LEGISLATIVE BUDGET BOARD

Brownfield Independent School District

Management and Performance Review

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Management and Performance Review

LEGISLATIVE BUDGET BOARD

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July 30, 2020

Mr. Chris Smith
Superintendent
Brownfield Independent School District

Dear Mr. Smith:

The attached report reviews the management and performance of Brownfield Independent School District's (ISD) educational, financial, and operational functions.
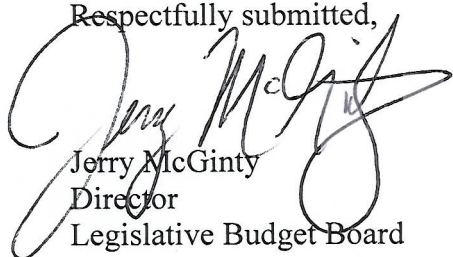
The report's recommendations will help Brownfield ISD improve its overall performance as it provides services to students, staff, and community members. The report also highlights model practices and programs being provided by Brownfield ISD.

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

The Legislative Budget Board engaged Broaddus and Associates, Lloyd Smith & Associates, Prismatic Services, Inc., Ressel & Associates, LLC, and Resources for Learning, LLC to assist LBB staff to conduct and produce this review.

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

Respectfully submitted,

Jerry McGinty
Director
Legislative Budget Board

/mmc

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cc: Geoff Cooper   Will Hawkins
        Randy Anthony   Yvonne Rocha
        Cody Churchwell   Tim Swaringen
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BROWNFIELD INDEPENDENT SCHOOL DISTRICT EXECUTIVE SUMMARY

The Legislative Budget Board's (LBB) School Performance Review Team conducted an onsite visit of the Brownfield Independent School District (ISD) in December 2019. LBB staff completed the analysis in May 2020.

The review team identified 50 significant findings and recommendations in three 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.

LBB staff project that Brownfield ISD could save an average of $351,000 annually by implementing the recommendations. Estimated five-year savings total more than $1.7 million, including onetime costs of approximately $25,000.

FINDINGS AND RECOMMENDATIONS

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

(1) plan and budget;

(2) evaluate and develop procedures; and

(3) analyze staffing and implement training.

PLAN AND BUDGET

Brownfield ISD does not require departments to produce short-term and long-term plans, to base budgets on those plans, or to analyze data to assess performance. The district's method and process for budget preparation impede its ability to manage efficient spending. Several departments, including Food Services, Facilities, Maintenance and Transportation, and Technology, struggle in this area. Each department manages its financial oversight differently, resulting in inconsistencies in the district's operations.

The review team found multiple opportunities for the district to improve its method and structure of planning and budgeting.

Brownfield ISD's budget-planning process does not connect the budget to the district's goals and objectives and does not include strategic planning for the timing and spending of state and federal grants and allotments. Instead of connecting budgets to the goals in the district improvement plan and the campus improvement plans, Brownfield ISD builds operating budgets based on previous years' activities. Similarly, the district does not connect grant applications to district goals nor involve principals and department managers in planning for the expenditure of federal funding. The district could gain more than $317,000 annually through improved grants planning and administration and maximizing the use of available federal funding.

The district's Food Services Department has no process to evaluate its financial status regularly, nor to ensure that the program is operating efficiently. Neither the Business Office nor the Food Services Department consistently monitors the monthly revenue and expenditures, either at the department level or by cafeteria, which risks noncompliance with state and federal requirements. Setting annual financial and operational goals and configuring financial reports to monitor the Food Services Department will improve efficiency in campus cafeterias.

Brownfield ISD does not plan for facilities management and future facilities needs adequately and does not engage in key elements of long-term facilities planning. The Facilities Department does not conduct regular audits and inspections of facilities, and the district lacks short-term and long-term goals for facilities beyond the completion of the projects scheduled with the $40.0 million bond package approved by voters in May 2019. Adopting a facilities master plan would provide the district a tool to schedule and budget funds to maintain and enhance its facilities. A facilities master plan would guide the district in directing resources to the highest priorities and enable the district to schedule and budget funds to maintain and enhance its facilities.

The district's Transportation Department has opportunities to improve its planning and budgeting. Brownfield ISD does not assess its bus routes regularly for efficiency improvements and lacks a process to determine the proper fleet size and types of vehicles to best serve the district. Bus routes affect the overall spending for a district's transportation operations by providing the basis for the number of driver positions, the

number of vehicle maintenance staff, and the number of new buses that the district may need. A long-term comprehensive plan is a tool districts can use to provide safe, reliable, and fiscally responsible transportation. An analysis of the fleet and the bus routing process along with a comprehensive bus replacement plan would help staff to manage the Transportation Department better.

Brownfield ISD's Technology Department does not have an efficient long-range planning or budgeting process. Lacking a clear plan and associated funding for technology results in inefficient spending on equipment and unused devices. The district should implement a well-written technology plan to provide a framework for effective planning and decision making and support district goals.

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

- develop a proactive budget-planning approach to connect spending with identified needs and goals;

- designate the food services director to oversee the financial monitoring of the Food Services Department, and utilize sound financial reports to enhance financial monitoring of operations and promote financial stability in the Child Nutrition Program;

- establish a five-year facilities master plan and update the plan annually;

- analyze its fleet operations and adopt a bus replacement plan;

- review its bus routing process to optimize its fleet; and

- prepare and maintain a current technology plan aligned with identified district needs and goals.

EVALUATE AND DEVELOP PROCEDURES

Brownfield ISD lacks a standardized, districtwide process to document and communicate operational procedures. The district does not have formal, detailed operational procedures or operating manuals for the Business Office and Security Department or for educational service delivery and community involvement. The lack of a comprehensive administrative procedures manual or individual department manuals results in inconsistent, inefficient, and possibly noncompliant district operations. Additionally, the lack of written procedures places the district at risk for the loss of institutional knowledge following staff turnover.

The review team found multiple opportunities for the district to evaluate and develop procedures.

The Business Office lacks clarity regarding the district's fund balance policy. The district's online policy manual does not include a fund balance policy, and the chief financial officer was not aware of a policy. However, the district's Annual Financial Report states that the board has adopted a minimum fund balance policy for the general fund. Furthermore, the audited financial reports and information from district staff interviews indicate conflicting understandings of the district's goals for its financial position. Adopting a fund balance policy would provide the board a benchmark to evaluate the effects of budget amendments on the district's fund balance.

Another financial concern is that Brownfield ISD lacks procedures to document investment management responsibilities and ensure the appropriate segregation of cash management duties from investment management duties. Separating the investment transaction authority from accounting and record keeping would provide the district a critical internal control for the prevention of fraud, waste, and abuse.

