After the new cabinets are installed, they should remain locked unless they are being accessed. The estimated costs of purchasing these two cabinets would be approximately \$3,000 (\$1,500 per cabinet x 2).

**FIGURE 4–5
AVERAGE TEACHER SALARIES IN BLOOMINGTON ISD COMPARED TO PEERS AND REGIONAL DISTRICTS
SCHOOL YEAR 2020–21**

| EXPERIENCE | BLOOMINGTON ISD | PEER DISTRICTS | | | REGIONAL DISTRICTS | | |
|--------------------------------|-----------------|----------------|---------------------|--------------------|--------------------|----------------|--------------|
| | | ODEM-EDROY ISD | SANTA GERTRUDIS ISD | SKIDMORE-TYNAN ISD | CALHOUN COUNTY ISD | INDUSTRIAL ISD | VICTORIA ISD |
| Beginning teachers | \$42,622 | \$46,394 | \$41,562 | \$48,220 | \$40,607 | \$39,833 | \$45,818 |
| 1 to 5 years' experience | \$49,031 | \$46,464 | \$46,766 | \$45,559 | \$46,060 | \$38,812 | \$46,950 |
| 6 to 10 years' experience | \$57,830 | \$50,633 | \$50,237 | \$47,768 | \$49,203 | \$44,032 | \$49,332 |
| 11 to 20 years' experience | \$60,436 | \$54,798 | \$62,198 | \$53,192 | \$55,771 | \$53,140 | \$51,507 |
| 21 to 30 years' experience | \$75,592 | \$58,255 | \$67,904 | \$57,711 | \$62,142 | \$58,330 | \$57,001 |
| More than 30 years' experience | \$63,276 | N/A | \$72,441 | \$56,947 | \$62,243 | \$61,700 | \$59,110 |

NOTE: Salaries shown include pay for regular teaching duties and do not include stipends for additional work in the district.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school year 2020–21.

No fiscal impact is assumed for this recommendation until the district determines if it is more cost-effective and efficient to update its records to electronic files or purchase two fire-rated and waterproof file cabinets.

COMPENSATION PLAN (REC. 19)

Bloomington ISD lacks a process to assess the district’s compensation plan effectively.

The district’s compensation plan does not include salary information for all positions. The business manager and superintendent annually perform an informal study of selected salaries paid by nearby school districts. After analyzing these informal comparisons, they may adjust salaries at Bloomington ISD.

Bloomington ISD does not conduct regular classification and compensation studies, which are intended to examine the responsibilities, salary, and work performed by various positions. School districts use the data gathered in these studies to develop new job descriptions, classify positions according to a uniform standard, survey the market of comparable communities to determine representative rates of compensation, and develop and recommend a pay plan. During interviews, staff could not identify the last time Bloomington ISD had conducted such a study.

An examination of the district’s compensation plan shows several potential concerns regarding salaries and stipends.

The Texas Administrative Code, Title 19, Part 2, Chapter 153, Subchapter CC, Section 153.1021, establishes a minimum salary-step compensation structure for teachers based on years of creditable teaching service. School districts adapt this scale to develop specific compensation plans for teachers. The compensation structure enables teachers to progress up the plan’s steps as they gain annual experience. School districts often award an annual step-pay increase to teachers when they have completed a year of creditable experience. If the budget enables it, districts often add extra compensation to the step increase.

Bloomington ISD has established a salary-step scale for teachers that meets the requirements in the Texas Administrative Code, in which staff pay increases at each step in the scale. However, the steps in the Bloomington ISD pay scale do not necessarily equal years of service. Teachers progress on the scale when administrators determine they merit pay increases.

Figure 4–5 shows Bloomington ISD’s average teacher salary compared to its peer districts and selected bordering districts.

As shown in **Figure 4–5**, average teacher salaries at Bloomington ISD are competitive with the pay offered in surrounding and peer districts. In several categories, the average teacher salaries for Bloomington ISD are significantly higher than at any of the comparable districts. Bloomington ISD’s average salaries are greater than in the next closest district for teachers with six to 10 years’

FIGURE 4–6
BLOOMINGTON ISD DIRECTORS PAY SCALE
SCHOOL YEAR 2021–22

| STEP | ATHLETIC DIRECTOR | FOOD SERVICE DIRECTOR | MAINTENANCE DIRECTOR | TECHNOLOGY DIRECTOR | TRANSPORTATION DIRECTOR |
|------|-------------------|-----------------------|----------------------|---------------------|-------------------------|
| 0 | \$67,000 | \$57,000 | \$70,000 | \$59,000 | \$50,000 |
| 1 | \$69,000 | \$58,000 | \$71,000 | \$60,000 | \$51,000 |
| 2 | \$71,000 | \$59,000 | \$72,000 | \$61,000 | \$52,000 |
| 3 | \$73,000 | \$60,000 | \$73,000 | \$62,000 | \$53,000 |
| 4 | \$75,000 | \$61,000 | \$74,000 | \$63,000 | \$54,000 |
| 5 | \$77,000 | \$62,000 | \$75,000 | \$64,000 | \$55,000 |

SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD Employee Compensation Guide, school year 2021–22.

experience by \$7,197 and for teachers with 21 to 30 years' experience by \$7,688.

When examining the pay scales at Bloomington ISD compared to these other districts, it is not clear why average salaries show discrepancies. For example, the district could not explain why teachers at Bloomington ISD that have 21 to 30 years' experience average \$12,316 more in annual salary than teachers who have more than 30 years' experience.

During interviews, staff reported no awareness of these anomalies, nor why they were occurring. The lack of a regular compensation and classification process makes it difficult to determine whether the district has legitimate reasons for these anomalies or whether they are evidence of inequity or inefficiencies in teacher pay.

The district's compensation plan for nonteaching staff also shows irregularities. The salaries for these positions are listed as step scales. During interviews, staff reported uncertainty regarding how nonteaching salary scales had been developed before the tenures of the current business manager and superintendent.

An example of compensation irregularities appears in the salary scale labeled Administrative/Professional Salary Schedule in the district's school year 2020–21 Employee Compensation Guide. The scale shows five director positions for the functions of athletics, food service, maintenance, technology, and transportation. **Figure 4–6** shows the pay scale for Bloomington ISD's five director positions.

The salaries for these five positions vary greatly. For example, the maintenance director is paid more at each stage of the pay scale than the food service, technology, and transportation directors. The maintenance director earns

\$70,000 at the first step of the scale, compared to the food service director and transportation director, who earn \$57,000 and \$50,000, respectively, at the same step. Additionally, the athletic director receives a \$2,000 increase at each pay scale step while all other directors receive \$1,000 per step. These salaries are not based on standard metrics such as job qualifications, specialized skills, job duties, or supervisory responsibilities. Neighboring Victoria ISD pays the directors of food service, transportation, and maintenance according to a single salary structure.

The compensation plan for nonteaching staff also includes pay for an assistant superintendent position that no longer exists in the district and excludes positions that do exist, such as the student-and-community-engagement director and the district nurse. These omissions show that the district's review of this plan for school year 2021–22 was limited.

Bloomington ISD's compensation plan also includes supplemental duty stipends for staff who assume extra athletic or academic duties. An examination of how the district awards stipends raises some issues. For example, the annual stipend paid to the football team's defensive coordinator is \$5,000. This amount is \$2,000 more than the stipend paid to the head coaches of baseball, softball, volleyball, and boys' and girls' basketball. This amount also is more than any academic stipend and equal to the stipend received by the special education coordinator and district testing coordinator. Additionally, the compensation plan has a section of stipends labeled Department Leaders, Coordinators, and Sponsors. In this section, the yearbook sponsor for grades six to 12 receives an \$800 stipend, and the district's disabilities accommodations (Section 504) coordinator and the spirit club sponsor for grades six to 12 each receive \$500.

During interviews, Bloomington ISD staff reported uncertainty regarding how the stipend amounts had been determined. Without an analysis of the time invested and the qualifications necessary to carry out these duties, the district may not have evidence to support the varying stipend amounts, which may raise questions about pay equity and transparency among staff and the community.

Bloomington ISD should initiate a formal classification and compensation study and establish procedures to conduct updated studies regularly.

The Texas Association of School Boards (TASB) provides customized consulting services to school districts. When TASB consultants complete a school district compensation study, the organization provides districts with procedural guidelines that they can choose to implement. These guidelines help districts customize their compensation practices to meet their changing needs. For example, TASB consultants provide formulas and procedures for the following areas:

- determining actions to reclassify jobs;
- determining pay for temporary assignments;
- providing for general pay increases based on the midpoint for each pay grade; and
- providing detailed information for managing employee progression through each of the pay grades as employees receive promotions or other changes in pay.

To ensure that classifications remain aligned, the formal classification study should be performed at least once every five years.

The fiscal impact assumes a onetime cost of \$35,000 for a formal compensation and classification study conducted by an external consulting service. This cost is determined by the district's student enrollment and number of staff.

RECRUITMENT AND RETENTION (REC. 20)

Bloomington ISD lacks a comprehensive plan to recruit and retain qualified teachers.

During onsite interviews, staff said that recruiting highly qualified staff effectively is one of the central problems of the district. The issue also appears prominently in the district's school year 2020–21 DIP, which identifies recruiting,

assigning, and retaining a full highly effective staff as one of Bloomington ISD's primary challenges.

The DIP includes several strategies that the district is taking to improve teacher recruitment, including the following activities:

- advertise job openings in the local media, on Bloomington ISD's website, and through listings at the Business Office;
- participate in recruitment fairs at Region 3 and state universities;
- maintain communication with Alternative Teacher Certification Programs;
- provide professional development activities and other financial support to teachers who serve English learners, including stipends and other expenses related to certification test preparation and funds to attend educational conferences and symposiums;
- implement the district's teacher mentoring program to provide multiyear professional support; and
- provide ongoing and targeted professional development based on identified needs.

Although Bloomington ISD included these strategies in its DIP, the district's implementation of its recruitment process is fragmented and not communicated effectively to all staff. No staff position oversees or guides the district's recruitment process. For example, the responsibility for posting job openings often is divided between the superintendent's secretary, who posts openings in local newspapers and on billboards, and the student-and-community-engagement director, who posts openings on the district website and on social media.

When discussing the recruitment strategies described in the DIP, district staff were unable to communicate which of these strategies were carried out during school year 2020–21. For example, when discussing teacher mentoring programs at their campuses, principals reported that teachers often assist each other, but no formal mentoring programs are in place at any campus.

Some staff reported being unaware of the recruitment strategies included in the DIP, and all staff who were interviewed said that the district does not have a coordinated recruitment plan. While discussing the district's recruitment strategies, most staff reported being aware of job openings

FIGURE 4–7
BLOOMINGTON ISD TEACHERS' YEARS OF EXPERIENCE AND TURNOVER RATES COMPARED TO PEER DISTRICTS AND REGIONAL AND STATE AVERAGES
SCHOOL YEAR 2020–21

| TEACHERS | BLOOMINGTON ISD | ODEM-EDROY ISD | SANTA GERTRUDIS ISD | SKIDMORE-TYNAN ISD | REGION 3 (1) | STATE |
|---|--------------------|-------------------|------------------------|-----------------------|--------------|-------|
| Beginning teachers (less than 1 year's experience) | 4.6% | 12.2% | 4.0% | 13.5% | 6.7% | 6.7% |
| 1 to 5 years' experience | 41.3% | 29.9% | 23.7% | 21.1% | 24.6% | 27.8% |
| 6 to 10 years' experience | 20.6% | 8.2% | 13.6% | 16.6% | 18.9% | 20.3% |
| 11 to 20 years' experience | 23.0% | 36.0% | 35.0% | 24.1% | 27.6% | 29.1% |
| More than 20 years' experience | 10.6% | 13.7% | 23.7% | 24.7% | 22.2% | 16.1% |
| Average years of experience | 8.9 | 10.6 | 13.7 | 12.0 | 12.6 | 11.2 |
| Average years of experience with district | 3.1 | 6.1 | 6.2 | 6.5 | 7.8 | 7.2 |
| Teacher turnover rate | 29.3% | 15.2% | 17.8% | 14.0% | 16.7% | 14.3% |

NOTES:
(1) Region 3=Regional Education Service Center III.
(2) Totals may not sum due to rounding.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school year 2020–21.

posted to the district website and social media and of staff attendance at recruitment fairs. However, staff could not identify who was responsible for attending recruitment fairs or if the district had a schedule of events to attend.

Bloomington ISD also lacks a process to retain existing staff effectively. **Figure 4–7** shows teachers' years of experience and turnover rates at Bloomington ISD compared to peer districts, districts served by Region 3, and the state averages.

Bloomington ISD's teacher turnover rate for school year 2020–21 was 29.3 percent, which is significantly higher than turnover rates from any of the peer districts, Region 3, or the state. Bloomington ISD also has the lowest percentages of teachers that have been teaching for 11 years or more. The district's teacher turnover rate during school year 2020–21 is not a one-year anomaly that may have been inflated by disruptions due to the COVID-19 pandemic. The teacher turnover rate decreased during school year 2020–21, from 34.5 percent during school year 2019–20 and 33.3 percent during school year 2018–19.

During onsite interviews, staff reported several obstacles to retaining educators, including low pay and lack of a teacher mentoring program. Low pay was reported by staff even though **Figure 4–5** shows that the district average pay for teachers is above their peers in most

categories. Despite awareness of these challenges, the district has implemented few incentives for teachers to remain with Bloomington ISD. Although the district awards stipends to teachers when their students perform well on state assessments, survey results indicate that this incentive is insufficient. In a survey conducted by the review team, 38.0 percent of campus staff agreed with the statement, "Employees are rewarded for superior performance." In addition to a lack of incentives, the district does not use data adequately to analyze the reasons for teacher turnover. For example, the district does not conduct employee satisfaction surveys or gather feedback from staff regarding why they feel the district is struggling to retain teachers. Although Bloomington ISD conducts exit interviews with staff leaving the district's employment; however, the process is informal, and the district does not collect or analyze information gathered during these interviews effectively.

Without the implementation of a focused and clearly defined recruitment and retention plan, Bloomington ISD may continue to record a high rate of teacher turnover. High rates of teacher turnover are an expense for the district, because turnover disrupts campus operations and affects students' academic performance. Bloomington ISD's high rate of turnover may have contributed to its recent poor academic accountability ratings.

Bloomington ISD should establish a comprehensive recruitment and retention plan that explores sustainable, innovative options and incentives for recruitment and retention of qualified teachers.

To facilitate the development of the recruitment and retention plan, the district should establish a districtwide advisory committee focused specifically on these areas. The advisory committee should involve representatives from all key stakeholders—including administrators and teachers, experienced and new—and include a diverse group of new and tenured staff.

The superintendent should assign one staff position to oversee the district's recruitment and retention processes. This staff should lead the advisory committee to develop and implement a recruitment and retention plan. In developing the plan, the district should conduct a survey of staff to assess their job satisfaction and ways to improve staff recruitment and retention. This plan should set goals for recruitment and retention and outline strategies to achieve these goals. The plan should specify who is responsible for each strategy and any resources necessary for its implementation. The completed plan should be communicated to all campus administrators and department heads. The committee should consider including the following strategies:

- require job openings to be advertised at various university and college career centers;
- develop an activity calendar, finalized annually in January or early February, to identify dates of recruitment fairs and staff that will attend. The district should consider requiring campus principals to attend recruitment fairs and conduct initial interviews with potential candidates;
- develop recruitment packets to distribute at events that clearly describe the district's salary, benefits package, and incentive programs;
- schedule interview dates with prospective teachers from early spring until mid-summer so that campus administrators can attend while applicant pools are at their peak;
- establish a teacher mentoring program that is administered across all campuses consistently. The mentoring program should target first-year teachers and experienced teachers who are new to Bloomington ISD. The district should evaluate the mentoring program annually and modify it as needed;

- develop a standard set of exit interview questions and a method for analyzing responses to the questions annually; and
- investigate the Texas Education Agency (TEA) Grow Your Own Program and apply for available grants. The Grow Your Own Program focuses on the recruitment of future educators by offering education and training courses with potential dual-credit opportunities to current high school students within the district while also transitioning paraeducators to teaching roles and supporting teacher residency models. Grant recipients receive funds to start or expand education and training courses and associated Career and Technical Student Organizations at the high schools and strengthen these programs with the resources and support of TEA's grant technical assistance network.

The advisory committee should meet annually to make recommendations to the superintendent regarding incentives to increase staff retention and ways to improve staff recruiting.

The district could implement this recommendation with existing resources.

NONINSTRUCTIONAL EVALUATIONS (REC. 21)

Bloomington ISD has an ineffective performance evaluation system for noninstructional staff and does not evaluate these staff consistently.

Bloomington ISD Board Policy DN (LOCAL) requires that all district staff must receive at least one evaluative conference annually. The policy also states that evaluation and appraisal ratings are based on the evaluation instrument and cumulative performance data that supervisors may compile throughout the year. Additionally, policy requires that all staff receive copies of their annual printed evaluations.

The district uses TEA's Texas Teacher Evaluation and Support System and Texas Principal Evaluation and Support System to evaluate all district teachers and campus principals annually. However, the district does not comply with board policy for noninstructional staff (i.e., employees other than teachers and principals). For example, no evidence shows that the district uses standard evaluation tools or established evaluation expectations to appraise the performance of operational department staff. The maintenance director, the transportation director, and the food service director reported that they had not been evaluated formally during school years 2019–20 or 2020–21. The staff these positions supervise also are not receiving formal annual evaluations.

These staff include custodians, maintenance staff, food service staff, and transportation staff. During interviews, the department heads reported using an informal feedback method of evaluation for the staff they supervise.

The type and frequency of evaluations for noninstructional campus staff also is not consistent. Campus principals reported that they do not have formal evaluation tools or processes for noninstructional staff such as counselors, librarians, and secretaries. Some principals establish their own evaluation rubrics for various positions, and others implement informal discussions that serve as staff evaluations.

Effective school districts use annual job performance evaluations to measure how well employees are performing their job responsibilities and evaluate other workplace behaviors that the district considers important. In addition, without a regular review of their job performance, staff are not provided the opportunity to receive input from their supervisors and improve their performance.

If a school district fails to perform evaluations, staff could assume that substandard job performance is acceptable. The district could have difficulty dismissing staff for unsatisfactory performance if that individual has never been informed of the issue. Often, this scenario raises allegations of disparate treatment or leads to employee grievances or lawsuits. When supervisors evaluate employees through informal verbal conversations, no written documentation supports compensation considerations, promotion or demotion actions, or termination decisions. If an employee subsequently files a disparate treatment claim with the U.S. Equal Employment Opportunity Commission, the district may find it difficult to defend itself without written evidence of job performance history.

Bloomington ISD should develop written procedures to manage the district's performance evaluation program in accordance with board policy for noninstructional positions.

The superintendent and business manager should develop procedures for Bloomington ISD's annual appraisal process for noninstructional staff. The superintendent, with assistance from department heads, should develop a standard evaluation tool for noninstructional staff aligned to the requirements of Board Policy DN (LOCAL). Department heads should develop evaluation tools for the positions they supervise. The business manager should establish a schedule

that specifies evaluation dates to ensure annual evaluations of all noninstructional positions.

After the district develops written procedures with established evaluation deadlines for each staff category, the business manager and superintendent should provide training to the principals and other departmental supervisors about the requirements. The business manager also should establish a review schedule to annually update evaluations and request feedback from supervisors regarding necessary updates to evaluation instruments.

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.

JOB DESCRIPTIONS

Bloomington ISD reviews job descriptions as positions open or other needs arise. During interviews, staff reported that the district lacks a process for ensuring that job descriptions match the duties of each position. The district bases its job descriptions on templates developed by TASB. However, these templates are model job descriptions that are intended to be updated and modified to fit the district that uses them. In a smaller district, such as Bloomington ISD, individuals often perform extra duties that surpass language in the standard job description for their positions. For example, the job descriptions for business manager, payroll specialist, and the superintendent's secretary do not include all the HR activities these positions are expected to perform. Bloomington ISD does not have a process to review job descriptions to ensure they match the actual duties of staff, and job descriptions are not updated regularly. Without a written list of specific job responsibilities and work expectations, Bloomington ISD staff may lack a clear and concise resource to guide their job performance. The district should review and update all district job descriptions annually to align job titles with the responsibilities staff perform.

STAFF RESIDENCES

Bloomington ISD owns and maintains two staff residences: a modular house near Placedo Elementary School

designated as housing for the superintendent, and a house adjacent to the middle school and high school campuses occupied by the behavior coordinator at the time of the review team’s onsite visit.

Since its purchase by the district in April 2015, the superintendent’s house has been included in the compensation package offered to district superintendents. The district does not receive rent or utility payments from the staff occupying district-owned residences, and district maintenance staff reported that they provide maintenance services and supplies for both district-owned residences.

District staff did not provide a residential agreement for either of the staff residences to the review team, and Business Office staff indicated that they had not received these agreements, nor had an opportunity to review or evaluate them. The lack of a residential agreement potentially places both the district and the resident at financial risk if damages occur to the property or repairs are needed for the residence. Additionally, not having residential agreements available and housed in the Business Office results in a lack of financial transparency and accountability.

The district should ensure that staff residences are a transparent benefit of employment described in the relevant employment contracts, that requirements for potential staff occupants are communicated clearly to all relevant stakeholders, and that residential agreements are available to Business Office staff and reviewed regularly prior to renewal. The district also should evaluate the maintenance costs associated with upkeep of these properties and determine whether to continue with current arrangements for staff residences.

PERSONNEL FILE ORGANIZATION

Bloomington ISD began the process of organizing personnel files during summer 2021. Staff began relabeling files to ensure they contained necessary information according to a checklist. During onsite interviews, staff said that this process has not been completed, and they were not certain from where the checklist originated. The district should complete the process of organizing personnel files using a personnel files checklist developed by TASB as a guide to ensure that all files contain the necessary information.

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 School Performance Review Team could not determine a fiscal impact for other recommendations. The implementation of **Recommendation 16** will require additional costs to the district if adding an HR manager position; however, the total fiscal impact of adding this position could not be determined. Additionally, if the district decides to not digitize personnel records stated in **Recommendation 18**, it could incur a cost of \$3,000 to replace existing filing cabinets.

| RECOMMENDATIONS | 2022–23 | 2023–24 | 2024–25 | 2025–26 | 2026–27 | TOTAL 5-YEAR (COSTS) OR SAVINGS | ONETIME (COSTS) OR SAVINGS |
|--|----------------|----------------|--------------------|--------------------|--------------------|---------------------------------|----------------------------|
| 4. HUMAN RESOURCES MANAGEMENT | | | | | | | |
| 16. Add dedicated HR staff and define, document, and communicate all HR roles and responsibilities for staff with HR duties. | (\$657) | (\$657) | (\$106,275) | (\$106,275) | (\$106,275) | (\$320,139) | \$0 |
| 19. Initiate a formal classification and compensation study and establish procedures to conduct updated studies regularly. | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | (\$35,000) |
| Total | (\$657) | (\$657) | (\$106,275) | (\$106,275) | (\$106,275) | (\$320,139) | (\$35,000) |

5. TRANSPORTATION MANAGEMENT

FINDINGS

- ◆ Bloomington ISD’s Transportation Department lacks written standard operating procedures to ensure safe and effective transportation service delivery.
- ◆ Bloomington ISD relies on manual, paper-based processes for transportation operations and record keeping.
- ◆ Bloomington ISD’s Transportation Department lacks performance metrics to guide the management of the department and assess its effectiveness and efficiency.
- ◆ Bloomington ISD lacks a comprehensive, board-adopted, bus-replacement policy.

RECOMMENDATIONS

- ◆ **Recommendation 22: Develop written standard operating and safety procedures, including safety protocols, for transportation staff functions.**
- ◆ **Recommendation 23: Utilize transportation technology effectively to minimize administration, enable analytics, and improve effectiveness and efficiency of operations.**
- ◆ **Recommendation 24: Develop performance metrics to measure the effectiveness and efficiency of the Transportation Department.**
- ◆ **Recommendation 25: Develop a board policy to guide bus and white-fleet-vehicle replacement and disposal based on the vehicle’s mileage and age.**

BACKGROUND

An independent school district’s transportation function transports students to and from school and other school-related activities. This function is regulated by state and federal 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 contractor to supervise its transportation operation. In this arrangement, a district may rely on the company to provide all or some staff, or the district may use its own staff to conduct its operations. Using the self-management model, a district manages transportation functions without assistance from an outside entity. Bloomington Independent School District (ISD) self-manages its transportation function.

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. State transportation funding relies on a district’s annual submission of certain transportation reports to the Texas Education Agency (TEA), which is determined by a formula that includes the number and type of students transported.

Bloomington ISD’s Transportation Department maps and serves the bus routes that transport students to and from school each day, and coordinates transportation for athletics and extracurricular trips. The Transportation Department also is responsible for making recommendations to the superintendent on district purchases of school buses and general service vehicles.

The district maintains a fleet of 14 school buses that serve 11 regular bus routes, which include 10 regular education routes and one special-services route. During school year 2020–21, the district reported to TEA transporting an average of 358 students daily out of 885 enrolled, or 40.5 percent.

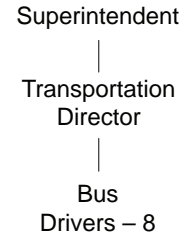
Bloomington ISD’s Transportation Department is overseen by the transportation director, who was hired in August 2021 and reports to the superintendent. **Figure 5–1** shows the school year 2021–22 organization of Bloomington ISD’s Transportation Department. The district has eight route drivers and one substitute driver. All transportation staff are officed at the fleet maintenance facility. The district’s bus storage and fleet maintenance facility is adjacent to Bloomington High School. Department staff perform general maintenance such as oil and tire changes on district-owned vehicles. The district does not have a mechanic on staff and outsources all bus repairs to a company in nearby Victoria. The fleet maintenance facility has a fuel point that dispenses diesel fuel and unleaded gasoline.

Figure 5–2 shows the district’s student ridership during the past three years. The average daily ridership decreased in school year 2020–21 by 217 students from school year 2018–19. The loss was attributed to lower ridership numbers as many students received remote instruction in school year 2020–21.

Figure 5–2 also shows the linear density and the total annual state funding for transportation. Linear density is the ratio of the average number of regular education students transported daily to the number of miles traveled daily for those students. From school years 2018–19 to 2020–21, total annual state funding has decreased by \$28,944.

A key indicator of a transportation operation’s efficiency is a comparison of the operation’s fleet and costs against similar-sized operations. Figure 5–3 shows the operations cost, number of buses, ridership, and cost per regular program and special program per mile for Bloomington ISD and its peer districts during school year 2020–21. Peer districts are school districts similar in size and other characteristics to Bloomington ISD that are used for comparison purposes. The peer districts for Bloomington ISD are Odem-Edroy ISD, Santa Gertrudis ISD, and Skidmore-Tynan ISD. No transportation data is available from TEA for Santa Gertrudis ISD for the past three school years. For school year 2020–21,

**FIGURE 5–1
BLOOMINGTON ISD’S TRANSPORTATION DEPARTMENT ORGANIZATION
SCHOOL YEAR 2021–22**



SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

Bloomington ISD had lower operations costs and lower regular program mile costs and special program mile costs than the two peer districts that reported information to TEA.

DETAILED FINDINGS

STANDARD OPERATING PROCEDURES (REC. 22)

Bloomington ISD’s Transportation Department lacks written standard operating procedures to ensure safe and effective transportation service delivery.

**FIGURE 5–2
BLOOMINGTON ISD’S TRANSPORTATION ROUTING AND STATE FUNDING DATA
SCHOOL YEARS 2018–19 TO 2020–21**

| CATEGORY | 2018–19 | 2019–20 | 2020–21 |
|--|-----------------|-----------------|-----------------|
| Average daily ridership – Regular program/Hazardous area service | 566 | 605 | 344 |
| Average daily ridership – Special program | 9 | 25 | 14 |
| Average daily ridership – Total students | 575 | 630 | 358 |
| Linear density | 1.29 | 1.41 | 1.87 |
| Total annual state funding | \$94,326 | \$71,277 | \$65,382 |

SOURCE: Texas Education Agency, Bloomington ISD School Transportation Route Services Report, school years 2018–19 to 2020–21.

**FIGURE 5–3
BLOOMINGTON ISD AND PEER DISTRICTS’ VEHICLE FLEET COMPARISON
SCHOOL YEAR 2020–21**

| DISTRICT (1) | OPERATIONS COST | BUSES | RIDERS | COST PER REGULAR PROGRAM MILE | COST PER SPECIAL PROGRAM MILE |
|------------------------|------------------|---------------|------------|-------------------------------|-------------------------------|
| Bloomington ISD | \$344,890 | 14 (2) | 358 | \$3.10 | \$1.19 |
| Odem-Edroy ISD | \$451,209 | 12 | 314 | \$5.59 | \$1.45 |
| Skidmore-Tynan ISD | \$497,662 | 24 | 335 | \$3.89 | \$1.99 |

NOTES:

(1) Information for Santa Gertrudis ISD was not available from the Texas Education Agency for school year 2020–21.

(2) Bloomington ISD provided the bus count.

SOURCES: Texas Education Agency, Transportation Operations Report and Route Services Report, school year 2020–21; Bloomington ISD, October 2021.

The district lacks protocols to guide transportation staff in their daily activities or in emergency situations. The Transportation Department staff conduct their job duties based on the word-of-mouth knowledge of the staff, without a specific source document for guidance.

Bloomington ISD has legal and local Board of Trustees (board) policies covering basic transportation-related information such as bus maintenance, bus driver credentials, and safety of students. However, the district lacks a transportation-specific manual that contains procedures for executing these policies and staff do not have documented reference materials to consult when questions arise. The district's process for recording transportation data also is not clearly defined and lacks a review process to ensure accuracy for state reporting. The Legislative Budget Board's School Performance Review Team visited the district in October 2021. During the onsite visit, department staff were unable to provide basic information that is required for TEA reporting. In addition, the information the district reported to TEA regarding the size and composition of its vehicle fleet did not match the vehicles the district claimed in its asset reports.

Staff reported that bus drivers conduct a bus inspection before every route or trip in the vehicle. However, no documentation is included regarding how the process is monitored and by whom, or how preventive maintenance inspections are documented.

The efficiency and effectiveness of a transportation operation largely depends on the knowledge of the staff. The development and adoption of safety-related procedures helps to inform all transportation staff of the safety standards and supporting rules and regulations that are intended to promote students' safety. Without such procedures, department staff unknowingly may violate student transportation rules and regulations. Lack of written procedures could result in staff being unaware of important procedures they are expected to follow in certain situations. Failing to conduct and document pre-trip and post-trip bus inspections and operating buses without documented preventive maintenance inspections could expose the district to liability from an accident, because it would be more difficult to assess whether an accident resulted from a lack of proper maintenance, equipment failure, driver error, or other issues.

The lack of standard operating procedures is exacerbated at Bloomington ISD because of the transportation director's lack of experience in the district and in the field of public education transportation. Overseeing a department without established

operating procedures increases the likelihood that the department will not operate as effectively or efficiently as possible.

Bloomington ISD should develop written standard operating and safety procedures, including safety protocols, for transportation staff functions.

The transportation director should collaborate with bus drivers and other staff as needed to develop a transportation manual that includes all standard operating procedures for the department, including the following information:

- the mission and organization of the Transportation Department;
- a detailed description of the daily responsibilities of Transportation Department staff; and
- departmental safety procedures, including the following areas:
 - pre-trip and post-trip school bus inspections;
 - railway crossing procedures;
 - loading zone procedures;
 - departmental training policies;
 - ride-time goals;
 - processes for monitoring and reporting performance to TEA;
 - procedures to follow for an accident;
 - wheelchair lift operations; and
 - student behavioral management techniques.

The transportation director should submit a draft of the manual to the superintendent for review and approval. Upon approval by the superintendent, the transportation director should print and distribute the manual to all Transportation Department staff at the beginning of each school year and to every newly employed bus driver, substitute bus driver, and bus aide.

The district could implement this recommendation with existing resources.

MANUAL PROCESSES (REC. 23)

Bloomington ISD relies on manual, paper-based processes for transportation operations and record keeping.

Bloomington ISD relies primarily on paper-based record keeping to track and report Transportation Department

activities. The department has no automated system for recording, tracking, or receiving information, nor a centralized records management process to document consistently and track data related to fleet management, accident reports, and information required for TEA reporting. Additionally, the district does not use routing software to determine the most efficient bus routes to deliver students to and from school.

The transportation director typically receives staff requests for extracurricular events, athletic competitions, or field trips by telephone or email, and tracks the details, including vehicle scheduling information, on a white-board calendar in the transportation building. The district also relies primarily on paper-based systems for tracking vehicle maintenance and has not conducted an historical analysis of vehicle maintenance operations.

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 cannot use the department's hard-copy data as a reliable tool to inform decision making or track departmental progress. The limited, informal reporting lacks consistency to help guide the management of the Transportation Department.

A result of relying on manual processes to record and track information is that some data or requests may not be entered, and records may not be up to date. When the review team requested an inventory of buses and district white-fleet vehicles, the transportation director reported that no such documentation existed.

Bloomington ISD should utilize transportation technology effectively to minimize administration, enable analytics, and improve effectiveness and efficiency of operations.

The transportation director should examine and redevelop the manual data management processes to ensure the consistent and accurate collection of transportation data for use in decision making and required state transportation reporting. Organizing the information into an electronic format that can be accessed easily, updated, and used for reporting purposes will provide the department with a more effective and efficient tracking and reporting system than the current paper-based system. To begin, the district could use a free Web-based software system to record and track data for reporting and for analyzing metrics. The district also should consider purchasing

a routing software system to optimize bus routes for the most efficient pick-up and drop-off of students.

Developing a consistent record-keeping system for the district's Transportation Department can help to improve processes for planning routes and schedules, procurement, inventory, preventive maintenance, and staffing, and will minimize administration, enable analytics, and improve operations.