Brownfield ISD lacks a clearly defined contract management function to ensure adequate administration and oversight of district contracts. The district has a decentralized contract management function, and board policy and district procedures are unclear regarding several key aspects of contract administration. Many district and campus staff and the board president sign contracts that bind the district to defined terms and conditions. Adopting guidelines for who can sign contracts would reduce the district's risk of staff engaging in legally binding contracts without the knowledge and approval of the Business Office.

Brownfield ISD lacks adequate guidelines for the use of district credit cards and does not follow or enforce existing guidelines consistently. Adopting and enforcing adequate guidelines for the use of credit cards would provide the district an opportunity to detect the abuse or mismanagement of district funds.

Managing the tagging, inventory, and disposal of assets is a challenge for the district. The Business Office Procedures Manual states that the procedures are intended to protect the district's assets, but the manual contains no guidelines for how to document or inventory capital assets. Brownfield ISD also lacks procedures for asset disposal. In the absence of annual inventories, the district cannot hold campuses, departments,

or staff accountable for safeguarding district property. Documenting the district's fixed asset management procedures would clarify the expectation of accountability for all staff.

The Business Office Procedures Manual lacks key elements to ensure consistency, accountability, and compliance with state and federal regulations. The district's lack of adequate procedures results in a risk of lost revenues and noncompliance with some state and federal guidelines. The business manager should add procedures to mitigate risk for asset management, budget development, administration for grants, cash handling, compensation, and records retention.

Brownfield ISD has not established a safety and security committee as required by the Texas Education Code. Additionally, the district does not have a current multihazard emergency operations plan and lacks a process to monitor and implement emergency operations procedures. Addressing key safety and security elements in procedures would promote operational consistency throughout the district.

In the area of educational service delivery, Brownfield ISD does not have a systematic, defined program of curriculum development, assessment, implementation, and evaluation. Developing a systemic curriculum management plan that makes expectations clear to all stakeholders, differentiates instructional delivery to students with diverse needs, and establishes procedures for the implementation and monitoring of adopted curriculum would help the district to meet students' instructional needs. District leadership should develop a curriculum management plan, set clear expectations for instructional staff to use the plan, and monitor its implementation to maximize instruction and improve student outcomes.

Communicating effectively with the community is a challenge for the district. Although the superintendent and the district leadership team have identified community engagement as a priority, the district does not have a coordinated outreach plan that guides community involvement. Streamlining communication would provide clarity for all stakeholders.

The following recommendations would assist the district's evaluation and development of procedures:

- develop and implement comprehensive written procedures for each of the district's functional areas;

- develop a policy to identify the level of fund balance the district will maintain in the general fund and evaluate the use of committed and assigned funds;

- establish effective internal controls for investment management;

- implement controls to improve contract management functions;

- strengthen the district's charge card guidelines to include more detailed procedures and establish internal controls to comply with the guidelines;

- develop and implement controls to manage district assets efficiently;

- develop comprehensive procedures to guide the daily functions of the Business Office and ensure that financial management activities adhere to best practices;

- form a safety and security committee to formalize safety and security processes in the district;

- implement and update the district's multihazard emergency operations plan;

- develop a curriculum management plan that supports the district's needs and monitor the plan's implementation; and

- develop an effective community outreach plan that promotes a common vision for the district, addresses the comprehensive needs of all stakeholders, and facilitates communication with community representatives in targeted, intentional, and coordinated ways.

ANALYZE STAFFING AND IMPLEMENT TRAINING

In the areas of educational service delivery and human resources, and in the Food Services, Technology, and Transportation departments, Brownfield ISD has not identified an allocation formula to determine optimal staffing levels. The district also has not planned or formalized training goals and implementation. Appropriate staffing and training would result in operational efficiencies and positive student outcomes.

The review team found multiple opportunities for the district to analyze staffing and implement training.

In the area of educational service delivery, Brownfield ISD does not address students' social and emotional needs adequately. In addition to performing group, individual, and educational counseling, the district's counselors have multiple other duties. Counselors reported that other

responsibilities often make it difficult to perform their counseling function. The district does not have a job description for the Social Emotional Learning counselor and has not established metrics that would determine success for the position. In addition to counselors, the district's licensed specialist in school psychology (LSSP) works exclusively with the Special Education Department to assess students that may need certain accommodations. Although the LSSP is trained to work with all students, the position does not work with students at risk for self-harm and does not train teachers regarding student behavior management or suicide prevention. If the district reassigned counselors' administrative responsibilities, the counselors would have more time to provide individual counseling and crisis counseling for students.

Brownfield ISD has not evaluated teaching and support staffing levels and assignments to determine whether services are sufficient to meet student needs. Without determining the number of staff needed to perform specific tasks, the district risks employing excess staff in some areas and having insufficient funds to employ staff in other key positions. This practice could burden some staff with additional responsibilities unrelated to their primary focus. Adopting an accurate staffing allocation model based on best practices would help the district determine equitable staffing levels necessary to promote student success.

Brownfield ISD's human resources (HR) function is dispersed among various positions and lacks clear documentation, which limits staff's efficiency and ability to access critical information and support. The district does not have a dedicated Human Resources Department. The human resources structure and limited documentation restrict the effectiveness of the employee grievance process, affect worker's compensation claims, result in inconsistencies in HR procedures among food services staff and other hourly staff, and increase the risk of noncompliance with federal and state HR regulations. Streamlining the HR function would maximize this organizational unit's effectiveness.

The district does not maintain and monitor documentation of mandatory staff trainings effectively. Individual department managers and campus principals conduct and track staff training. Department managers reported that no other district staff check the records that they maintain for their respective staff, and they are not required to submit any records to the district's administrative office. Effective oversight of mandatory staff training would help ensure that staff comply with all certifications and continuing education

hours and receive adequate training to conduct their work safely and effectively.

Brownfield ISD lacks sufficient guidelines for stipends and allowances and does not differentiate effectively pay based on experience. Stipends and allowances are a significant part of the district's salary expenses. During school year 2018–19, stipends and allowances totaled more than $492,000 and accounted for 4.5 percent of total salary expenditures. The district's compensation manual provides little guidance related to extra-duty pay, including stipends and allowances. Implementing an awarding practice with clear expectations for compensating staff for extra duties and criteria for selection would result in a more equitable and transparent compensation system.

The Food Services Department has an inefficient staffing model for meal production and service. Compared to industry standards, the district has low productivity in several of its kitchens, which may result from the district's eight-hour day staffing model. Brownfield ISD's food services operations include excess labor at breakfast in most cafeterias and labor shortages during food preparation and service times at lunch. Effectively managing the number of staff, including having an adequate pool of available substitutes, would promote stability in the Food Services Department.

The lack of clearly defined teacher expectations for instructional technology results in suboptimal technology integration into classroom instruction. The district does not have a formal plan for teachers to receive ongoing professional development for instructional technology, and district leadership acknowledged that technology is not being used to its full capacity in classrooms. Setting expectations for how teachers should use technology in the classroom would increase coordination and technology integration into classroom instruction.

Brownfield ISD provides limited professional development for staff in the Technology Department. The department has not established minimum training levels for each position or developed programs to align professional development with the position's responsibilities and needed skills. Adequately training staff to assist the district would help ensure that help desk tickets are addressed in a timely manner and that district and campus staff perform their duties effectively.

Brownfield ISD's Transportation Department has insufficient vehicle mechanic staffing for the district's fleet size and does not have any substitute drivers. The district has one qualified mechanic to support the fleet, a challenge

recognized by the director of maintenance and transportation and the superintendent. The district has no plan to recruit or develop qualified technicians. Adequate mechanical support is critical to the functionality of school district fleet operations. Hiring a sufficient number of knowledgeable fleet mechanics would improve the district's ability to transport students safely, on time, and in a manner that meets the community's expectations.

The following recommendations would assist the district's staffing analysis and training implementation:

- clarify the roles of counselors, teachers, and other staff to provide better suicide prevention and intervention and social and emotional learning services to students;

- develop a campus staffing allocation model based on best practices and guidelines that meet student needs;

- define, document, and communicate all human resources roles and responsibilities;

- develop a mandatory staff training system and assign central oversight of this training to the assistant superintendent;

- evaluate the staff compensation system and develop detailed documentation to administer the compensation system and extra-duty pay;

- develop and implement a staffing formula based on industry standards and individual operational needs for the Food Services Department and establish a substitute pool to cover staff absences;

- adopt clear expectations for teachers regarding technology competence that meet statutory requirements;

- determine an optimum skill level for technology staff and provide necessary professional development to reach an efficient staff performance level; and

- evaluate the Transportation Department's staffing needs and ensure that new staff receive training.

ACCOMPLISHMENTS

During the course of its review, the LBB School Performance Review team has identified noteworthy accomplishments resulting from the district's best practices. The following accomplishments are discussed at greater length in subsequent chapters.

WEEKLY FOOD PROGRAM

Brownfield ISD collaborates with a local community organization to provide backpacks containing food, snacks, and other items for more than 200 students in need to take home every week through the Pak Pals program. This program helps the community address food insecurity at home in some families. Community organizations collect donations, and campus staff collaborate with the program's coordinator to pack and distribute the bags to students weekly. The program does not require an application or qualification process, and any student may receive a backpack.

RECRUITMENT

Brownfield ISD has implemented policies and procedures to improve teacher recruitment. The board delegated final authority for hiring new staff to the superintendent. The board president said that authorizing the superintendent to hire without board approval was designed to enable the immediate hiring of high-quality teachers at job fairs. If the superintendent does not attend a fair, principals or other attending district leaders contact the superintendent to authorize an immediate offer. The hiring process, supported by board policy, enables timely, efficient hiring of qualified candidates at recruitment events.

FINANCIAL OVERVIEW

House Bill 3, Eighty-sixth Legislature, 2019, made significant changes to the Foundation School Program (FSP). The legislation affected Brownfield ISD's entitlement, which is used to calculate the amount of state aid the district receives. Two of the major drivers of FSP entitlement to a school district include the district's student population and its property values. During school year 2018–19, Brownfield ISD had an average daily attendance (ADA) of 1,557.79. During the same period, Brownfield ISD's property value used to calculate FSP entitlement was $573,379,228. During school year 2017–18, Brownfield ISD had an ADA of 1,723.753. During the same period, Brownfield ISD's property value used to calculate FSP entitlement was $486,394,428. Brownfield ISD's maintenance and operations (M&O) tax rate increased from $1.0765 per $100 of property valuation in school year 2017–18 to $1.17 for school year 2018–19.

Pursuant to House Bill 3, Brownfield ISD's M&O tax rate decreased from $1.17 per $100 of property valuation to $1.0684 for school year 2019–20. Pursuant to the legislation, the LBB estimates that Brownfield ISD will receive an increase of $1,022,591 in total state and local revenue for

school year 2019–20 and can expect an increase of $1,049,937 in total state and local revenue for school year 2020–21 compared to what the district otherwise would have received. Included in these amounts is an estimated $122,444 in state funding attributable to the transportation allotment for school year 2019–20. Before the legislation's enactment, Brownfield ISD received $85,094 of state funding from the transportation allotment.

Senate Bill 11, Eighty-sixth Legislature, 2019, addressed school safety measures and standards, including the development of the school safety allotment. The allotment provides $9.72 per student in ADA to improve school safety and security. Brownfield ISD is estimated to receive an additional $15,386 for school year 2019–20 in related funding.

For school year 2018–19, Brownfield ISD adopted a budget of $17,868,714. Brownfield ISD's total actual expenditures were approximately $18,720,582. Brownfield ISD's actual operating expenditure per pupil during school year 2018–19 was $8,738, compared to the state average of $10,853. During school year 2018–19, Brownfield ISD spent approximately 52.3 percent of total actual operating expenditures for instruction compared to the state average of approximately 56.0 percent. The instructional expenditures percentage was calculated using the district's total actual operating expenditures that funded direct instructional activities, including the following functional categories: instruction; instructional resources and media sources; curriculum development and instructional staff development; and guidance, counseling, and evaluation services.

Brownfield ISD's School Financial Integrity Rating System of Texas rating was A/Superior for school year 2018–19. The district received a 1.5 Smart Score, with an academic performance rating of Very Low Academic Progress and a High spending rate for school year 2018–19.

EDUCATIONAL OVERVIEW

During school year 2018–19, Brownfield ISD's enrollment was 1,725 students, served by 132.9 full-time-equivalent teacher positions. The district operates six campuses, including one early education prekindergarten campus, two elementary schools, one middle school, one high school, and a disciplinary alternative education program and educational credit recovery campus. During school year 2018–19, the student population in Brownfield ISD was 74.8 percent Hispanic, 19.7 percent White, 3.4 percent African American, 1.5 percent two or more races, 0.3 percent Asian, and 0.3 percent American Indian.