The district could use free Web-based software to begin the process of data tracking. The transportation director in collaboration with the technology director should research available routing software programs to determine costs and to assess systems that will meet the district's needs. The transportation director should submit these findings with recommendations to the superintendent for consideration.

PERFORMANCE METRICS (REC. 24)

Bloomington ISD's Transportation Department lacks performance metrics to guide the management of the department and assess its effectiveness and efficiency.

Transportation Department staff deliver students to and from school. The drivers conduct pre-trip bus inspections before collecting students every morning. In the afternoon, the bus drivers report to transport students home.

During onsite interviews, principals and coaches reported that the Transportation Department coordinates daily student transportation effectively at each campus and for afterschool student-activity transportation. However, the transportation director said that the department does not track any transportation-related performance metrics systematically, and the district has not established key performance indicators (KPI) for the department. KPIs track progress toward achieving an organization's objectives by monitoring activities that are critical to the success or failure of those efforts. Additionally, district staff were unable to report the on-time performance of buses because the district does not track this data.

A performance measurement system identifies a series of measurable goals and objectives. A desired goal or benchmark is established for each measurement based on industry standards and peer data. The department then documents its data and compares it to the benchmarks.

TEA requires school districts to submit both an operations report and a route-service report. The operations report shows the cost of regular and special education transportation and mileage and vehicle summaries. The route-service report

FIGURE 5–4
BLOOMINGTON ISD TRANSPORTATION DEPARTMENT EXPENDITURES
SCHOOL YEARS 2018–19 TO 2020–21

| KEY MEASURES | 2018–19 | 2019–20 | 2020–21 | PERCENTAGE CHANGE |
|--------------------------------------|------------------|------------------|------------------|-------------------|
| Total costs | \$444,053 | \$368,489 | \$344,890 | (22.3%) |
| Salaries and benefits | \$232,556 | \$201,227 | \$239,332 | 2.9% |
| Purchases | \$60,134 | \$56,435 | \$37,761 | (37.2%) |
| Supplies and materials | \$107,563 | \$98,523 | \$54,572 | (49.3%) |
| Depreciation/other operating expense | \$43,800 | \$12,304 | \$13,225 | (69.8%) |
| Cost per mile, regular program | \$4.16 | \$4.46 | \$3.10 | (25.5%) |
| Cost per mile, special program | \$3.03 | \$2.79 | \$1.19 | (60.7%) |

SOURCE: Texas Education Agency, Bloomington Student Transportation Operations Reports, school years 2018–19 to 2020–21.

captures program costs by category (regular, special education, and career and technical education) to calculate the funding allotment for each school district. **Figure 5–4** shows Bloomington ISD’s transportation expenditures from school years 2018–19 to 2020–21. Since school year 2018–19, the total cost of transportation has decreased by 22.3 percent. During the same period, the cost per mile of the regular transportation program decreased by 25.5 percent, and the cost per mile for the special program decreased by 60.7 percent based on TEA-reported data. Transportation Department staff neither tracks nor analyzes these cost data, and the district was unable to provide information to indicate that the data being provided to the TEA has been tracked and reported consistently from year to year.

The district has an obligation to ensure that students are transported safely, by the most efficient and effective means possible. Failure to track KPIs prevents the district from measuring how well the Transportation Department is functioning.

Effective districts use performance measurement systems to identify measurable goals and objectives. Districts establish a desired goal or benchmark for each measurement, document its data, and compare the data to the benchmarks. The process of continual improvement requires the use of benchmarks. **Figure 5–5** shows an example of transportation benchmarks used in other districts or noted in transportation research.

Establishing performance metrics for transportation operations enables a district to make data-driven decisions supported by objective evidence. Districts can determine how the department is functioning on a monthly or quarterly basis. The Bloomington ISD Transportation Department may not be operating as efficiently as possible. The district’s lack of tracking performance measures makes it difficult to

ensure that students are transported safely and in the most cost-effective manner.

Bloomington ISD should develop performance metrics to measure the effectiveness and efficiency of the Transportation Department.

The operations and route-service reports could provide a useful starting point for developing ideas for initial data to track for benchmarking and goal development. The transportation director should include goals with clear objectives and dates to accomplish critical tasks.

Figure 5–6 shows critical areas that the district should consider including in a tracking system for performance metrics.

The transportation director should compare actual performance against the selected benchmarks to determine where improvements are needed. The transportation director should report performance information, including goals and areas for improvement, to the superintendent regularly. After the initial set of performance metrics are established, the transportation director should communicate them to all stakeholders and provide the superintendent and board an annual report detailing the department’s operating results to support accountability and monitoring.

The district could implement this recommendation with existing resources.

BUS REPLACEMENT POLICY (REC. 25)

Bloomington ISD lacks a comprehensive, board-adopted, bus-replacement policy.

Bloomington ISD lacks a written bus or white-fleet-vehicle replacement plan. Through data the district provided to the review team and onsite interviews with staff, the district

**FIGURE 5–5
TRANSPORTATION INDUSTRY BEST PRACTICES
CALENDAR YEAR 2021**

| 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 | 3:25 to 3:20, depending on fleet composition and trip volume |
| Annual Driver turnover rate | Less than 15.0% |
| Parts cost per mile (without labor) | \$0.16 to \$0.18, depending on fleet type and age |
| Maintenance cost per mile (parts, supplies, and labor) | \$0.39 to \$0.43, depending on fleet type and age and assuming 13,000 miles per bus per year |
| Fleet miles per gallon (mpg) | 6.0 mpg to 7.0 mpg, depending on fleet composition, type, and 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, October 2021; Council of the Great City Schools, 2010; *American School and University* magazine, 2005; and National Association of State Directors of Pupil Transportation, 2010.

reported 14 school buses in its fleet, including 10 that are used in regular and special education routes, three that are used as spares, and an additional bus used for spare parts. According to the transportation director, the spare buses are licensed and registered but are rarely used by the department. The fleet has an average age of 17.3 years, ranging from one year to 29 years of age. Five trucks, one car, two sport-utility vehicles, and three vans constitute the district's white fleet, some of which may be used for transporting students on special trips or extracurricular activities that do not require the use of a bus. However, the district lacks a process to regularly inventory district vehicles, and the number of buses and white-fleet vehicles the district reported to TEA differed from what it reported to the review team.

During onsite interviews, staff reported that the new transportation director has been charged with assessing the fleet condition and making recommendations to the superintendent regarding the need to purchase or dispose of buses. Because the district makes ad hoc decisions about

**FIGURE 5–6
BLOOMINGTON ISD RECOMMENDED CRITICAL
TRANSPORTATION MEASUREMENTS, CALENDAR YEAR 2021**

| 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 Budget Board School Performance Review Team, October 2021.

when to replace buses, the new director will approach this task without the guidance of a policy containing industry replacement criteria, which well-managed transportation departments use as a best practice.

Bloomington ISD has purchased buses from multiple school bus manufacturers, including International, Bluebird, and GMC. Maintaining a bus fleet that consists of multiple bus brands can be challenging, because different buses require parts specific to each manufacturer.

Figure 5–7 shows the district’s bus inventory. Bloomington ISD has six buses that are more than 20 years old.

Regular investment in bus fleet replacement is important to ensure the ongoing safety, reliability, and efficiency of transportation services. Older vehicles are less reliable, leading to an increase in breakdowns and service disruptions, and the need to retain a higher proportion of spare vehicles in the fleet to cover more frequent and longer maintenance and repair activities. Older vehicles also lack the latest safety and environmental improvements in vehicle technology. An aging fleet with significant mileage typically has a higher cost of operation, including fewer miles per gallon, more frequent repairs, and higher repair costs.

School buses are a large capital expense, and a long-term comprehensive plan is critical for a district to be successful in providing safe, reliable, and fiscally responsible transportation. Failure to plan for the regular acquisition of school buses to refresh the fleet can force districts to make large purchases of buses all at once, which affects the general or capital fund budgets during these years.

Bus replacement is one of the most important transportation decisions that school districts make to maintain a sound fleet and stable budgeting. Although 11 states set maximum ages for school buses, Texas law contains no school bus replacement requirements for districts. The National Association of State Directors of Pupil Transportation Services, a membership organization of leaders in school bus transportation, published a white paper that promotes the timely replacement of school buses through a planned process. The association recommends a replacement cycle ranging from 12.0 years to 15.0 years, mitigated by local operational conditions and the extent of preventive maintenance necessary.

Buses older than 16 years often are not compliant with current regulations and policies. According to surveys conducted by School Bus Fleet, a resource and education center for public school transportation departments, the

FIGURE 5–7
BLOOMINGTON ISD BUS INVENTORY BY MODEL YEAR
SCHOOL YEAR 2021–22

| MODEL YEAR | BUS AGE (IN YEARS) | QUANTITY |
|--------------|--------------------|-----------|
| 2021 | 1 | 2 |
| 2013 | 8 | 1 |
| 2009 | 12 | 1 |
| 2006 | 15 | 2 |
| 2002 | 19 | 2 |
| 2000 | 21 | 1 |
| 1999 | 22 | 1 |
| 1997 | 24 | 1 |
| 1993 | 28 | 1 |
| 1992 | 29 | 2 |
| Total | | 14 |

SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

average age of school buses was 9.3 years in 2013, which is less than Bloomington ISD’s buses’ average age of 17.3 years.

Bloomington ISD should develop a board policy to guide bus and white-fleet-vehicle replacement and disposal based on the vehicle’s mileage and age.

To establish a replacement plan, the district should perform the following steps:

- finalize the number of buses used on daily routes, which may be influenced by data derived from a review of current routing;
- determine the total useful life, years, and miles of a bus in the local operating environment;
- establish the average number of miles per year each route bus is projected to accumulate, including field trip mileage; and
- analyze the white fleet and determine plan for replacement of vehicles according to district needs.

The Bloomington ISD transportation director should develop the policy in coordination with the superintendent. After the policy has been developed, the superintendent should submit it to the board for consideration. The policy should be data-driven, based on objective criteria such as miles, age of the school bus, and parts used to maintain serviceability, or a combination of criteria. The replacement criteria will help the district minimize maintenance costs,

streamline the process to maintain a cost-effective school bus fleet, and reduce the average age of the fleet.

No fiscal impact is assumed for this recommendation. The short-term and long-term impacts of this recommendation cannot be determined until the district develops its bus replacement plan and performs an analysis of associated costs based on the life cycles of the vehicles in the fleet.

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.

STUDENT SAFETY IN BUS ZONE

The district has no dedicated bus lane at the point where students enter and exit buses at Placedo Elementary School. Buses park on the side of a two-lane roadway to collect and deliver students at the campus. Transportation Department staff, the superintendent, and the campus principal should develop additional procedures to increase student safety in this zone. The district also should evaluate long-term options to modify the facilities at Placedo Elementary School to address the potential safety concerns.

BUS COMMUNICATIONS

Bloomington ISD's Transportation Department lacks an efficient way to communicate with its drivers for daily operational information or during emergencies. The district has not equipped its vehicles with communication devices, and drivers use their personal mobile phones to communicate with the transportation director if an issue occurs while driving a route. The use of mobile phones presents the following operational risks:

- the cellular device may fail or be unable to connect to a mobile network;
- during an accident or other incident, first responders on dedicated channels cannot monitor communications on mobile phones as they could on two-way devices; and
- some drivers may use cell phones improperly when students are aboard the vehicles.

Bloomington ISD should investigate the cost and benefits of implementing a two-way radio system to ensure clear

communications between bus drivers and district staff or, when necessary, emergency personnel. The district also should formalize a protocol for how drivers use their mobile phones when driving routes.

SCHOOL TRANSPORTATION TRAINING

Bloomington ISD's Transportation Department lacks public school transportation-related management experience.

At the time of the review team's onsite visit, the transportation director had been employed by the district for two months. Although the director has an operations background, he has no public school or transportation-related experience. The director is learning the responsibilities of his position on the job and has begun developing standardized processes and written procedures. However, the district has not established a budget or training plan for transportation staff, nor is a program in place to train the new director on his roles and responsibilities.

The district should consider developing an ongoing training program for transportation staff to help guide and support professional development and promote industry standards that help to build public school transportation knowledge.

The district could contact organizations that offer training for transportation directors, such as the National Association for Pupil Transportation's Certified Director of Pupil Transportation program. Additionally, the district should collaborate with regional Education Service Center III and transportation directors in other nearby districts to gather best practice information that the Transportation Department could use to optimize its services to meet the district's transportation needs.

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.

6. FACILITIES AND SAFETY MANAGEMENT

FINDINGS

- ◆ Bloomington ISD does not plan adequately for facilities management and future facility needs.
- ◆ Bloomington ISD relies on informal processes for maintenance operations and record keeping.
- ◆ Bloomington ISD lacks comprehensive documentation of safety and security procedures.
- ◆ Bloomington ISD lacks an adequate monitoring process to ensure its multihazard emergency operations plan and preparedness drills are consistent, updated, and include required components for all campuses.
- ◆ Bloomington ISD does not meet staff and students' physical security needs effectively and consistently.

RECOMMENDATIONS

- ◆ **Recommendation 26: Establish a five-year facilities master plan and update the plan annually.**
- ◆ **Recommendation 27: Formalize maintenance processes and develop a detailed procedures manual for the Maintenance Department.**
- ◆ **Recommendation 28: Develop a procedures manual to guide safety and security operations in the district.**
- ◆ **Recommendation 29: Update campus emergency operations plans and monitor plans and drills to ensure consistency and compliance with statutory requirements.**
- ◆ **Recommendation 30: Strengthen visitor management procedures and assess the need for additional physical security upgrades at district facilities.**

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.

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 for protecting 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 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.

FACILITIES MANAGEMENT

Figure 6-1 shows Bloomington Independent School District's (ISD) facilities management organization for

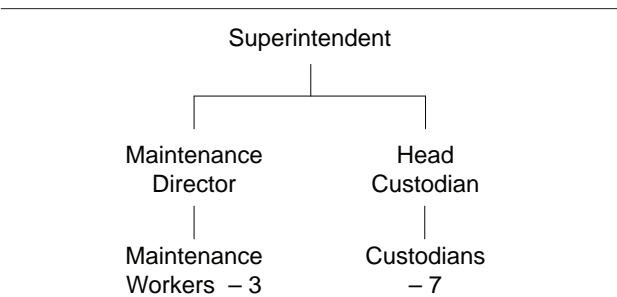
school year 2021–22. The district’s maintenance director reports to the superintendent and manages three maintenance staff. These staff primarily perform general maintenance, but some have additional training in heating, ventilation, and air conditioning (HVAC) and electrical repairs. The district outsources groundskeeping to a contracted staff and outsources larger repairs to local vendors. The district’s head custodian reports to the superintendent and supervises a staff of seven full-time custodians assigned to the district’s campuses and administrative buildings.

Bloomington ISD has five campuses: an elementary school in Placedo; an elementary school in Bloomington; and a secondary complex outside Bloomington that contains the middle school and high school buildings and Crossroads Connect Academy, the district’s alternative school. The district also owns and maintains an administrative building adjacent to Placedo Elementary School, a maintenance and transportation facility adjacent to the secondary complex, an agricultural complex, sports facilities, and two district residences. Most of the campuses were built in the 1950s and 1960s and since have received additions and renovations, including repairs after damage from severe weather events such as Hurricane Harvey in 2017. At the Bloomington Elementary School campus, the district used Federal Emergency Management Assistance (FEMA) funds to construct a gymnasium in 2014 that contains emergency equipment, including a water filtration system and generators that can be used by students, staff, and the community during emergencies. **Figure 6–2** shows Bloomington ISD’s properties, including the year of construction and square footage for district buildings.

The Legislative Budget Board School Performance Review Team visited the district in October 2021. During the onsite visit, the review team observed that, although most of the district’s facilities are older buildings, the district maintains consistent levels of cleanliness at all campuses. Staff interviews also indicated that the Custodial Department provides consistent, high-quality cleaning services throughout district facilities and is accessible and responsive to feedback.

Figure 6–3 shows the actual facilities maintenance and operations costs for Bloomington ISD and its peer districts for school year 2019–20. Peer districts are districts similar in size and other characteristics to Bloomington ISD that are used for comparison purposes. The peer districts for Bloomington ISD are Odem-Edroy ISD, Santa Gertrudis ISD, and Skidmore-Tynan ISD. Bloomington ISD spent approximately \$1,467,040 for facilities maintenance and

**FIGURE 6–1
BLOOMINGTON ISD FACILITIES MANAGEMENT ORGANIZATION
SCHOOL YEAR 2021–22**



SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

**FIGURE 6–2
BLOOMINGTON ISD FACILITIES
SCHOOL YEAR 2021–22**

| FACILITY | YEAR OF CONSTRUCTION | SQUARE FOOTAGE |
|---|----------------------|----------------|
| Bloomington High School | 1957 | 100,433 |
| Bloomington Middle School | 1966 | 23,353 |
| Bloomington Elementary School | 1966 | 66,407 |
| Placedo Elementary School | 1966 | 39,621 |
| Administrative building | 1950 | 1,632 |
| Maintenance and transportation building | 2011 | 3,588 |
| Crossroads Connect Academy | 1957 | 3,261 |
| Agricultural complex | 2008 | 2,908 |
| Football stadium | 1985 | 834 |
| Superintendent’s residence | 2015 | 1,680 |
| District residence | 1970 | 2,197 |
| Total | | 245,914 |

SOURCE: Texas Association of School Boards, Risk Management Assessment, calendar year 2016.

operations, which was greater than each of its peer districts and the peer district average. Bloomington ISD’s facilities maintenance and operations expenditures represented 12.7 percent of its total operating expenditures and \$1,770 per student. For school year 2020–21, Bloomington ISD budgeted approximately \$1.5 million for facilities maintenance and operations.