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

Figure 1 shows the state accountability ratings for Brownfield ISD's campuses from school years 2016–17 to 2018–19. Brownfield ISD's accountability ratings have decreased during this period.

Figure 2 shows Brownfield ISD's state assessment results compared to the averages of other school districts in Regional Education Service Center XVII (Region 17) and the state in grades three to eight. Brownfield ISD's academic performance is below both regional and state averages in all grades and subjects except Mathematics. In Grade 8 Mathematics, Brownfield ISD was above the regional average, but lower than the state average.

Figure 3 shows secondary academic measures for Brownfield ISD compared to the averages of other school districts in Region 17 and the state. Brownfield ISD's academic performance is below both regional and state averages for all measures.

LBB SCHOOL PERFORMANCE REVIEW BACKGROUND

The Texas Legislature established the Texas School Performance Review in 1990. The Texas Government Code, Section 322.016, states that the review's purpose is to "periodically review the effectiveness and efficiency of the operations of school districts, including the district's expenditures for its officers' and employees' travel services. A review of a school district may be initiated by the board at its discretion or on the request of the school district. A review may be initiated by a school district only by resolution adopted by a majority of the members of the board of trustees of the district. If a review is initiated on the request of the school district, the district shall pay 25 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

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

DISTRICT/CAMPUS	2016–17	2017–18 (1)	2018–19
District	Met Standard	D	C
Brownfield High School	Met Standard	Met Standard	B
Brownfield Education Center	Met Alternative Standard (2)	Met Alternative Standard	C
Brownfield Middle School	Met Standard	Met Standard	C
Oak Grove Elementary School (3) (4)	Met Standard	Improvement Required	D
Colonial Heights Elementary School (3)	Met Standard	Improvement Required	D
Bright Beginnings Academic Center (4)	Met Standard	Improvement Required	C

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) Met Alternative Standard indicates acceptable performance; it is assigned to alternative education campuses that meet modified target scores on all required indices for which performance data are available.
(3) Colonial Heights Elementary School and Oak Grove Elementary School received a joint accountability rating for each of the comparison years.
(4) Bright Beginnings Academic Center received a joint rating with Oak Grove Elementary School for school years 2016–17 and 2017–18 and a joint rating with the district for school year 2018–19.
SOURCE: Texas Education Agency, School Accountability Ratings, school years 2016–17 to 2018–19.

FIGURE 2
BROWNFIELD ISD STUDENTS THAT SCORED AT OR GREATER THAN GRADE LEVEL ON THE STATE OF TEXAS ASSESSMENTS OF ACADEMIC READINESS COMPARED TO REGIONAL AND STATE AVERAGES
SCHOOL YEAR 2018–19

LEVEL	SUBJECT	BROWNFIELD ISD	REGION 17	STATE AVERAGE
Grade 3	Reading	31.0%	40.0%	45.0%
	Mathematics	30.0%	46.0%	49.0%
Grade 4	Reading	17.0%	39.0%	44.0%
	Mathematics	18.0%	43.0%	48.0%
	Writing	15.0%	27.0%	35.0%
Grade 5	Reading	35.0%	48.0%	54.0%
	Mathematics	40.0%	56.0%	58.0%
	Science	40.0%	47.0%	49.0%
Grade 6	Reading	17.0%	32.0%	37.0%
	Mathematics	29.0%	40.0%	47.0%
Grade 7	Reading	33.0%	45.0%	49.0%
	Mathematics	41.0%	42.0%	43.0%
	Writing	18.0%	37.0%	42.0%
Grade 8	Reading	29.0%	49.0%	55.0%
	Mathematics	53.0%	50.0%	57.0%
	Science	24.0%	46.0%	51.0%
	Social Studies	12.0%	32.0%	37.0%

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

FIGURE 3
BROWNFIELD ISD STUDENT ACADEMIC MEASURES COMPARED TO REGIONAL EDUCATION SERVICE CENTER XVII AND STATE AVERAGES
SCHOOL YEAR 2018–19

ADVANCED DUAL-CREDIT COURSE COMPLETION

COLLEGE-READY GRADUATES COMPLETING
ENGLISH AND MATHEMATICS (1)

SAT OR ACT PERCENTAGE OF STUDENTS TESTED

AVERAGE ACT SCORE

STUDENTS SCORING AT OR GREATER THAN CRITERION
ON SAT OR ACT (2)

GRADUATES ENROLLED IN TEXAS INSTITUTION
OF HIGHER EDUCATION
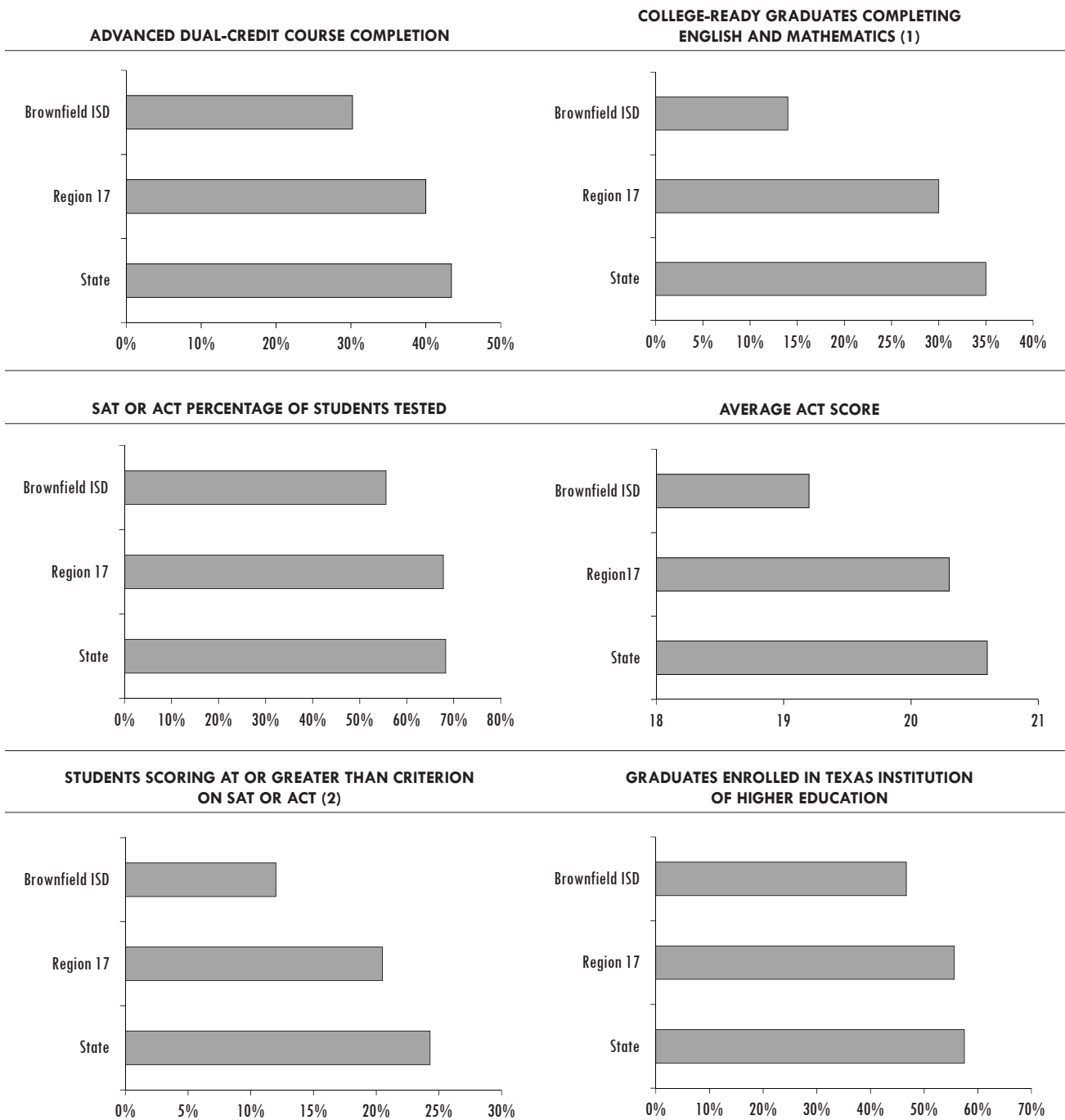
NOTES:
(1) To be considered college-ready, a graduate must have met or exceeded the college-ready criteria on the Texas Success Initiative Assessment, or the SAT or ACT standardized college admissions tests.
(2) Criterion refers to the scores on the SAT and ACT college admissions tests. For these tests, the criterion scores are at least a composite 24 on the ACT and at least 1110 total on the SAT.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2018–19.