In preparation for a November 2021 facilities bond proposal, the district established a bond committee of 14 individuals including district administrators, teachers, community representatives, and a Bloomington ISD Board of Trustees

**FIGURE 6–3
BLOOMINGTON ISD AND PEER DISTRICTS’ FACILITIES MAINTENANCE AND OPERATIONS COSTS
SCHOOL YEAR 2019–20**

| DISTRICT | ALL FUNDS | FACILITIES MAINTENANCE AND OPERATIONS | PERCENTAGE OF ALL FUNDS | ENROLLMENT | COST PER STUDENT |
|------------------------|---------------------|---------------------------------------|-------------------------|------------|------------------|
| Odem-Edroy ISD | \$11,431,259 | \$1,349,962 | 11.81% | 846 | \$1,596 |
| Santa Gertrudis ISD | \$9,088,197 | \$1,402,101 | 15.43% | 810 | \$1,731 |
| Skidmore-Tynan ISD | \$9,733,316 | \$1,108,812 | 11.39% | 826 | \$1,342 |
| Peer average | \$10,084,257 | \$1,286,958 | 12.88% | 827 | \$1,556 |
| Bloomington ISD | \$11,551,329 | \$1,467,040 | 12.70% | 829 | \$1,770 |

SOURCES: Legislative Budget Board School Performance Review Team, October 2021; Texas Education Agency, Public Education Information Management System, school year 2019–20.

member. The committee assessed the needs of district facilities and identified the highest-priority projects for the bond proposal. **Figure 6–4** shows the Bloomington ISD bond committee’s recommended improvements and estimated costs as of March 2021.

Although the bond would not have increased taxpayer contributions, voters did not ratify the proposed bond at the November 2 election.

SAFETY AND SECURITY MANAGEMENT

Bloomington ISD’s safety and security operations are overseen by the superintendent, a contracted school resource officer (SRO), and a safety-and-security coordinator. The safety-and-security coordinator is the counselor for grades six to 12 and serves several additional roles, such as the student-and-community-engagement director and district grant coordinator. Both the SRO and safety-and-security coordinator report to the superintendent. In addition to their primary position duties, the behavior coordinator, campus principals, and maintenance director have some safety and security responsibilities. These responsibilities include monitoring campus safety and security issues with students, staff, and parents; issuing keys; and maintaining locks. **Figure 6–5** shows the organization of safety and security staff.

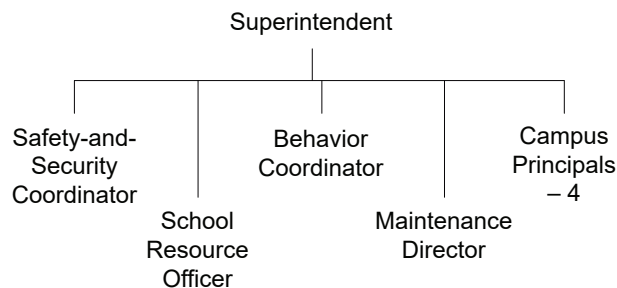
Bloomington ISD contracts with the Victoria County Sheriff’s Office for an SRO. The district’s SRO has served Bloomington ISD for two years and is an experienced deputy sheriff and master peace officer. The SRO monitors surveillance video and campus security at the secondary campuses, interacts with students, assists with managing criminal student behavior, provides active shooter and threat assessment training to staff, provides input on safety and security issues, and responds to requests for support from the elementary campuses or administrative facilities as

**FIGURE 6–4
BLOOMINGTON ISD BOND PROPOSAL
NOVEMBER 2021 ELECTION**

| PROPOSED ITEM | ESTIMATED COST |
|---|--------------------|
| Campus safety and security, including cybersecurity | \$265,806 (1) |
| Agricultural complex and welding shop renovations | \$165,454 |
| Agricultural complex upgrades | \$405,000 |
| Life skills classrooms additions | \$25,000 |
| Career and technical education transportation and trailer | \$100,000 |
| General maintenance | \$100,000 (2) |
| Total | \$1,061,260 |

NOTES:
 (1) Estimate does not include additional pending quotes.
 (2) Estimate does not include pending quotes for roofing.
 SOURCES: Legislative Budget Board School Performance Review Team, October 2021; Bloomington ISD Bond Proposal, March 2021.

**FIGURE 6–5
BLOOMINGTON ISD SAFETY AND SECURITY
ORGANIZATION, SCHOOL YEAR 2021–22**



NOTE: The behavior coordinator, campus principals, and maintenance director have secondary safety and security responsibilities in addition to their primary position duties. The secondary counselor serves several roles, including safety-and-security coordinator and student-and-community-engagement director.
 SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

FIGURE 6–6
BLOOMINGTON ISD AND PEER DISTRICT SECURITY AND MONITORING SERVICES COSTS
SCHOOL YEAR 2019–20

| DISTRICT | ALL FUNDS | SECURITY AND MONITORING SERVICES | PERCENTAGE OF ALL FUNDS | ENROLLMENT | COST PER STUDENT |
|------------------------|---------------------|----------------------------------|-------------------------|------------|------------------|
| Odem-Edroy ISD | \$11,431,259 | \$41,910 | 0.37% | 846 | \$50 |
| Santa Gertrudis ISD | \$9,088,197 | \$40,904 | 0.45% | 810 | \$50 |
| Skidmore-Tynan ISD | \$9,733,316 | \$24,058 | 0.25% | 826 | \$29 |
| Peer Average | \$10,084,257 | \$35,624 | 0.36% | 827 | \$43 |
| Bloomington ISD | \$11,551,329 | \$110,201 | 0.95% | 829 | \$133 |

SOURCES: Legislative Budget Board School Performance Review Team, October 2021; Texas Education Agency, Public Education Information Management System, school year 2019–20.

needed. The district provides the SRO with an office at the high school campus and computer equipment; the sheriff’s office provides the SRO with a vehicle and all other law enforcement equipment.

The safety-and-security coordinator provides campus administrators and department heads with compliance information from outside organizations, such as regional Education Service Center III (Region 3) and the Texas School Safety Center; manages emergency preparedness; provides staff with resources and training information; and develops safety-related assessments and reports.

The district utilizes several communication tools to update families during emergencies. The safety-and-security coordinator distributes information using the district website, social media accounts, a districtwide messaging application, and an additional notification application for the middle and high school campuses. Additionally, the coordinator communicates emergency information to local media. The district’s website is used for online registration and requires parents to confirm their email addresses for emergency communications, which increases the likelihood that the district will have current contact information. **Figure 6–6** shows the actual security and monitoring costs for Bloomington ISD and its peer districts for school year 2019–20. Bloomington ISD spent \$110,201 on security and monitoring services, which was higher than each of its peer districts and the peer district average. At \$133 per student, Bloomington ISD’s security and monitoring expenditures represented less than 1.0 percent of its total operating expenditures, which was \$90 more than the average cost per student for peer districts. For school year 2020–21, Bloomington ISD budgeted approximately \$81,000 for security and monitoring services.

DETAILED FINDINGS

MASTER PLANNING (REC. 26)

Bloomington ISD does not plan adequately for facilities management and future facility needs.

Bloomington ISD’s approach to managing its facilities is reactive and does not include conducting any long-term planning. For example, the district lacks a facilities master plan (FMP), which is a document that provides a high-level, long-term framework used by effective districts to ensure their facilities continue to support excellence in teaching and learning. An FMP identifies existing facility conditions, new or replacement facilities required to meet district needs, and funding options.

A well-developed FMP supports a highly effective educational system across many operational areas, including the following examples:

- providing a baseline element for decisions about district facilities;
- ensuring that district facilities continue to meet current and long-range educational programming needs;
- facilitating input on district facilities from all stakeholders, including the community, parents, students, and staff;
- clearly communicating the district’s facility requirements and goals; and
- providing a basis for developing bond proposals to support facility improvements and accomplish educational initiatives.

Bloomington ISD’s superintendent stated that efforts to develop a multiyear facilities plan were hindered by

challenges such as the COVID-19 pandemic. Although the superintendent reported plans to develop a five-year facilities plan, development and implementation of this plan had not begun at the time of the onsite visit, nor had they been scheduled.

Decisions about major facility renovations or upgrades are made ad hoc as staff identify needs and report them directly to the superintendent. Considering the small size of the district, stakeholders such as principals and the maintenance director discuss facility needs with the superintendent; however, the district has no defined process for prioritizing or budgeting for facility issues. During interviews, staff identified numerous district facility needs, including gas and water connections for laboratory classrooms, roof replacement for the high school, electrical upgrades, and repairs to the high school gym to prevent flooding. However, campus and departmental administrators could not articulate clearly the district's process for addressing these facility needs.

The bond committee conducted a facilities condition assessment to prepare the proposal for the November 2021 election. However, the committee and its assessment were focused on preparing this specific bond proposal, and the district did not establish a role for the committee in ongoing district facilities planning, including any process for conducting annual facilities condition assessments. After voters rejected the bond proposal, district staff had not identified alternative funding sources or budgets for identified facility needs, which range from an estimated \$1.1 million to \$1.2 million.

The district also lacks an effective, ongoing process for assessing facility conditions. Staff, including the maintenance director, superintendent, and board members, inspect facilities annually, but the process is informal, is not documented, and does not drive a comprehensive assessment for facilities planning.

Additionally, the district addresses building capacity issues as they arise and does not conduct assessments of district facility utilization or types of space. Without planning for utilization, the district made short-term decisions about the placement of some specialized classrooms based on available space instead of the building's design specifications. For example, staff reported that the district placed the in-school suspension classroom, disciplinary alternative education program, and credit recovery program at the middle school campus in space that was available because it was unsuitable for its intended purpose of housing science laboratories due to the

lack of water and gas connections needed for experiments. District staff also reported that the Life Skills program, the district's educational placement for special education students with significant cognitive disabilities, had moved several times. These relocations were reactive, required upgrades to the new space, and are not conducive to maintaining a stable learning environment. The district still has not developed long-term plans to best meet the facility needs of its Life Skills students.

Without a comprehensive FMP, a district is unable to ensure that it directs resources to the highest priorities. The lack of an FMP also may result in underutilized campuses and increased operating costs. Additionally, without an FMP, a district cannot budget funds effectively to maintain and enhance its facilities properly. Without an annual condition assessment process, the district may be unable to identify and address critical maintenance issues promptly. The lack of planning for facilities utilization may hinder educational opportunities and hamper the district's ability to utilize specialized facilities as intended.

"Heightened Change Awareness and Responsiveness Through Continuous Facility Master Planning," a 2016 report published in the *Journal for Facility Management*, emphasizes the importance of an FMP in guiding the development of existing facilities into educational environments that align with the district's mission. The FMP coordinates and aligns several diverse considerations into a strategic long-term vision for facilities. For example, Waco ISD has developed a detailed FMP, available on its website, which describes how the district's facilities and bond planning processes align with its educational vision and goals.

The Texas Administrative Code, Title 19, Chapter 61, Subchapter CC, Commissioner's Rules Concerning School Facilities, encourages school districts to develop a long-range facilities plan before making major capital investments. When formulating a plan, a school district's process should allow for input from teachers, students, parents, taxpayers, and other interested parties that reside within the school district.

Bloomington ISD should establish a five-year FMP and update the plan annually.

The superintendent should establish a facilities master planning team led by the maintenance director. Team members should include the business manager, department heads, selected campus principals, teachers, custodial staff, and community representatives.

The team should adopt a formal facilities master-planning process to develop and implement the plan, beginning with an assessment of the district's current and future facility needs for each of its instructional, noninstructional, and auxiliary facilities. To accomplish this needs assessment, the district should perform the following actions:

- assess the capacity of each campus facility by setting standards that govern student-to-teacher ratios and the amount of square feet required per student in a classroom. These standards should specify the minimum size of core facilities, such as classrooms, gymnasiums, cafeterias, and libraries, so that campuses do not overload these facilities or overuse portable classrooms;
- develop a facility inventory that identifies the use and size of each room at each campus;
- analyze student enrollment to establish accurate enrollment projections for at least five years; and
- solicit input from district staff, students, community representatives, and other stakeholders. Methods may include establishing a subcommittee, conducting periodic meetings for feedback, and enabling stakeholders to submit feedback through the district's website.

After completing the needs assessment, the planning team should analyze the available data and develop a five-year FMP that includes the status of each facility, facility goals and objectives, recommendations for facility improvements, and projected costs for these improvements. In developing the plan, the district should consider expected changes to facility needs, including curriculum and technology, safety and security developments, and the incorporation of local, state, and federal requirements. The plan should prioritize projects and objectives based on facility safety, longevity, and educational requirements.

The district should submit the FMP to the board and superintendent for review and approval and update the plan annually to ensure the continuous assessment of the district's facility needs.

The district could implement this recommendation with existing resources.

MAINTENANCE OPERATIONS (REC. 27)

Bloomington ISD relies on informal processes for maintenance operations and record keeping.

The Maintenance Department is organized and operated through the institutional knowledge of staff and lacks formal procedures and processes to guide key operational decisions and maintenance activities. The lack of formal processes includes the areas of staffing, work order management, training, preventive maintenance and product warranties, and inventory management.

STAFFING

The staffing of Bloomington ISD's Maintenance Department is not based on industry standards or through a set staffing formula. The maintenance director supervises three maintenance staff. The maintenance director reported that staff work in pairs for safety and that the director has not analyzed staffing information to determine how many staff the district needs. Most district and campus staff reported in interviews that they could not evaluate whether the maintenance staff levels were sufficient, or possibly excessive, because maintenance staff hours dedicated to assignments are inconsistent and not monitored.

WORK ORDER MANAGEMENT

The district manages its daily maintenance operations through work order requests that Bloomington ISD staff enter into an online system. The maintenance director issues printed work orders generated through the system to maintenance staff and closes the work orders after staff perform the requested maintenance. The district does not use the work order system to track equipment repairs, the time it takes to repair equipment, repair costs, or staff performance. The maintenance director does not create reports through the work order system to evaluate the district's existing and future facility needs, develop maintenance plans, or to evaluate staffing levels.

TRAINING

According to information gathered from staff interviews, the department typically hires staff with previous maintenance experience and employs on-the-job training to impart district-specific knowledge to new staff, which includes assigning them to follow and observe veteran staff as they perform their duties. Some maintenance staff reported pursuing additional training or specialization outside of the district; however, other than the maintenance director's integrated pest management certification, the district does

not recommend, incentivize, or track Maintenance Department training.

PREVENTIVE MAINTENANCE AND PRODUCT WARRANTIES

The district lacks a formal preventive maintenance process and relies on veteran staff's knowledge of when to perform recurring tasks. Preventive maintenance is the regular and routine maintenance of equipment and assets to maintain their operation and prevent any costly unplanned downtime from unexpected equipment failure. According to interviews, staff report observing some lapses or delays in preventive maintenance. The maintenance director reported that a previous district administrator began developing a written preventive maintenance plan and schedule in 2018, but the plan was not completed. At the time of the onsite visit, the district lacked a preventive maintenance schedule for planned maintenance tasks and equipment inspections. District staff also reported that product warranties are not consolidated or tracked centrally. Additionally, the district does not have a process to align warranties regularly with required preventive maintenance for the products they cover.

INVENTORY MANAGEMENT

The maintenance director reported keeping a checklist of purchased and disposed items, but the department does not have a formal process to inventory supplies, tools, and equipment. According to staff interviews, the district's small size enables maintenance staff to rely primarily on their informal knowledge of the inventory, and most staff use their personal tools.

Informal processes increase the risk of error and hinder oversight and performance monitoring. The district's lack of procedures contributes to the risk of ineffective maintenance operations if veteran staff leave employment from the district. The district's lack of staffing standards and the informal use of its work order management system hinder evaluation of whether the district is staffed appropriately and whether maintenance workers are assigned effectively and completing work orders. Understaffing could result in inadequate maintenance of the district's facilities, and overstaffing could result in unnecessary expenditures from the district's limited financial resources. Informal training could contribute to inconsistent or inaccurate completion of tasks and does not maximize opportunities for staff development.

Without clearly documented preventive maintenance schedules and procedures, the district risks equipment failures or decreases in the useful life of facilities and equipment. A lack of sufficient preventive maintenance can increase maintenance costs. Without a process that bases the maintenance schedule on product warranties, the district risks voiding warranties due to failure to complete required maintenance tasks. An informal inventory process hinders the district in tracking equipment and tools and preventing theft or loss.

Bloomington ISD should formalize maintenance processes and develop a detailed procedures manual for the Maintenance Department.