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

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

Brownfield ISD is located in Brownfield. The district is served by Region 17, located in Lubbock. The state legislators for the district are Senator Charles Perry and Representative Dustin Burrows.

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 a fiscal chart, when appropriate, showing the chapter's recommendations that have estimated savings or costs for school years 2020–21 to 2024–25.

Figure 4 shows the estimated fiscal impact of all 50 recommendations included in the performance review. The district should determine the actual fiscal impact after reviewing the recommendations to determine the level of priority, appropriate timeline, and method of implementation.

FIGURE 4
BROWNFIELD ISD FISCAL IMPACT OF RECOMMENDATIONS, SCHOOL YEARS 2020–21 TO 2024–25

IMPACT	2020–21	2021–22	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
Gross Savings	$451,352	$451,352	$451,352	$451,352	$451,352	$2,256,760	$21,000
Gross Costs	($100,322)	($100,322)	($100,322)	($100,322)	($100,322)	($501,610)	($46,240)
Total	**$351,030**	**$351,030**	**$351,030**	**$351,030**	**$351,030**	**$1,755,150**	**($25,240)**

1. DISTRICT LEADERSHIP, ORGANIZATION, AND MANAGEMENT

Brownfield Independent School District (ISD) is located in Brownfield in Terry County and covers 6.0 square miles. During school year 2019–20, Brownfield ISD had 1,725 students. The district has six campuses, including one early childhood center, two elementary schools, one middle school, one high school, and one alternative education campus. A seven-member elected board governs Brownfield ISD, including two at-large and five single-member districts that each serve three-year terms.

Chris Smith has served as Brownfield ISD's superintendent beginning in school year 2018–19. The superintendent reports to the board, and three staff report directly to the superintendent.

ACCOMPLISHMENT

♦ The Brownfield ISD Board of Trustees participated as a group in long-range planning with the goal of improving district outcomes.

FINDINGS

♦ The district's superintendent and leadership do not use the budget to develop the district improvement plan or campus improvement plans.

♦ Brownfield ISD lacks a standardized, districtwide process for documenting and communicating operational procedures.

♦ Brownfield ISD does not adhere consistently to its policies regarding planning and decision making processes, especially those regarding district staff and public input into setting district and campus goals.

♦ The Brownfield ISD Board of Trustees has not established measurable objectives to hold the superintendent accountable for advancing student achievement and ensuring the district's efficient financial operations.

♦ Brownfield ISD's board meeting agenda preparation is not a collaborative process and does not facilitate participation by board members.

RECOMMENDATIONS

♦ **Recommendation 1: Connect the district improvement plan and campus improvement plans with the budget areas that specify performance targets for all programs and establish processes for tracking and reporting progress to campus administrators and the board of trustees.**

♦ **Recommendation 2: Develop and implement comprehensive written procedures for each of the district's functional areas.**

♦ **Recommendation 3: Require adherence to legal and local policies for participation in district-level and campus-level, site-based, planning and decision making processes.**

♦ **Recommendation 4: Incorporate specific, measurable performance standards into the superintendent's performance evaluation.**

♦ **Recommendation 5: Develop board operating procedures that facilitate collaboration with the superintendent to set board agendas.**

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 the resources to implement district priorities. The board and superintendent collaborate as a leadership team to meet district stakeholder needs.

Figure 1–1 shows Brownfield ISD's board members, their board positions, occupations, and their years of service.

The district adheres to the Texas Open Meetings Act by conducting monthly public board meetings facilitated by the board president. Staff display public notification of the meetings on a bulletin board outside of the district's central office and post them electronically on the district's website. The board addresses personnel matters and other confidential topics in closed sessions as needed. The board secretary

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

NAME	TITLE	TERM EXPIRATION	YEARS OF SERVICE (1)	OCCUPATION
Geoff Cooper	President/Position 4	2020	8	County Extension Officer
Tim Swaringen	Vice President/Position 5	2020	3	Self-employed
Cat Gonzalez	Secretary/At Large	2021	2	Administrator
Will Hawkins	At Large	2021	3	Administrator
Yvonne Rocha	Position 1	2022	9	Administrative Assistant
Randy Anthony	Position 2	2022	7	Self-employed
Cody Churchwell	Position 3	2022	1	Certified Plumber

NOTE: (1) Board members' years of service are shown as of December 2019.
SOURCE: Brownfield ISD, December 2019.

records minutes, and the board approves the minutes at its next meeting.

Figure 1–2 shows the district organization of Brownfield ISD.

DETAILED ACCOMPLISHMENT

BOARD TRAINING

The Brownfield ISD Board of Trustees participated as a group in long-range planning with the goal of improving district outcomes.

At the superintendent's suggestion, the board participated during June 2019 in two days of Lone Star Governance, a training program that provides coaching and support to boards and focuses on improving school outcomes. The superintendent, assistant superintendent, and chief financial officer (CFO)/human resources (HR) director completed training with the board to examine systems to manage the board's legal and fiscal responsibilities.

Training records provided by Texas Association of School Boards (TASB) for the past three school years showed that each board member averaged 15.0 hours annually in school board training. The Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter A, Section 61.1, and the Texas Government Code, Sections 551.005 and 552.012, combined, require school board members to complete a minimum of eight hours of training annually after their first year as a board member. For the time period from August 2019 to December 2019, the average training hours for Brownfield ISD board members is 53.0 hours.

By participating in group training to improve district performance and completing more training hours than the

FIGURE 1–2
BROWNFIELD ISD ORGANIZATION
SCHOOL YEAR 2019–20
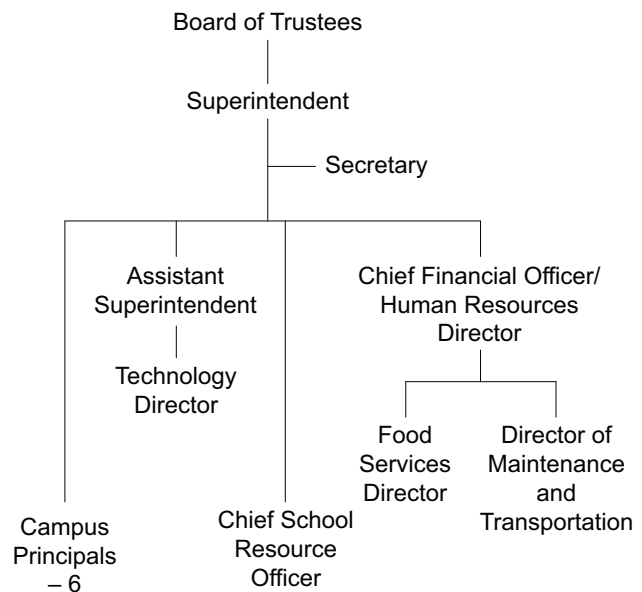
SOURCE: Brownfield ISD, December 2019.

required amount, the board demonstrates a strong commitment to the district and to constituents.

DETAILED FINDINGS

DISTRICT PLANNING AND BUDGET (REC. 1)

The district's superintendent and leadership do not use the budget to develop the district improvement plan or campus improvement plans.

Brownfield ISD Board Policy BQ (LEGAL) requires that its district improvement plan (DIP) include specific strategies to improve student performance and the resources needed to implement these strategies.

Two Brownfield ISD board Policies, BQA (LEGAL) and BQB (LEGAL), implement the Texas Education Code, Section 11.251(b)-(e), which requires the district to establish a district-level and campus-level planning and decision making process through the work of committees composed of district staff, parents, and community members. Board Policy BQA (LOCAL) establishes the District Planning Committee and identifies its duties and responsibilities, operations, and membership. Members of the committee are named in the school year 2019–20 DIP. Parents, community representatives, business representatives, teachers, central office administrators including the superintendent, and campus administrators serve on the committee.

Board Policy BQB (LOCAL) establishes a Campus Planning Committee for each campus, the members of which are named in the school year 2019–20 campus improvement plans (CIP). Membership depends on the size of the campus, but it typically includes teachers, professional nonteaching district and campus-level staff, parents, and representatives from the community and local businesses. The Legislative Budget Board's School Performance Review Team visited the district during December 2019. During onsite interviews with members of the DIP and CIP committees, staff reported that the DIP and CIP committees met at least once per school year.

The school year 2019–20 DIP and CIPs provided by the district reference only federal funding sources related to the Elementary and Secondary Education Act, Title I, and do not reference local or state funding resources. For example, the school year 2018–19 CIP for the middle school included security cameras to be installed as an improvement strategy, but the CIP does not identify the cost and funding sources. The middle school CIP for school year 2018–19 shows another goal to improve student achievement. One strategy it provides to reach this goal is to encourage teachers to obtain pre-advanced placement training certificates in different core areas. However, the CIP does not show the cost and funding sources for this training.

During onsite interviews, district-level and campus-level administrators could not explain why Brownfield ISD's DIP and CIPs do not contain any references to implementation costs of non-Title I strategies. Some campus administrators suggested that funding the strategies could come from discretionary funds provided to the campuses through the budgeting process or from noncampus-based funds. Others said that if they needed more funds, they would request them from the superintendent and the CFO when needed. Other staff reported that the software application that the district and campuses use to produce the DIP and CIPs does not have the ability to show the connection between funding sources and their intended goals, performance objectives, and strategies. However, the review team verified that the software application includes this ability. Additionally, the last page of each CIP is called Campus Funding Summary but is blank or contains zeros as amounts.
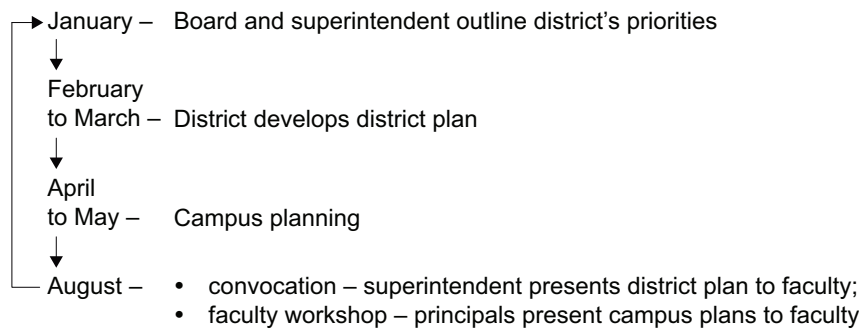
The timing of the preparation and board approval of the DIP, CIPs, and the budget are not consistent. The district completed its school year 2019–20 budget and presented it to the board for approval in August 2019. The district completed its school year 2019–20 DIP and CIPs and presented them to the board for approval in October 2019. District staff completed the DIP and CIPs after the budget was approved; therefore, the district could not make specific allocations in the budget to implement improvement strategies apart from Title I funding. By utilizing this structure, the district does not connect the DIP and CIPs to the district's budgeting process. The district shows no evidence that it revisits the budget after adopting the DIP and CIPs.