The maintenance director should develop a comprehensive procedures manual to document the standard operating procedures and formalized maintenance processes of the department, including the following elements:

- instructions for tracking and analyzing performance through the work order system;
- detailed steps for conducting all required preventive maintenance; and
- inventory procedures.

The maintenance director also should utilize reporting and analysis features of the work order management systems to track and identify trends in staffing assignments, monitor performance, and identify ongoing issues with facilities, equipment, or systems. Additionally, the maintenance director should document training requirements, recommendations, and opportunities for the director position and for maintenance staff.

The maintenance director should develop a comprehensive preventive maintenance plan and submit it to the superintendent and the board for review and adoption. **Figure 6–7** shows a sample preventive maintenance schedule the district could use as an example.

This preventive maintenance plan should include a process for managing product warranties and implementing any required preventive maintenance. The maintenance director should ensure that all maintenance staff are trained on the required steps for preventive maintenance tasks. The maintenance director should incorporate the preventive maintenance schedule into the work order management

**FIGURE 6–7
SAMPLE FACILITIES PREVENTIVE MAINTENANCE SCHEDULE, CALENDAR YEAR 2021**

| PREVENTIVE MAINTENANCE ACTIVITY | ACTIVITY FREQUENCY |
|---|---|
| Clean air-conditioning unit filters | Every 2 months |
| Change air-conditioning unit filters | Intervals ranging from 3 weeks to 12 weeks |
| Clean chiller condenser coils | Every 2 years |
| Clean fan coil and air handler evaporator coils | Annually |
| Clean ice machine condenser coils | Every 4 months |
| Inspect and test chillers’ capacity | Annually |
| Change chiller compressor oil and cores | Every 2 years |
| Check chemical levels in closed-loop chilled and hot water piping | Monthly |
| Clean grease traps | Every 3 months |
| Inspect and test boilers | Annually |
| Check roofs, downspouts, and gutters | Monthly; repair as needed |
| Inspect exterior lighting | Every 6 months |
| Inspect elementary school play gymnasium lighting | Annually |
| Inspect and clean gymnasium gas heaters | Annually |
| Inspect playground equipment | Monthly, repair as needed |
| Clean fire alarm system smoke detectors | Every 6 months |
| Inspect all interior and exterior bleachers | Annually, repair as needed |
| Clean, tighten, and lubricate roll-out bleachers | Annually |
| Check exterior building and concrete caulking | Annually – replace every 8 years |
| Repaint stripes in exterior parking lots | Annually |
| Check condition of asphalt parking lots | Annually – replace every 12 years |
| Examine carpeting | Check quarterly for damage and replace every 15 years, or as needed |
| Examine vinyl composition tile floors | Check quarterly for damage and replace every 20 years, or as needed |
| Spray-wash exterior soffits and building | Every 2 years or as needed |
| Replace glass and plastic glass | As needed |
| Paint interior of facilities | Every 5 years |
| Paint exterior of facilities | Every 8 years |
| Perform general facility inspections | Annually |

SOURCE: Legislative Budget Board School Performance Review Team, October 2021.

system to schedule reminders and document that all tasks have been completed.

The maintenance director should develop an updated, digitized inventory of all department equipment and supplies, including a process to regularly update inventory as the district acquires new equipment or disposes old equipment.

The district could implement this recommendation with existing resources.

SAFETY AND SECURITY PROCEDURES (REC. 28)

Bloomington ISD lacks comprehensive documentation of safety and security procedures.

Bloomington ISD has no written procedures for safety and security roles for staff and the contracted SRO. The current safety-and-security coordinator said that when she began her role, “it was a blank slate,” and that all paper documentation of procedures from previous staff had been destroyed by the effects of Hurricane Harvey. The SRO reported that the

district has no written procedures for the roles and responsibilities of the position.

The safety-and-security coordinator and other safety staff meet formally with the superintendent at least once every other month, and also hold frequent informal meetings with the superintendent. The safety-and-security coordinator provides regular reports to the board indicating areas of compliance and noncompliance for the district. The district has no documented expectations about communication or reporting for safety and security staff.

The Texas Education Code, Section 37.108, requires school districts to conduct a safety and security audit every three years and to report the findings of the district audit report (DAR) to the Texas School Safety Center (TxSSC), a research facility at Texas State University that conducts school safety initiatives outlined in statute. The superintendent and the safety-and-security coordinator completed the 2017 and 2020 audits and submitted the required DARs to the TxSSC. District staff have not developed written procedures for the DAR process and utilize an informal process to address deficits or recommendations identified in the audits. The superintendent said that it would be beneficial to the district to develop a formal process for addressing safety audit recommendations.

The Texas Education Code, Section 37.109, requires the district's school safety and security committee (SSC) to include the following members:

- the superintendent;
- the board of trustees' president;
- a second member of the district's board;
- one or more representatives of the district's police department, if applicable;
- one or more representatives of the local police department or sheriff's office;
- one or more representatives of an office of emergency management of the county or city in which the district is located;
- one or more designees of the superintendent, one of whom must be a classroom teacher in the district; and
- two parents or guardians of students enrolled in the district.

According to staff interviews and board meeting minutes, Bloomington ISD established an SSC during school year 2019–20 with all statutorily required members, and the safety-and-security coordinator informed members of their roles and responsibilities. However, the district did not provide the review team with agendas or meeting minutes that documented committee membership for school years 2020–21 and 2021–22; the most recent meeting minutes indicated limited attendance by committee members. Board Policy CK (LEGAL) documents the SSC expectations pursuant to the Texas Education Code requirements. However, the district lacks written procedures for the committee, such as schedules; agendas; communication guidelines; or detailed steps for conducting required tasks.

Without written documentation of safety and security procedures, Bloomington ISD staff, students, and community stakeholders could lack guidance for how to respond appropriately in at-risk situations. The district's lack of documented procedures also could hamper consistent compliance with statutory requirements, while placing the district at risk for ineffective, inefficient, or inconsistent establishment and operation of the SSC. The district also may fail to utilize the SSC consistently for required or appropriate safety processes and reports. Without written procedures for district expectations, new staff could fail to conduct and implement audits effectively and might lack the documentation necessary to continue implementation of the safety audit recommendations.

TxSSC's website includes School Safety and Security Committee Guidelines and sample committee meeting agendas as resources for Texas school districts. TxSSC recommends that the committee meet at least once a semester to review and update the district's multihazard emergency operations plan. Districts also should document committee meetings, maintain records in accordance with district policy, and develop a communication plan to disseminate committee information to stakeholders. TxSSC suggests that external safety experts can serve as collaborative partners to support district SSCs. The Region 3 website offers additional school safety resources, including an example school safety and security district manual created by El Campo ISD.

Bloomington ISD should develop a procedures manual to guide safety and security operations in the district.

The safety-and-security coordinator should draft a comprehensive safety and security manual for the district. The coordinator should meet with the superintendent to

outline the areas for procedure development, including the following elements:

- roles and responsibilities of security staff;
- expectations for the district SSC;
- a process for conducting, reviewing, and reporting safety audits;
- safety and security recommendations;
- an action plan for safety and security recommendations; and
- compliance with regulatory requirements.

The safety-and-security coordinator should review procedures manuals from other school districts and national standards to assist in identifying guidelines to include in the district’s manual. The superintendent should present the outline to the board for additional input and provide examples of procedures manuals from other districts. After the board has approved the procedures manual’s direction, the safety-and-security coordinator 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.

EMERGENCY PREPAREDNESS (REC. 29)

Bloomington ISD lacks an adequate monitoring process to ensure its multihazard emergency operations plan and preparedness drills are consistent, updated, and include required components for all campuses.

The Texas Education Code, Section 37.108, requires each school district to adopt and implement a multihazard emergency operations plan (EOP) for use in its schools. The EOP should address mitigation, preparedness, response, and recovery for various natural and other crises, such as those caused by a natural disaster or another immediate threat, for example. The districtwide EOP includes campus-specific plan components.

At the time of the onsite visit, the safety-and-security coordinator had developed the majority of the district’s EOP. The coordinator researched and completed relevant trainings, such as incident command training offered through the FEMA website, TxSSC trainings, and Region 3 trainings. The safety-and-security coordinator reported collaborating with additional staff and stakeholders as needed, including

**FIGURE 6–8
TEXAS SCHOOL DISTRICT REQUIRED EMERGENCY DRILLS
CALENDAR YEAR 2021**

| TYPE OF DRILL | FREQUENCY |
|--|------------------------------------|
| Secure (lockout) | 1 per school year |
| Lockdown | 2 per school year (1 per semester) |
| Evacuation | 1 per school year |
| Shelter-in-place (for hazardous materials) | 1 per school year |
| Shelter for severe weather | 1 per school year |
| Fire evacuation | 4 per school year (2 per semester) |

NOTE: School districts also should consult with local fire marshals and comply with local marshals’ requirements and recommendations.

SOURCE: The Texas Administrative Code, Title 19, Part 2, Chapter 103, Subchapter CC, Section 103.1209.

the SRO, maintenance director, and the Victoria County’s Office of Emergency Management.

The safety-and-security coordinator uploaded all EOP documents and templates to a shared drive accessible by all district and campus staff. She emailed staff to communicate their roles in EOP development and indicated which section each was responsible for completing. The safety-and-security coordinator directed each campus principal to complete their site-specific components of the plan and upload them to the shared folder.

However, campus administrators reported inconsistent levels of site-specific emergency planning. At one campus, the principal reported developing a comprehensive, updated EOP and distributing it to staff. The administrator also provided emergency kits to classroom teachers that were purchased using campus funds. Other administrators said that they had not yet developed EOPs for their campuses for school year 2021–22, or that they did not feel they had sufficient knowledge and training to develop these plans.

Statute requires that districts conduct mandatory emergency drills during the school year and provide for these drills in their EOPs. The Commissioner of Education, in consultation with TxSSC and the state fire marshal, has adopted rules for their frequency and scheduling in the Texas Administrative Code, Title 19, Part 2, Chapter 103, Subchapter CC, Section 103.1209. **Figure 6–8** shows the six required emergency drills for Texas school districts.

The safety-and-security coordinator developed a process for tracking fire drills and other emergency drills using

resources from TxSSC and forms developed in-house. The coordinator distributed these documents to campus administrators and directed them to submit the completed forms. Although the safety-and-security coordinator provided regular reminders to complete emergency drill tracking forms, no district staff verifies that the forms are completed or contain information documenting compliance with state requirements for emergency drills. Additionally, the district did not provide requested documentation of emergency drills to the review team. Department heads officed in noninstructional facilities also reported they do not conduct emergency drills with their staff.

Without current EOPs for all campuses, Bloomington ISD is not in compliance with statutory requirements, and the district may not be prepared fully for an emergency. Participating in drills and certifying proper evaluation and documentation enhances the district's emergency preparedness and reduces the risk of harm from such an event.

TxSSC recommends ongoing evaluation and monitoring as components of a high-quality EOP process. Its website provides extensive resources for planning, conducting, evaluating, and monitoring EOPs and emergency drills, including the *High-Quality Multi-Hazard Emergency Operations Plan Toolkit*. The FEMA website offers Incident Command System and National Incident Management System training for school staff to improve preparedness.

Bloomington ISD should update campus emergency operations plans and monitor plans and drills to ensure consistency and compliance with statutory requirements.

The superintendent and safety-and-security coordinator should survey campus principals to assess needs related to emergency preparedness planning and EOP development. The district then should provide training for staff as needed.

The safety-and-security coordinator should develop a schedule for monitoring completion of the district EOP, all campus-specific EOP components, and required safety drills. The superintendent should approve and oversee the monitoring schedule. The safety-and-security coordinator should develop districtwide preparedness drill procedures and ensure that campus principals and department heads receive training and support to implement the procedures.

The district could implement this recommendation with existing resources.

PHYSICAL SECURITY (REC. 30)

Bloomington ISD does not meet staff and students' physical security needs effectively and consistently.

Physical security refers to specific measures and equipment that are intended to deny unauthorized access to facilities and protect people and property from damage or harm. Such measures and equipment include visitor management systems, video surveillance, protective barriers, metal detectors, locks, intrusion detection sensors and alarms, and security guards.

When the review team visited instructional and noninstructional facilities in October 2021, it observed inconsistent visitor management procedures at campuses.

The district's four traditional campuses operate electronic visitor management systems, and reception office staff require visitors to sign in using paper forms and present valid identification. The electronic visitor management system conducts background checks, generates printed visitor badges, and monitors visitors; however, some campuses did not have the equipment necessary to print visitor badges. In addition to inconsistencies in the visitor sign-in process, the district did not have clear requirements that all visitors must sign out at the offices using the paper or electronic systems and that they must return or destroy their visitor badges. The review team did not observe any visitor management procedures in place at the district's noninstructional facilities.

According to district staff, Bloomington ISD's visitor management procedures were developed during a previous administration, and current staff continued to implement these procedures based on historical knowledge. District staff identified visitor procedures as an area for improvement. Bloomington ISD's formal procedures for visitor management appear in Board Policy GKC (LEGAL), requiring visitor identification and sex offender verification, and Board Policy GKC (LOCAL), requiring signage directing visitors to the campus main office. The board has not adopted a detailed local policy to be applied throughout the district. The district has no documented procedures for visitor management in its publications, such as student or employee handbooks.

Additionally, Bloomington ISD's campuses and administrative buildings have inconsistent access controls and video surveillance.

At the elementary campuses, the buildings can be entered through a single access point with a remote admission system operated by main office staff. All exterior doors are

locked or enclosed within a perimeter fence. The middle school and high school campuses also have remote admission systems at their main offices, but the campuses have multiple points of entry. According to staff and signs on campus, teachers and students at the middle school and high school are instructed to keep all exterior doors locked during the school day. However, review team observations and staff interviews indicate that some exterior doors frequently are kept ajar or unlocked to facilitate student access to unattached classrooms and buildings. The Crossroads Connect Academy had no perimeter fencing, an unlocked front entrance, and no visitor management procedures or access controls.

Staff also reported that video surveillance in the district is inconsistent due to insufficient cameras for coverage and outdated access systems for older cameras. The SRO reported receiving some additional and updated cameras, but the district has not performed a formal analysis of its video surveillance inventory.

Bloomington ISD's effectiveness with physical security is limited further by the districtwide lack of alarm systems and access controls apart from main entrances. The district uses mechanical keyed locks, and building doors are not controlled by electronic locking mechanisms.

The roles of district and campus staff in assessing and monitoring physical security are not defined clearly. The superintendent, safety-and-security coordinator, SRO, behavior coordinator, maintenance director, and campus administrators reported that they informally assess the security of the facilities regularly, and they have discussed with supervisors their observations regarding physical security needs, such as fencing or camera updates. Staff described this process as informal, and the district has not developed expectations or written guidelines for monitoring, prioritizing, or reporting physical security needs.

The district acknowledged the need for improvement to its physical security in preparation for the November 2021 bond election. The district formed a bond committee of staff and community members, which identified the following campus safety and security needs:

- vestibule doors at campuses, districtwide;
- districtwide security system;
- districtwide radio-frequency identification tags;
- districtwide digital intercom system;

- fencing for secondary campuses;
- speakers for certain areas of secondary campuses; and
- fencing, electric gate, and security cameras for the agriculture complex.

The bond committee identified and made recommendations for physical security enhancements. However, this ad hoc committee is not part of an ongoing assessment process involving all relevant district staff and stakeholders. Furthermore, voters did not approve the November 2021 bond proposal, and the identified needs remain without the funding to meet them. At the time of the onsite visit, which concluded before the November 2 election, district staff reported plans to research grant opportunities for the safety and security-related bond items if the initiative did not pass.

Gaps in safety and security practice could increase the potential for emergencies and threaten the safety of Bloomington ISD students and staff. The district's campus access control and visitor management practices could enable unauthorized individuals to gain access to campuses undetected. Deficits in the district's video surveillance system could limit the ability of district staff to monitor safety and security concerns.

Partner Alliance for Safer Schools is an organization that supports school safety and provides districts with safety information and tools. Its Safety and Security Guidelines for K–12 Schools provide best practices for improving many aspects of school physical safety and security, including the importance of access controls, video surveillance, and alarms and detection as components of safe schools.

A Systems Approach to Physical Security in K–12 Schools, a 2020 report produced by the Homeland Security Operational Analysis Center, a federally funded research and development center operated by the RAND corporation, states that school districts “will be best placed to achieve safety and security benefits when they take a layered approach to protection and mitigation. Measures in place at the campus perimeter, school grounds, building perimeter, and building interior provide incremental protection against threats and help prevent single points of failure. How schools prioritize certain layers over others will depend on their unique contexts, including the surrounding neighborhood, campus and building layout, student population, and geographical location.”

The U.S. Department of Homeland Security, U.S. Department of Education, U.S. Department of Justice, and the U.S. Department of Health and Human Services established

SchoolSafety.gov to share actionable recommendations to address safety for school communities. SchoolSafety.gov includes resources for finding grants for school safety, including a library of available grants and matching tools.

Bloomington ISD should strengthen visitor management procedures and assess the need for additional physical security upgrades at district facilities.