The amount of funding and resources committed to implementing a strategy to improve performance directly affects the development, quality, and potential success of the strategy. Brownfield ISD's lack of coordination between district and campus planning and the budget impedes the district's ability to improve student achievement. A district's ability to connect its annual budgetary process to district and campus improvement requires a district to have a completed DIP and CIPs at the beginning of the budgetary process. It is vital for school districts to connect their budgets with their goals, objectives, targets, and initiatives to ensure that they meets their priorities.

Many districts begin the district and campus planning process before the end of each school year. **Figure 1–3** shows a sample of this planning process.

Effective districts' boards and superintendents set priorities and goals for the district at a goal-setting meeting soon after the superintendent's appraisal, typically in December or January. When the district has a strategic plan in place, the

FIGURE 1–3
SAMPLE DISTRICT AND CAMPUS PLANNING PROCESS, CALENDAR YEAR 2011

January – Board and superintendent outline district's priorities

February to March – District develops district plan

April to May – Campus planning

August – • convocation – superintendent presents district plan to faculty;
• faculty workshop – principals present campus plans to faculty

SOURCE: Regional Education Service Center XIII, 2011.

board and superintendent review the plan for that school year and apply or modify the strategic plan goals as appropriate. These priorities and goals guide the development of the district plan during February and March, which consequently guides the development of campus plans in April and May. All plans are in draft form by the end of the school year to ensure that strategy implementation resources are included in the budget that the superintendent presents to the board for approval in June and July, and that resources are available for implementation in August. The Texas Education Agency (TEA) releases the State of Texas Assessments of Academic Readiness (STAAR) results after the district develops its plans; therefore, the district reviews and modifies goals and objectives that regard student performance directly at the beginning of the school year. The schedule enables principals to present the district and campus plans to campus staff at the beginning of the school year to ensure that all staff have a unified direction and that planned strategies are implemented immediately.

Brownfield ISD should connect the district improvement plan and campus improvement plans with the budget areas that specify performance targets for all programs and establish processes for tracking and reporting progress to campus administrators and the board of trustees.

To implement this recommendation, the district should develop a strategic planning process based on the one shown in **Figure 1–3**. To begin, the DIP should be based on the board's and superintendent's priorities. After the DIP is in place, district leadership should work with campuses to develop CIPs. After the DIP and CIPs are in place, the district leaders should present to the board a budget that funds the needs of the improvement strategies outlined in the plans. The district can revise the DIP and CIPs and the

budget after receiving STAAR results and TEA accountability results, which TEA distributes in August. The district could determine the vision, mission, goals, performance measures, and strategies as funding needs and requests during the budget development process before receiving the testing and accountability results from TEA. The DIP and CIP committees should hold planning development meetings and identify funding sources so that staff know the demands placed on the budget early in the budget development calendar.

The district could implement this recommendation with existing resources.

DISTRICT ADMINISTRATIVE PROCEDURES (REC. 2)
Brownfield ISD lacks a standardized, districtwide process for documenting and communicating operational procedures.

A key responsibility of school boards is to adopt local policies or rules that guide how the district operates. Local school boards govern by adopting policies that are consistent within the scope authorized by federal and state laws and regulations. Important decisions are made based on district policies. Procedures are the particular ways, guides, series of steps, cycle, or operations that district administrative leaders develop to ensure a consistent and repetitive approach for conducting the business of the district and decreasing process variation. Brownfield ISD Board Policy BP (LOCAL) states that the superintendent and administrative staff develop and enforce procedures for the operation of the district. These procedures are the administrative regulations of the district and consist of guidelines, handbooks, manuals, forms, and other documents that define standard operating procedures. Board Policy BQ (LOCAL) requires the district to develop administrative procedures in the areas of

planning, budgeting, curriculum, staff patterns, staff development, and school organization.

With the exception of written procedures in the Business Office manual and the Brownfield High School faculty and staff handbook, the district lacks a standardized, districtwide process for documenting and communicating operational procedures. The district does not have formalized, detailed operational procedures or operating manuals for the following functional areas: facilities, information technology, transportation, food services, safety and security, and educational service delivery.

Brownfield ISD maintains handbooks for employees, students, and some campus faculty, but information covered in each is neither dated nor correlated with board policy related to each topic. For example, the Brownfield ISD employee handbook contains abbreviated versions or condensed language of specific policies. The manual does not provide procedures or guides with progressive instructions. In onsite interviews, staff reported that they conduct daily operations based on an unwritten practices or informal understanding of policies.

The lack of a comprehensive and written administrative procedures manual or individual department manuals results in inconsistent, inefficient, and possibly noncompliant district operations. 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.

Efficient and effective school districts rely on administrative procedures manuals to develop processes and procedures that support the daily implementation of legal and local policies and practices. The Illinois Association of School Boards developed a checklist for its districts to develop administrative procedures. The checklist suggests the following requirements for administrative procedures:

- made available in hard copy or online in the district administrative offices and as necessary throughout the district;

- include all procedures expressly required by current board policy, state and federal law, and regulations;

- align with current board policy and district practices;

- have an easily identifiable coding system, alphabetical index, or search engine and table of contents;

- are clear and concise;

- are coded to correspond to the board policies they implement; and

- have implementation dates that are stated clearly at the end of each procedure.

Another resource available to districts is TASB's *Regulations Resource Manual*, which assists districts to develop procedures and regulations.

Brownfield ISD should develop and implement comprehensive written procedures for each of the district's functional areas.

The superintendent should appoint a central office administrator to gather written documentation from principals, district administrators, and departmental managers that are related to essential procedures and practices in each of their functional areas. The assigned central office administrator should ask these leadership staff to review and identify areas in which established and written procedures are outdated or do not exist. These staff should write and update procedures for all critical functions performed by their campuses or departments. The assigned central office administrator should edit submissions for consistency and compile a Brownfield ISD Administrative Procedures Manual for the superintendent's review. The assigned central office administrator should then publish the manual in hard copy and electronically. Leadership staff should review the procedures for their functional areas annually and submit revisions to the superintendent. Upon approval by the superintendent, the assigned central office administrator would publish annual updates of the manual.

The district could implement this recommendation with existing resources.

DISTRICT PLANNING COMMITTEE (REC. 3)

Brownfield ISD does not adhere consistently to its policies regarding planning and decision making processes, especially those regarding district staff and public input into setting district and campus goals.