The safety-and-security coordinator should oversee the development of written visitor management procedures for all instructional and noninstructional facilities. The coordinator should train all staff, students, visitors, families, substitutes, and vendors regarding these procedures. District staff should ensure that all campuses have functional visitor management systems with the capability to print visitor badges. The superintendent and campus administrators should ensure that all campuses and district facilities are complying with the procedures. The safety-and-security coordinator, with input from the SSC, should develop a schedule for implementation and ongoing monitoring of visitor management procedures across the district. The safety-and-security coordinator should provide monitoring reports to the superintendent and the board regularly. The superintendent should recommend that the board incorporate these detailed visitor management procedures into local board policy.

The superintendent, safety-and-security coordinator, SRO, campus administrators, and the SSC should perform the following tasks:

- define roles, responsibilities, and procedures for annual evaluations and ongoing monitoring of physical security;
- assess the district's current visitor management and video surveillance systems and associated equipment;
- consult best practices in physical security;
- review existing physical security recommendations from the bond committee and from the most recent district audit report;
- evaluate the need for additional safety and security upgrades in the district, such as perimeter fencing, access controls, video surveillance, and alarm systems; and
- make strategic recommendations and estimates for projects and equipment, including a prioritized order of implementation.

No fiscal impact is assumed regarding additional safety upgrades until district staff have assessed and recommended to the superintendent those that would fit the district's needs best.

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.

REMOTE HVAC SYSTEM

The technology director controls the district's heating, ventilation, and air-conditioning (HVAC) system remotely. Staff submit an electronic request to the Technology Department to change the thermostat in classrooms or offices. If a persistent issue with a thermostat is reported, the technology director forwards the ticket to the maintenance director to check the HVAC system. Staff reported that the additional requirement of submitting an HVAC request to the Technology Department, instead of directly to maintenance, can delay the resolution of persistent issues. The technology director should train the maintenance director to operate the remote HVAC system. The maintenance director should communicate to district staff the updated process to request assistance with thermostat and HVAC issues.

STAFF RESIDENCES

Bloomington ISD owns and maintains two staff residences: a modular home near Placedo Elementary School designated as housing for the superintendent and a home adjacent to the middle and high school campuses occupied by the behavior coordinator at the time of the review team's onsite visit.

Since its purchase by the district in April 2015, the superintendent's house has been a part of the compensation package offered to district superintendents. The district does not receive rent or utility payments from the staff occupying district-owned residences. Some staff indicated that maintenance was the responsibility of the current resident; however, district maintenance staff reported that they provide maintenance services and supplies for both district-owned residences.

District staff did not provide contracts for the staff residences to the review team, and Business Office staff indicated that they had not received these contracts, nor had an opportunity to review or evaluate them.

The district should ensure that staff residences are a transparent benefit of employment described in the relevant employment contracts, that requirements for potential staff occupants are clearly communicated, and that contracts are available to Business Office staff and regularly reviewed prior to renewal. The district should also evaluate the maintenance costs associated with upkeep and determine whether to continue with current agreements for staff residences.

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.

7. INFORMATION TECHNOLOGY MANAGEMENT

FINDINGS

- ◆ Bloomington ISD does not plan effectively for future technology needs and risks.
- ◆ Bloomington ISD lacks a formal acquisition process for technology hardware and software.
- ◆ Bloomington ISD lacks an effective process to update its website.

RECOMMENDATIONS

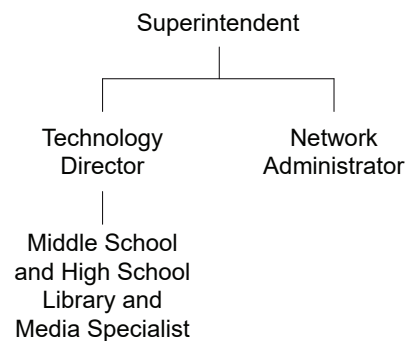
- ◆ **Recommendation 31: Develop a long-range technology plan, a cybersecurity plan, and a technology disaster-recovery plan, and update these plans regularly.**
- ◆ **Recommendation 32: Develop formal technology purchasing procedures and communicate them to district staff.**
- ◆ **Recommendation 33: Review the district website and establish a formal process to update its content.**

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 Information Management 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 part of the teaching and learning process (e.g., integration of technology in the classroom, virtual learning, and electronic instructional materials).

FIGURE 7-1
BLOOMINGTON ISD'S TECHNOLOGY DEPARTMENT
SCHOOL YEAR 2021-22



NOTE: The library and media specialist at the middle school and high school campus reports primarily to the middle school and high school principal but has responsibilities in the Technology Department.

SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

Instructional technology supports curriculum delivery, classroom instruction, and student learning.

The Bloomington Independent School District (ISD) Technology Department is responsible for setting up, maintaining, and tracking technology devices; maintaining the district's network; updating the district's website; training teachers on using hardware and instructional software; and responding to technology help-desk requests. The department is responsible for ensuring that the network and technology devices are functioning adequately at the district's five campuses and other administrative buildings.

The Technology Department consists of three staff. The technology director is the only technology staff that does not have responsibilities outside of the Technology Department. The technology director and the network administrator both report to the superintendent. The network administrator co-teaches two high-school-level courses in robotics and audiovisual production. The library and media specialist, who is officed at the middle school and high school campus, reports primarily to the middle-and-high-school principal. The technology director supervises the technology tasks performed by this position, such as responding to help-desk requests and setting up student instructional accounts. **Figure 7-1** shows the organization of the Technology Department.

**FIGURE 7–2
BLOOMINGTON ISD STUDENT TECHNOLOGY INVENTORY
SCHOOL YEAR 2021–22**

| CAMPUS | ENROLLMENT (1) | LAPTOP OR TABLET COMPUTERS | DEVICES PER STUDENT |
|-------------------------------|----------------|----------------------------|---------------------|
| Placedo Elementary School | 178 | 240 | 1.3 |
| Bloomington Elementary School | 252 | 300 | 1.2 |
| Bloomington Middle School | 211 | 470 | 2.2 |
| Bloomington High School | 218 | 330 | 1.5 |
| Crossroads Connect Academy | 26 | 30 | 1.2 |

NOTE: (1) Enrollment data is from the school year 2020–21 Texas Academic Performance Report membership count and refers to students who receive two or more hours of instruction per school day.

SOURCES: Texas Education Agency, Texas Academic Performance Report and School Report Card, school year 2020–21; Bloomington ISD, October 2021.

For school year 2020–21, Bloomington ISD budgeted \$362,326 for technology.

DETAILED FINDINGS

TECHNOLOGY PLANNING (REC. 31)

Bloomington ISD does not plan effectively for future technology needs and risks.

Technology planning helps districts prepare for future needs, expenses, and risks, such as cybersecurity threats or disaster events. Bloomington ISD lacks a long-range technology plan, a cybersecurity plan, and a technology disaster-recovery plan. Additionally, the district does not have a process to develop and update these plans.

LONG-RANGE TECHNOLOGY PLAN

Bloomington ISD does not have a long-range technology plan. A long-range plan covers all aspects of the use of technology in the district during a three-year to five-year period. The plan should include formalized goals, allocated funds, a device replacement plan, staff responsible for meeting goals, and progress measures. Although the district does not have a written plan, staff reported two technology goals for school year 2021–22, including achieving a one-to-one student-to-device ratio and improving the district’s network infrastructure. However, the school year 2020–21 district improvement plan shows that the district surpassed its student-device ratio goal during the first three months of school year 2020–21, which reveals that the district did not update this goal for school year 2021–22. **Figure 7–2** shows that the district has 485 more devices than students for school year 2021–22.

Figure 7–2 shows that the device-to-student ratio ranges from 1.2 at Bloomington Elementary School and Crossroads

Connect Academy to 2.2 at Bloomington Middle School. Staff said that the district exceeded its targeted device-to-student ratio to ensure that students will always have access to a device if a device is misplaced or needs repair.

According to staff, the district has begun making network improvements, including plans for a scalable network infrastructure that supports increased technology usage in the district. The Technology Department is using the results of a vulnerability assessment of the district’s network, conducted by regional Education Service Center III (Region 3) during May and June 2021, to secure identified weaknesses and guide network improvements. However, the district has not developed a timeline for the completion of the network upgrades or allocated funds from the district’s budget. The technology director stated that 85.0 percent of the cost of the network upgrades will be funded by E-Rate, a federal program that provides discounts on telecommunications to eligible districts based on the percentage of students eligible for free or reduced-price meals. However, the district must cover the remaining 15.0 percent, which staff reported is more than \$20,000. A district bond proposal that would have financed the remaining cost was rejected by voters at the November 2, 2021, election.

Although the district does not have a long-range technology plan, it follows an informal five-year device replacement plan developed by the technology director, who stated that some devices may be replaced sooner if needed. The district’s device inventory shows that the oldest devices were purchased in 2016, which is consistent with the plan’s five-year replacement schedule.

Effective device replacement plans include hardware purchasing standards for new devices to ensure they are compatible with district systems and have the

required memory and processors to operate the district's administrative and instructional applications. Bloomington ISD's Technology Department uses purchasing standards, such as processor speed and device memory size, to guide subsequent purchases.

Without a long-range technology plan, Bloomington ISD has not identified actionable steps to meet technology goals, nor does it have a process to update its goals after they have been achieved. Additionally, the district does not have an efficient way to allocate funds for the district's technology goals and future needs. The district's current technology staff have made progress in improving the district's network infrastructure and developing hardware purchasing standards. However, without a formalized long-range technology plan, unplanned staff turnover may hinder the Technology Department's efforts.

Granbury ISD developed a long-range technology plan, which is posted on the district's website. The 2018–23 plan includes updates for each school year. Each plan includes a needs assessment process and findings, technology goals with completion timelines, funding resources, and success measures. The plan also identifies staff responsible for performing tasks to meet goals. The technology director presents the technology plan for the following school year to the Granbury ISD Board of Trustees at the December board meeting.

CYBERSECURITY PLAN

A cybersecurity plan secures the district's equipment and data, determines cybersecurity risk, implements appropriate mitigation planning, and protects the district's network against a cyberattack and other cybersecurity incidents. Bloomington ISD board policy CQB (LOCAL) requires the district to develop a cybersecurity plan, designate a cybersecurity coordinator, and determine cybersecurity training needs. However, the district has not met any of these requirements. The Legislative Budget Board's School Performance Review Team visited the district in October 2021. At the time of the onsite visit, the superintendent reported that a cybersecurity plan was in development but had not been finalized.

Additionally, the district lacks procedures to assess cybersecurity risks regularly and implement preventive measures. Technology staff said that the district would benefit from establishing a checklist of equipment and network systems to guide regular inspections and assessments for vulnerabilities.

Without identifying and correcting vulnerabilities in a timely manner, the district is susceptible to data loss or theft that could shut down district operations or result in the unlawful attainment of staff and students' personal information.

The Texas Education Agency's (TEA) Texas Gateway website provides information, webinars, and tools related to cybersecurity. It also includes the Texas Cybersecurity Framework to help districts identify, protect, detect, and respond to vulnerabilities in their networks.

Fort Hancock ISD has a detailed cybersecurity plan that identifies the district's cybersecurity coordinator, contains an annual vulnerability assessment questionnaire, and documents steps the district has taken to protect its equipment and network. Additionally, the plan includes procedures for technology staff to initiate new user accounts, receive deliveries, deploy hardware and software, discard equipment properly, and prevent unauthorized access to the district's network.

TECHNOLOGY DISASTER-RECOVERY PLAN

The district does not have a technology disaster-recovery plan. This formal document contains detailed instructions on how to respond to unplanned incidents that affect a district's technology infrastructure, such as natural disasters, power outages, and other disruptive events. The plan contains strategies for effectively restoring hardware, applications, and data in case of disruption. During interviews, staff could not identify whether the technology director or the safety-and-security coordinator is responsible for developing the plan. Although the district backs up its data servers regularly to protect its network and data, it lacks a technology disaster-recovery plan containing actionable steps for recovering key systems and data quickly.

Significant data loss could force the district to shut down temporarily and could delay crucial operations, such as payroll. Effective districts have implemented plans to recover lost information and restore operations as quickly as possible.

Liberty County School District has a technology disaster-recovery plan that identifies the names and contact information of key district staff and includes contact information for external organizations that support the district. The plan also includes the district's server backup strategies, the responsibilities of the disaster-recovery team, and an assessment of potential disaster risk and the systems that could be affected.

River Road ISD's information technology disaster-recovery plan includes detailed steps and timelines for damage assessments, technology item recovery, and establishing district network operations at a remote location. The plan also specifies how technology department staff will work to minimize data loss during transition events.

Bloomington ISD should develop a long-range technology plan, a cybersecurity plan, and a technology disaster-recovery plan, and update these plans regularly.

The technology director should establish a process to develop a long-range technology plan. The process should include a technology needs assessment to guide the district's goals, with input from the superintendent, technology staff, district leadership staff, principals, teachers, students, and community stakeholders. The technology director should collaborate with the business manager to determine funding allocation needs to reach the department's goals. For each goal, the plan should include the level of priority, a timeline, how the district will evaluate progress, and staff responsible for meeting goal progress. The technology director also should formalize the district's hardware purchasing standards and device replacement plan and incorporate them into the long-range technology plan, including necessary funding. The district should evaluate its progress in meeting technology goals annually. The technology director should present the finalized long-range plan to the Bloomington ISD Board of Trustees for approval and update the board annually on the district's progress.

The technology director and the network administrator should collaborate on the following tasks:

- develop a cybersecurity plan that includes a network systems checklist to help identify and correct network vulnerabilities in a timely manner. The technology director and network administrator should use the information and tools available at TEA's Texas Gateway website to assist their efforts;
- develop a technology disaster-recovery plan containing detailed steps to assess network and equipment damage and restore district operations as soon as possible; and
- assess and update the plans annually or when the equipment and network systems are updated.

The superintendent and the safety-and-security coordinator should provide input on the cybersecurity plan and the technology disaster-recovery plan, as needed.

The district could implement this recommendation with existing resources.

TECHNOLOGY PURCHASES (REC. 32)

Bloomington ISD lacks a formal acquisition process for technology hardware and software.

The district has a purchasing requisition form that details how to input purchases in the district's purchasing system. However, the purchasing requisition form does not include procedures for requesting technology purchases or specify staff that should be included in the decision-making process. Without clear communication, the district's purchasing practices for technology hardware are inconsistent and vary by campus. During interviews, some campus and district leadership reported consulting the Technology Department before purchasing technology devices, such as laptop computers, smart boards, and printers, but could not confirm whether staff at other campuses followed this practice. One campus reported using the following steps for its technology purchase process:

- providing a needs assessment to the technology director;
- providing the Technology Department with three quotes for the desired purchase; and
- providing feedback to the Technology Department after the purchased technology items are in use.

The district's lack of procedures to guide technology purchases has resulted in an inefficient use of resources and additional work for the Technology Department. According to staff, the practice of providing a separate printer for each classroom is an example of an inefficient purchase. Installing and providing technical support for so many printers has increased the Technology Department's workload, and staff suggested that maintaining a higher and more manageable classroom-to-printer ratio would reduce the administrative burden on technology staff while meeting the needs of teachers.

Current inconsistencies in the purchasing process for campuses can cause confusion among staff. By contrast, formal technology purchasing procedures help ensure that staff responsible for making technology purchases receive necessary information about the requesting staff's technology needs to make informed and financially sound decisions. Although Bloomington ISD staff are addressing purchasing process issues that have resulted in inefficient

use of funds, the district's lack of formal procedures leave it vulnerable to unnecessary or redundant technology hardware purchases, particularly if efforts to streamline the purchasing process were interrupted by changes of district or departmental leadership.

Highland Park ISD has posted a procurement diagram for campus and department technology purchase requests on the technology services page of the district's website. The diagram specifies the departments that must approve purchase requests, including the Technology Department. The first step of the procurement diagram directs staff to consult the district's technology catalog of available hardware and software before requesting additional items.

Bloomington ISD should develop formal technology purchasing procedures and communicate them to district staff.

The technology director should collaborate with the superintendent and the business manager to develop formal purchasing procedures for technology devices. The procedures should include a needs assessment for district and campuswide purchases. Additionally, the technology director should collaborate with campus principals to develop a campus-level baseline for devices to guide future purchases. The baseline should include the types of devices used at the campuses and specify which are best suited for individual use and which could be shared among multiple staff. The business manager should add the technology purchasing procedures into the district's purchasing manual and work with the network administrator to publish them on the district's website on the Business Office page.

The district could implement this recommendation with existing resources.

WEBSITE (REC. 33)

Bloomington ISD lacks an effective process to update its website.

The network administrator is the primary staff responsible for updating the district website, but the middle-and-high-school principal and the student-and-community-engagement director also can revise specific web pages as needed. District and campus staff make oral or email requests to the network administrator to add or update items to the website. This process does not establish who is responsible for ensuring that website content is current and accurate.

Although the district is taking steps to improve its website, staff reported that further work is required, such as updating web pages and ensuring that hyperlinks are functional. A review of the website shows that the following pages have limited or outdated information:

- the superintendent web page posts a picture of the current superintendent but not his name or contact information;
- the staff directory web page lists only one staff member, and does not provide contact information nor specify the person's position;
- the College Knowledge hyperlinks for juniors and seniors, which provide college fair and college admissions test dates, are from school year 2016–17; and
- the website has duplicate accountability pages, which both post outdated Texas Academic Performance Reports.

State and federal laws require that each district post certain information on its website. The special programs director is responsible for checking what information needs to be posted and notifying the network administrator. Staff stated that the district has received notifications from Region 3 when special education information is missing on the website, but this support is not provided regularly. The review team's evaluation of the website shows that the district is in compliance with 24 of 33 required postings, or 72.7 percent. **Figure 7–3** shows the required postings that are missing from the district's website or do not comply with the requirements in law.

Although districts are responsible for posting statutorily required information on their websites, the Texas Association of School Business Officials and the Texas Association of School Boards have developed checklists, available on both organizations' websites, to help districts maintain these required postings.

District websites are an important channel for communicating information to parents, staff, and community stakeholders. When information is lacking or outdated, stakeholders have limited engagement with the district.

Bloomington ISD should review the district website and establish a formal process to update its content.

**FIGURE 7–3
BLOOMINGTON ISD’S MISSING OR INCOMPLETE REQUIRED WEBSITE POSTINGS
SCHOOL YEAR 2021–22**

| POSTING | STATUTE | REASON FOR NONCOMPLIANCE |
|---|---|---|
| Main office contact information | The Texas Local Government Code, §140.008(f)(2) | The district main web page does not have an email address posted. |
| Texas Academic Performance Report (TAPR) | The Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter BB, §61.1022(f) | The school year 2019–20 TAPR is not posted. |
| Campus report cards | The Texas Education Code, §39.362(1) | Not posted |
| Performance report for district | The Texas Education Code, §39.362(2) | Not posted |
| Accreditation status and most recent performance rating | The Texas Education Code, §39.362(3) | Not posted |
| PSAT/NMSQT and advanced placement tests (1) | The Texas Education Code, §29.916(c) | Current dates for the PSAT/NMSQT are not posted. Instructions for home-schooled students to sign up for advanced placement tests are not posted. |
| High school personal graduation plan | The Texas Education Code, §28.02121(b) | Texas Education Agency-developed information for students and parents about the high school personal graduation plan is not posted. |
| Number of times the district health advisory committee has met in the past year | The Texas Education Code, §28.004(k)(3)(A) | The most recent meeting information posted is from school year 2019–20. |
| Notice regarding ability to refuse entry or eject certain persons and the appeals process | The Texas Education Code, §37.105(g) | The district does not have the notice posted on its main page nor on the campus pages. |

NOTE: (1) PSAT=Preliminary SAT, formerly Scholastic Aptitude Test; NMSQT=National Merit Scholarships Qualifying Test.
SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

The network administrator should perform the following actions:

- form a test group to examine the website’s usability and use the feedback to improve the website. The test group should include administrators, teachers, students, and parents;
- collaborate with the student-and-community-engagement director to determine the staff responsible for ensuring that campus and department pages on the district website are updated, formalize the process, and communicate it to district staff; and
- collaborate with the special programs director to develop a required postings checklist that the network administrator will maintain and review annually to ensure that the district is in compliance with current law.

The technology director should review the website for the required postings annually to ensure the information is current.

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.

REPORTING STRUCTURE

The reporting structure for the Technology Department is not defined clearly. During interviews, some staff said that the network administrator reports to the superintendent,

while others said that the network administrator reports to the technology director. A defined reporting structure helps staff understand to whom they report and prevents unnecessary conflict within a department's organization. The superintendent should communicate the accurate reporting structure to all Technology Department staff.

STAFFING

Bloomington ISD does not have an effective method to determine a staffing level for the Technology Department. Before school year 2021–22, Bloomington ISD had one technology staff. A second staff was hired in May 2021 based on the former assistant superintendent's review of the technology director's responsibilities. As the use of technology continues to increase in the district, additional staff may be needed to support the district effectively. The superintendent and the technology director should establish a staffing formula for the Technology Department based on the number of campuses assisted, the number of devices the district has, and feedback from campus-level staff regarding the department's timeliness and effectiveness when providing support.

HELP-DESK SYSTEM

The Technology Department provides staff with immediate support for technology issues but does not track this support effectively. Bloomington ISD staff report technology hardware and software issues to the Technology Department through an online help-desk system. Technology staff use the system to monitor persistent issues with devices that could result in their replacement, and to assess whether particular staff could benefit from additional training. However, some requests for assistance with technology issues circumvent the help-desk system. For example, the Technology Department publishes instructions for frequently requested assistance on the district's website, which provides steps to resolve common technology issues. For some issues, such as login assistance or password resets, instructions direct staff to email or text the technology director for assistance but does not request staff to submit a help-desk system ticket.

Additionally, staff may request assistance outside of the help-desk system by contacting technology staff in person or by telephone or email. Technology Department staff then ask requesting staff to submit a help-desk system ticket after the issue is resolved for tracking purposes. However, technology staff reported that this method is ineffective, and some staff do not submit tickets. Resolving technology issues without a system ticket may result in inaccurate help-

desk data. The Technology Department should retrain staff to use the help-desk system when requesting support. Although some issues require immediate support, such as login assistance or resetting passwords for instructional programs, technology staff should set expectations for staff to submit help-desk tickets after the issue is resolved and follow up with staff as needed.

TECHNOLOGY ADVISORY COMMITTEE

Bloomington ISD does not have a Technology Advisory Committee that provides input in technology planning. According to staff, the district does not have a committee focused solely on technology, but the superintendent reported that technology is discussed during administrative team meetings. When district technology initiatives are discussed only in administrative meetings, the district is limiting the input and support it receives. The inclusion of teachers, parents, and community stakeholders in technology planning discussions can provide the district with expertise from individuals with differing academic and professional backgrounds and help build community engagement. The superintendent should consider establishing a Technology Advisory Committee consisting of Technology Department staff, administrative staff, teachers, parents, and community representatives.

INSTRUCTIONAL PROGRAM PURCHASE PROCESS

Bloomington ISD does not have written procedures for purchasing instructional software licenses. Several staff reported that the district currently has a surplus of instructional programs due to past inefficient purchasing processes. Some of the programs are duplicative, and others are unused because staff may not be aware that they are available. District staff recognize the inefficiency of past purchasing processes for instructional software licenses and have made progress toward improving purchasing processes. Currently, the network administrator and the library and media specialist track the district's instructional software licenses and provide input to campus staff regarding which programs to use based on their curriculum needs. This process informs district staff about the available programs and the instructional purpose each serves to prevent purchases of similar programs.

During school year 2021–22, the district purchased ClassLink, an application that connects all the district's instructional programs and makes them available through a single login. The application also tracks and analyzes how often students and staff use the instructional programs

available. Staff said that the application enables district and campus leaders to make informed decisions about the instructional programs being used and which to continue purchasing. The district also will use the data to determine whether license consolidation makes sense for the district. According to staff, the Technology Department, campus principals, and teachers will participate in the decision-making process for future instructional program purchases.

To ensure continuity of efficient purchasing procedures, the network administrator and the library and media specialist should collaborate with the superintendent, the business manager, and campus principals to develop formal purchasing procedures for instructional programs and develop written procedures to evaluate instructional program usage. Procedures should include feedback from principals and teachers regarding the programs that are used most frequently and that increase student academic achievement. The library and media specialist should coordinate with campus principals to develop an internal database of the instructional programs available to share with teachers and instructional support staff. The database should include general information regarding each program, such as which subjects and skills the program addresses and the grade level for which it is intended.

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.

8. FOOD SERVICE MANAGEMENT

ACCOMPLISHMENTS

- ◆ Bloomington ISD's Food Service Department increased reimbursements by implementing best practices for conducting direct certification in accordance with the federal Community Eligibility Provision.
- ◆ Bloomington ISD's Food Service Department effectively maximizes use of U.S. Department of Agriculture Foods to reduce food costs.

FINDINGS

- ◆ Bloomington ISD's Food Service Department lacks a formal orientation and ongoing training program for staff.
- ◆ Bloomington ISD's Food Service Department lacks processes for inventory management.
- ◆ Bloomington ISD's Food Service Department provides minimal nutrition education to students.

RECOMMENDATIONS

- ◆ **Recommendation 34: Develop a training program that includes orientation for new Food Service Department staff and continuing training for all department staff.**
- ◆ **Recommendation 35: Establish procedures for inventory management at each kitchen.**
- ◆ **Recommendation 36: Develop an annual plan for nutrition education and menu displays in campus cafeterias.**

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 (CNP), which include the School Breakfast and National School Lunch programs. The School Breakfast Program (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 following benefit categories: free, reduced-price, and paid. The National School Lunch Program (NSLP) serves low-cost or free lunches to students. Like the breakfast program, lunches must comply with federal nutrition guidelines and are reimbursable to school districts 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 service 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.

Bloomington Independent School District (ISD) uses the self-management model and participates in the SBP and the NSLP, collectively referred to as CNP. The district also receives donated foods through the U.S. Department of Agriculture (USDA) Foods Program.

Bloomington ISD offers free breakfast and lunch to all district students. During school year 2020–21, Bloomington ISD had 885 students enrolled in prekindergarten through grade 12. The district has three cafeterias and five campuses. Placedo Elementary School and Bloomington Elementary School each have their own cafeteria, and the middle school, high school, and Crossroads Connect Academy share a cafeteria. During school year 2020–21, Bloomington ISD budgeted \$551,172 for food service and planned to supplement the Food Service Department special revenue fund with \$18,672 from the district's general fund. The food service special revenue fund is used to account for financial activity involving the district's school nutrition program.

According to interviews, the department's budget typically balances to zero each school year. However, Bloomington

ISD’s Food Service Department recorded a financial loss during school year 2020–21. This loss was attributed to two factors: (1) a lower rate in meal participation as many students received remote instruction; and (2) increased food costs due to product shortages.

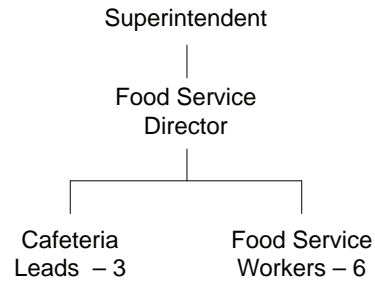
Bloomington ISD budgeted \$604,457 for food service in school year 2021–22. The Legislative Budget Board’s School Performance Review Team visited the district in October 2021. At the time of the onsite visit, the food service director reported that the Food Service Department is financially stable and generating sufficient revenue to meet expenditures for school year 2021–22. The district monitors the financial performance of the Food Service Department through monthly profit-and-loss reports submitted to the business manager and the superintendent. The business manager presents Food Service Department financial reports to the Board of Trustees.

Bloomington ISD’s Food Service Department has 10 staff, including a food service director, three cafeteria leads, and six food service workers. The Food Service Department also has three substitute food service workers to cover absences. **Figure 8–1** shows the district’s reporting structure for the Food Service Department. The food service director oversees the department and reports to the superintendent.

One key performance indicator of a food service department’s effectiveness is average daily participation (ADP). ADP is the average number of student reimbursable meals served in a CNP daily. For school year 2018–19, the last school year before the COVID-19 pandemic, Bloomington ISD’s ADP in the NSLP was 81.2 percent of enrolled students, and the ADP in the SBP was 53.2 percent. These meal participation rates are greater than the peer district averages of 67.2 percent lunch participation and 37.3 percent breakfast participation. Peer districts are districts similar in size and other characteristics to Bloomington ISD that are used for comparison purposes.

The district follows several best practices to ensure high participation in the CNP. The district limits competitive sales of foods or beverages to students on campuses that are not reimbursable meals served through the CNP. For example, students are not permitted to leave campus during lunch, and all vending machines are in the teachers’ lounges, where they are not available to students. In addition to limiting food choices that compete with the CNP, the food service director develops menus that use high-quality ingredients and are appealing to students and staff.

FIGURE 8–1
BLOOMINGTON ISD’S FOOD SERVICE DEPARTMENT ORGANIZATION
SCHOOL YEAR 2021–22



SOURCES: Legislative Budget Board School Performance Review Team; Bloomington ISD, October 2021.

According to interviews, district staff regularly purchase meals from the cafeterias and rate the food as high quality.

The district uses Nutrikids, a school nutrition management software, for planning menus and counting and claiming reimbursable meals. Students that have special dietary needs provide a physician’s note to the district nurse, who notifies the Food Service Department of any allergies or dietary issues. This information is recorded in the nutrition management system, and when the student enters her or his identification at the point of sale (POS), an onscreen alert informs Food Service staff about the student’s allergy.

DETAILED ACCOMPLISHMENTS

DIRECT CERTIFICATION

Bloomington ISD’s Food Service Department increased reimbursements by implementing best practices for conducting direct certification in accordance with the federal Community Eligibility Provision.

The Community Eligibility Provision (CEP) is a nonpricing meal service option that enables campuses and districts in areas that have high levels of poverty to serve breakfast and lunch at no cost to all enrolled students without collecting household applications. The USDA reimburses school districts that implement CEP according to the percentage of students the district identifies as categorically eligible for free meals based on their participation in qualifying programs, such as the Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, and Head Start. Migrant, homeless, and foster care students also are eligible categorically for free meals.

FIGURE 8–2
BLOOMINGTON ISD USAGE OF USDA FOODS ENTITLEMENT COMPARED TO PEER DISTRICTS
PROGRAM YEAR 2021

| DISTRICT | PROGRAM YEAR 2021 ENTITLEMENT | AMOUNT USED | UNFILLED REQUESTS (1) | REMAINING AMOUNT |
|------------------------|----------------------------------|--------------------|-----------------------|------------------|
| Bloomington ISD | \$42,365.04 | \$42,207.83 | \$134.56 | \$22.65 |
| Odem-Edroy ISD | \$59,044.92 | \$58,318.45 | \$0.00 | \$726.47 |
| Santa Gertrudis ISD | \$22,978.35 | \$20,238.13 | \$316.70 | \$3,056.92 |
| Skidmore-Tynan ISD | \$34,701.94 | \$29,605.84 | \$168.20 | \$4,927.90 |

NOTE: (1) Unfilled requests include U.S. Department of Agriculture (USDA) products that have not been allocated yet.
 SOURCES: Texas Department of Agriculture; USDA Food Reports, Program Year 2021.

Districts use a data matching system provided by TDA to develop a direct certification list and to identify the percentage of students eligible for free meals. This data matching system produces a district's identified student percentage (ISP) of directly certified students. If a district's ISP is 62.5 percent or more, the district receives the maximum reimbursement rate for each breakfast and lunch served. If the ISP is less than 62.5 percent, a portion of meals served are reimbursed at the maximum rate.

During school year 2015–16, Bloomington ISD began offering free meals to students at Placedo Elementary School through the CEP. When the current food service director began this position in 2017, the campus' ISP was 52.6 percent, and the district was not receiving the maximum reimbursement rate for meals served. The district did not have a robust process to ensure the accuracy of the ISP calculation or to maximize the number of students identified as categorically eligible through direct certification. The enrollment list used to calculate the ISP was not updated and included students that had left the district. As a result, the calculation for the ISP included an enrollment number that was several hundred greater than the district's actual enrollment, which artificially lowered the percentage of enrollment of categorically eligible students.

By correcting the enrollment list and establishing a process to update student files monthly to identify as many eligible students as possible, the Food Service Department increased the ISP at Placedo Elementary from 52.6 percent to 96.3 percent. The department also demonstrated that the ISP at every campus qualified Bloomington ISD to be eligible to implement CEP districtwide. During school year 2017–18, Bloomington

ISD began offering free meals to all students in the district and received the maximum reimbursement rate for all the meals. This implementation increased reimbursements by \$80,315 from school years 2016–17 to 2017–18.

USDA FOODS

Bloomington ISD's Food Service Department effectively maximizes use of USDA Foods to reduce food costs. USDA Foods, formerly referred to as commodities, are foods purchased by the USDA and provided to schools directly at minimal cost. These items consist of raw and processed foods, including frozen, fresh, canned, and dried products. Many of the foods are provided in bulk quantities, which often costs less than similar products a school could purchase on its own. Some districts have the capacity to process bulk foods into end products that are suitable for school meals, but most outsource this function to an approved commercial food processor.

Bloomington ISD's food service director plans cycle menus months in advance using the district's nutrition management software. The director sets a goal for the weekly cost per menu, and if the cost exceeds the goal, the director substitutes products from USDA Foods for higher-cost ingredients. The director also incorporates as many USDA Foods into menus as possible and changes menu offerings depending on the content of upcoming USDA Foods shipments. **Figure 8–2** shows a comparison of the remaining value of Bloomington ISD's USDA Foods entitlement compared to peer districts at the end of school year 2020–21. During that school year, Bloomington ISD used nearly all its USDA Foods entitlement, leaving a nominal remaining balance of less than \$23. In contrast, peer districts had unused balances ranging from \$726 to \$4,928.

DETAILED FINDINGS

ORIENTATION AND TRAINING (REC. 34)

Bloomington ISD's Food Service Department lacks a formal orientation and ongoing training program for staff.

The federal Healthy, Hunger-Free Kids Act of 2010 final rule, published in 2015, requires school nutrition program directors, managers, and staff to complete a minimum number of annual training hours. Food service directors must complete at least 12.0 hours of annual training in administrative practices, such as application, certification, and meal counting and claiming procedures. Cafeteria managers must complete 10.0 hours of annual training, and food service staff must complete 6.0 hours of annual training. Training topics for these continuing education requirements include health and safety standards and the identification of reimbursable meals at the point of service. During interviews, staff reported that Bloomington ISD requires every food service employee to attend professional development training to meet these minimum standards, typically during the summer, through regional Education Service Center III (Region 3).

Although the Food Service Department complies with the minimum federal requirements for training, the department does not have a formal orientation and training program to provide new staff an overview of the department's expectations and procedures. The federal continuing education requirements address topics related to federal program compliance, such as students' eligibility for free or reduced-price meals and the district's identification of reimbursable meals. However, these trainings do not address operational aspects of food service functions or local procedures such as food ordering, inventory management, meal preparation, and meal service.

Cafeteria leads are expected to train newly hired staff on all aspects of food preparation and service. Staff do not receive any written department procedures, and training occurs through observation and hands-on experience completing tasks. The department does not provide cafeteria leads with materials to use in their instructions for new hires to ensure that onsite trainings are consistent, comprehensive, and accurate. Each cafeteria lead determines how to perform the training, and the Food Service Department does not evaluate whether the training has covered all necessary areas. Although on-the-job training is a practical approach to acquiring the skills necessary to work in the kitchens, the lack of a standardized training program based on documented

procedures increases the risk of variability in how cafeteria leads teach procedures at various kitchens.

While onsite, the review team observed several examples of inconsistent operational practices among the kitchens. For example, at one kitchen, the cafeteria lead performs all administrative duties, such as completing food production records, ordering food and supplies, and receiving deliveries. In contrast, at another kitchen, these duties are divided among all staff; the cafeteria lead is responsible for lunch production records and ordering meat and paper products, and two food service staff are responsible for breakfast production records and ordering vegetables, breakfast foods, and desserts. This division of duties is inconsistent with the roles and responsibilities for these positions as described by the food service director.

The review team also observed instances of best practices performed in one kitchen that were not performed in others. For example, observations revealed that staff at one kitchen received deliveries by checking the items delivered against the invoice to confirm the receipt of all items ordered, which helps ensure that the district receives the products for which it has paid. However, this best practice did not occur at another kitchen, where the review team observed that staff do not document the receipt of invoiced items. Instead, the drivers leave the delivery items in the kitchen, and food service staff rely on the drivers to return if they discover items left on the truck by accident. Staff at this kitchen explained that they do not check the invoices because deliveries usually occur during the breakfast rush. This process does not provide assurance that the deliveries are complete and invoices are accurate. The inconsistencies in receiving goods at campuses indicate a need for standardized training based on documented procedures. In the absence of a standardized process for meal production, cafeteria leads in each kitchen have developed their own processes for tracking participation and planning the number of meals to serve each day. Some of these processes yield more accurate results than others. In one kitchen, the cafeteria lead developed a calendar system to record and track the number of meals served per menu and uses this data to determine how many meals to produce daily. Another cafeteria lead uses daily meal production records to estimate participation, which is less accurate. The written instructions for these processes were developed individually by the cafeteria leads on their own initiative, without any guidance from the department.

In addition to inconsistencies in operations, the lack of a formal, documented training program and written

procedures places greater reliance on the institutional knowledge of current staff to operate Bloomington ISD's Food Service Department successfully. At the time of the onsite visit, each cafeteria lead had decades of experience working in the department and felt comfortable overseeing operations. However, relying solely on the leads' experience and expertise to train new staff places the department at greater risk of inefficiency in the event these staff separate from the district.

Preparing and serving school meals is challenging for several reasons. The task of preparing many meals on a short schedule requires specialized training. In addition, school kitchens contain equipment that is unfamiliar to most new hires, and its misuse can lead to accidents. Because the Food Service Department operates USDA programs, the department must comply with all state and federal regulations, which are unfamiliar to most new employees.

In *Orientation to School Nutrition Management*, 2018, the Institute of Child Nutrition (ICN), a federally funded center dedicated to applied research, education and training, and technical assistance for CNPs, states the following guidelines regarding training and professional development:

Food service directors have the responsibility of continuous learning for themselves and their staff. They should engage in continuing education and participate in professional organizations to expand their knowledge. Directors must assess employee skills and needs and use the results to develop and implement personal development plans and training programs. Training and professional development is a continuous and never-ending process.

The School Nutrition Association's (SNA) 2019 resource *Keys to Excellence: Standards of Practice for Nutrition Integrity* identifies the following indicators for orientation and training best practices for school nutrition staff:

- training and staff development opportunities are provided based on staff needs, regulations, program and nutrition trends, local issues, and certification requirements;
- school nutrition staff are included in training opportunities offered to other district staff as appropriate;
- as part of their orientation process, school nutrition staff and nutrition educators receive basic sanitation training before starting work in the kitchens;

- opportunities to attend educational programs and professional meetings are encouraged, and costs are covered by the school nutrition program when possible;
- various group and individual training methods are used, such as in-classroom trainings, interactive online classes, webinars, videos of conference sessions, and *School Nutrition* magazine "To Your Credit" articles;
- an orientation program is developed that introduces new school nutrition staff to the program's mission, requirements, and goals;
- school nutrition staff are trained on ethics and ethical best practices in school nutrition;
- a system for evaluating the effectiveness of the training program is developed and modified as needed; and
- a system for mentoring or management training is used for succession planning.

Bloomington ISD should develop a training program that includes orientation for new Food Service Department staff and continuing training for all department staff.

The food service director should implement the following practices;

- develop an orientation program with a training component that includes topics that new staff should be familiar with before entering a school kitchen for onsite training, such as department vision, mission, and goals; meal patterns, components, portions, and delivery; sanitation and food safety; kitchen equipment; and ordering and receiving food and supplies;
- develop a checklist of topics that cafeteria leads should cover in their onsite training of new staff;
- train cafeteria leads on how to present the training and provide any necessary resources to use as reference; and
- establish periodic department meetings for ongoing training on topics such as meal preparation and cooking skills, portion sizes, food safety, and changes to program regulations and department procedures.

The district could implement this recommendation within existing resources.

INVENTORY MANAGEMENT (REC. 35)

Bloomington ISD's Food Service Department lacks processes for inventory management.

The Food Service Department receives weekly orders of food and supplies purchased through the Region 3 and Region 20 purchasing cooperatives. Food service staff are responsible for determining the number of products to order. To determine the quantity of items needed, staff review the shopping list attached to the upcoming week's menu, and then follow an informal process of comparing what is needed to the perceived quantities available in the storeroom, refrigerators, and freezers. The Food Service Department has not established any formal procedures for determining the timing and quantity of product orders, nor has it set periodic automatic replenishment (PAR) levels. PAR levels are minimum inventory requirements set for items. When quantities approach the minimum levels, staff reorder those items. Instead, the department relies on the experience of food service staff to ensure that accurate quantities are ordered to meet menu requirements.

When grocery orders arrive, any food service staff can sign off on the receipt of the items and staff write the date on each product before placing items in the storeroom. Staff, also practice a method of first in, first out when using stock to ensure that older items are used first. This method is a best practice for preventing spoilage; however, the department lacks processes to detect waste, theft, or other irregularities. For example, the review team observed inconsistent documentation of deliveries at different kitchens, as described in the finding on the district's lack of a formal training program.

Additionally, the review team observed that staff at two campuses store food products in unlocked areas, and any staff can pull stock from inventory. Kitchen staff do not document which items are pulled from inventory or by whom, and the department does not physically count the inventory periodically. Without comparing goods used to an inventory, it is impossible to determine whether food or supplies were missing or stolen.

According to the *Inventory Management Reference Guide*, a 2012 publication by the ICN under its former name, the National Food Service Management Institute, food service department inventories often require a significant percentage of operational revenue. An important aspect to controlling food cost is to maintain inventory levels high enough to produce the optimal amount of menu items but low enough

to avoid keeping excess product in storage. If the count of stock items does not match servings prepared, it could indicate overproduction or other potential problems, including theft. Excess inventory increases the risk of waste due to spoilage, theft, or overproduction. When too many products are kept in inventory, more storage space is required, and waste is more difficult to control. Conversely, insufficient inventory can cause insufficient production of menu items, leading to customer disappointment and potential violation of program regulations.

Establishing district goals for inventory metrics can help site managers better manage inventory. Setting PAR levels for items served daily, such as milk, and common ingredients, such as flour and spices, is a best practice for maintaining a minimum amount of inventory to meet unpredicted demand, while decreasing the risk that kitchens will deplete food stocks. To avoid excess inventory, another best practice is to determine an appropriate number of days to maintain available inventory, which is calculated by dividing the value of the ending inventory by the average daily food cost. According to the *Inventory Management Reference Guide*, it is ideal to stock no more than seven to 10 days of inventory for kitchens that receive weekly deliveries for most products.

Bloomington ISD's Food Service Department should establish procedures for inventory management at each kitchen.

The food service director should perform the following tasks:

- consider establishing PAR levels to serve as the expected minimum inventory to meet customer needs;
- develop an inventory log and train staff to document the removal of stock from inventory;
- require monthly physical inventories of products in the storerooms and in the freezers.
- establish and document in written procedures the roles and responsibilities for staff assessing inventories, as described in the subsequent steps. Ensure that staff responsible for conducting physical inventories have no direct responsibility for the receipt of products subject to the inventory count;
- prepare blank inventory worksheets with the following category headings for inventory counts: pack quantity, opened package quantity, location, stock number, and description; and

- train staff to perform the following steps when taking inventory:
 - * leave product in cases and consolidate product (cans and boxes) into full cases or containers as much as possible;
 - * make sure product labels are showing; before counting, rearrange and position cases and containers on shelves or pallets in each location to be counted;
 - * plan for proper outerwear for taking the inventory count in the freezer; and
 - * count inventoried items using two staff, one who counts the items and one who records the count. After the count for each item is recorded, the recorder must show the counter the number entered, which the counter verifies.

The district could implement this recommendation within existing resources.

NUTRITION EDUCATION AND PROMOTION (REC. 36)

Bloomington ISD's Food Service Department provides minimal nutrition education to students.

The federal Healthy, Hunger-free Kids Act of 2010 requires each school district that participates in the NSLP or other federal CNP to establish a local school wellness policy for all campuses. The wellness policy must include specific goals for nutrition promotion and education, physical activity, and other campus-based activities that promote student wellness. The district's school health advisory council (SHAC) developed Bloomington ISD's wellness policy, which establishes the following goals for nutrition promotion:

- the school district will engage students, parents, teachers, food service professionals, health professionals, and community stakeholders in developing, implementing, monitoring, and reviewing districtwide nutrition and physical activity policies; and
- schools will provide nutrition education and physical education to foster lifelong habits of healthy eating and physical activity and will establish connections between health education and school meal programs and with related community services.

Although the district has established a wellness policy, opportunities exist to improve nutrition education and promotion in the district. The district's website provides no nutrition information and very limited menu information. At the time of the review team's onsite visit, the district had posted one menu online for the secondary schools' lunch menu, which did not contain any information about the nutritional contents of the meals. In the cafeterias, menus are not posted physically near the serving lines. The review team observed menus posted in areas that were not clearly visible to students. For example, at Bloomington Elementary School, breakfast and lunch menus are posted on a door at a height that is inaccessible to young students. At the secondary schools' cafeteria, menus were posted in the dining area instead of near the serving line. The review team observed that campus dining rooms have bulletin boards and wall space that could display menus and nutrition information, but almost no nutritional content or educational materials were posted in these areas.

The SNA's 2019 resource *Keys to Excellence: Standards of Practice for Nutrition Integrity* identifies as a best practice that effective school nutrition programs encourage and support nutrition education. The review team found that Bloomington ISD meets two of the seven indicators provided by SNA for this best practice, as shown in **Figure 8-3**.

Team Nutrition is an initiative of the USDA Food and Nutrition Service to support CNP through training and technical assistance for nutrition education for students. Schools that participate in the NSLP can enroll in the Team Nutrition School program, which provides the campus access to nutrition education materials and opportunities to collaborate with other Team Nutrition Schools. Although all Bloomington ISD campuses are eligible to join this program, none are registered as Team Nutrition Schools through the USDA.

Several school nutrition trade organizations and programs provide free nutrition education posters and other materials to school districts, including:

- USDA's My Plate, which includes graphics, materials for educators such as lesson plans, and other printable materials that can be downloaded at no cost;
- the ICN, which provides professionals working in child nutrition with training materials on the topic of nutrition education; and

**FIGURE 8–3
ANALYSIS OF NUTRITION EDUCATION BEST PRACTICE INDICATORS IN BLOOMINGTON ISD
OCTOBER 2021**

| INDICATOR DESCRIPTION | PRESENT IN BLOOMINGTON ISD |
|---|----------------------------|
| Current, age-appropriate, science-based nutrition and nutrition education materials are recommended and promoted. | No |
| Nutrition education materials such as posters, displays, and bulletin boards appear on campus. | No |
| Meals and other foods and beverages served in the school cafeteria reinforce the Dietary Guidelines for Americans and other accurate nutrition messages. | Yes |
| Nutrition messages are shared with parents using available media resources such as printed menus and newsletters, social media, school websites, school television stations, parent meetings, and school board presentations. | No |
| School nutrition staff serve as a resource for nutrition activities through kitchen tours, food demonstrations, tasting parties, and/or participating in classroom nutrition education activities. | No |
| School nutrition staff prompt students to choose fruits and vegetables. | Yes |
| Nutrition education programs promoted by the school nutrition program are evaluated for effectiveness. | No |
| <p>SOURCES: Legislative Budget Board School Performance Review Team; School Nutrition Association, <i>Keys to Excellence: Standards of Practice for Nutrition Integrity</i>, 2019; Bloomington ISD, October 2021.</p> | |

- the SNA, the Texas Association for School Nutrition, and TDA’s Food and Nutrition program, which provide nutrition education training materials for staff working in child nutrition.

Bloomington ISD’s Food Service Department should develop an annual plan for nutrition education and menu displays in campus cafeterias. All campuses should enroll in USDA’s Team Nutrition School program to receive free educational materials throughout the school year. The food service director should complete the following actions:

- collaborate with SHAC members to develop an annual nutrition education plan;
- enroll all campuses in the Team Nutrition School program and require all cafeterias to use materials available from this program;
- include nutrition content information on breakfast and lunch menus, and post this information on the district’s website; and
- designate locations such as menu boards or stanchions to post menus for students, then require food service staff to display monthly, weekly, or daily menus.

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.

STAFFING PLAN

The Food Service Department does not have a formalized staffing plan based on factors such as participation, facilities, and services provided. Although the food service director is aware of industry staffing standards, staff are not assigned to kitchens based on a staffing formula. The district’s approach to staffing the kitchens is to maintain the same number of staff as in previous years. In addition, campus administrators have made staffing changes in the food service department that were neither based on a staffing formula nor conducted in coordination with the food service director, resulting in an understaffed kitchen. The department should consider developing a formal staffing plan to guide the effective and efficient assignment of staff to cafeterias and to plan for vacancies.

CASH MANAGEMENT

The Food Service Department has not established appropriate segregation of duties for handling cash. The secondary schools cafeteria sells items a la carte and collects

cash. According to interviews, cash sales total approximately \$500 per week. The food service director is the designated staff involved in counting, reconciling, and depositing cash at the bank, and the director makes these deposits weekly. Although the food service director provides a copy of the deposit slip and a reconciliation report from the POS to the business manager, this practice alone does not support best practices to prevent fraud, waste, and abuse. The Food Service Department should develop procedures to separate key cash management duties and to require daily deposits. One approach could be for cashiers to count the cash in the drawer after each meal service, and for the cafeteria lead to reconcile the counts with the data in the POS software at the end of each day's services. The cafeteria lead then would present the cash and the reconciliation report to the food service director to deposit in the bank.

BREAKFAST IN THE CLASSROOM

Bloomington ISD has not implemented breakfast in the classroom, a best practice service model to maximize participation in the SBP. The district's meal participation rate is greater than peer district, region, and state averages, and staff report that revenues from meal reimbursements are adequate to meet expenditures. The food service director acknowledged that providing breakfast in the classroom would increase breakfast participation and meal reimbursements but determined that implementing that service model was unnecessary because of the healthy condition of current program revenues.

Serving breakfast in the classroom provides numerous benefits apart from increasing program revenues. According to the nonprofit organization Food Action and Research Center, students who participate in school breakfast exhibit improved academic performance, exhibit fewer behavioral and psychological issues, and record lower rates of absence and tardiness. However, barriers such as transportation logistics decrease participation in breakfast served in the cafeteria before school starts. Making breakfast part of the school day by serving breakfast in the classroom is cost-effective, increases access to breakfast, and is associated with fewer disciplinary office referrals. Bloomington ISD should consider implementing a breakfast service model such as breakfast in the classroom or grab-and-go breakfast to help ensure that breakfast is incorporated into students' morning schedules.

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.