Brownfield ISD Board Policy BQ (LEGAL) and Board Policy BQ (LOCAL) require the establishment of both district-level and campus-level planning and decision making processes. Establishing these processes involves the

board, professional staff, parents, business representatives, and community representatives collaborating to establish and review the district's and campuses' educational plans, goals, performance objectives, and major classroom instructional programs. The board and district administration did not provide evidence that the comprehensiveness required by these policies follows an established process. In interviews with board members and district and campus administrators, the review team learned that the district has not established a formal written process.

A review of agenda and minutes of previous board meetings for the past three school years does not show that the board has held a board meeting, workshop, or public input meeting dedicated to district or campus-level planning. Board minutes show that the administrative team places on the agenda of a regular board meeting the vision statement or mission and goals statements for the board to approve. When the item comes up on the agenda, minutes show that brief discussions occur, and the board typically approves the item. Board members acknowledged this general procedure as the extent of their input into district and campus planning.

Brownfield ISD Board Policy BQA (LOCAL) implements the Texas Education Code, Section 11.251(b)-(e), which requires a district-level, site-based, planning and decision making committee. Board Policy BQA (LOCAL) designates this site-based committee as the District Planning Committee (DPC) and outlines the committee's duties and responsibilities, operations, and membership. Both Board Policy BQA (LOCAL) and Texas Education Code, Section 11.251(b)-(e) state the requirement for public input and participation. Both policies state that each constituent group must nominate and vote for teachers, nonteaching professional staff, and district-level professional staff to be named to the committees. Current members of the DPC are named in the school year 2019–20 DIP, including the following 23 members:

- two parents;

- one community representative;

- one business representative;

- six teachers;

- three key central office administrators, including the superintendent;

- seven campus-based administrators;

- two counselors; and

- one librarian.

During its onsite visit, the review team conducted a focus group with Brownfield ISD planning committee members to discuss the work, participation, and membership of district and campus planning committees. Participants in the focus group could not verify that parents or community representatives regularly or consistently attended any of the DIP or CIP meetings or otherwise provided input. Nor could they affirm that they had nominated or elected members of the district planning committee. All DPC members said they were asked to serve, and they accepted the invitation.

According to focus group participants, at the August 2019 meeting of the DPC, the assistant superintendent presented the DPC members with a written draft of the vision and goals to be included in the DIP. The focus group participants reported that the assistant superintendent said that the DIP had been placed on the board agenda, and approval by the board would be sought at its next meeting. Performance objectives for each of the goals were not included in the first draft. Strategies to achieve the performance objectives and funding or resources were not discussed. Members did not perceive the meeting to be for purposes of input or development but for endorsement of what the administrative staff had prepared. Performance measures or proposed strategies to meet each goal were not added to the DIP until after the board's October 2019 meeting.

Minutes of all board meetings for the past three school years show limited public input during the "open microphone" segment of the meetings that related to the district's educational and instructional programs. Staff state that the lack of participation was due to satisfaction among the community, parents, and the public with how the district is governed and administered. This conclusion assumes that all public input must be negative. District staff stated that the only time someone speaks to the board during public input is when the speaker has something negative to say.

Figure 1–4 shows requirements of Brownfield ISD's legal and local board policies, whether the district is meeting the policy criteria, and an assessment of the district's actions. Brownfield ISD is not adhering to its legal and local policy requirements in several areas.

In addition to providing transparency, a school board's public policies present the concerns of the taxpayers

and parents to the school administrators and represents the needs of the students and school district to the community. The board sets the policies, goals, and objective for the district, and holds the superintendent responsible to implement the policies and achieve the goals. Effective school boards schedule specific and public board work sessions or workshops in the community that are announced publicly to obtain input. Other boards augment public meetings by conducting online surveys to gather input and to capture feedback from a greater number of stakeholders. The result of these surveys can identify areas in the school district's operations in which the community's understanding of the state of the district may be lacking.

FIGURE 1–4
BROWNFIELD ISD BOARD COMPLIANCE WITH BOARD POLICIES
SCHOOL YEAR 2019–20

POLICY	DESCRIPTION	BOARD MEETS CRITERIA	ASSESSMENT
BQ (LEGAL)	Board shall establish a district and campus planning and decision making process to establish goals, performance objectives, and major classroom instructional program.	No	No written process to develop a district improvement plan (DIP) or campus improvement plans (CIP) was provided by the district.
BQ (LEGAL)	Every two years, the district shall evaluate the effectiveness of decision making policies, procedures, and staff development activities to ensure they are effectively structured.	No	The district did not provide evaluations.
BQ (LEGAL)	Board shall ensure administrative procedures are provided to clearly define the respective roles of the superintendent, central office staff, principals, teachers, district-level and campus-level committee members in the areas of planning, budgeting, curriculum, staffing patterns, staff development, and school organization.	No	The district did not provide written procedures or other evidence of these requirements.
BQ (LEGAL) (LOCAL)	Board shall ensure that the DIP and CIP committees will be actively involved in establishing administrative procedures that define their roles and responsibilities in the planning and decision making process.	No	Staff on these committees stated in onsite interviews that there were no written procedures.
BQ (LOCAL)	The board shall approve the process through which the educational goals are developed and shall ensure that input is gathered from the district-level committee.	No	The district did not provide a written process to develop a DIP or CIPs.
BQ (LOCAL)	The board shall ensure that data are gathered and criteria developed before the required biennial evaluation of the process.	No	According to board agenda and minutes, this evaluation has not occurred during the past three years.
BQA (LEGAL) (LOCAL)	Board policies and procedures shall establish a district-level planning and decision making committee.	Yes	The district has a district improvement committee and campus improvement committees.
BQA (LOCAL)	The district-level planning and decision making committee shall approve staff development of a districtwide nature.	No	The district did not provide evidence of discussion or approval of staff development by the district-level, site-based, planning and decision making committee.
BQA (LEGAL)	The district-level planning and decision making committee shall include parents of students, business representatives, and community members.	Yes	The current DIP, approved by the board in October 2019, contained a list of committee members showing two parents, one community representative, and one business representative. One of these parents is the spouse of a board member, and the business representative is the spouse of a Brownfield ISD principal.

FIGURE 1–4 (CONTINUED)
BROWNFIELD ISD BOARD COMPLIANCE WITH BOARD POLICIES
SCHOOL YEAR 2019–20

POLICY	DESCRIPTION	BOARD MEETS CRITERIA	ASSESSMENT
BQA (LEGAL)/ BQA (LOCAL)	The district's professional staff nominates and elects the professional staff representatives that serve on the district-level planning and decision making committee.	No	District-level, site-based, planning and decision making committee members stated in onsite interviews that membership is the result of selection rather than election. The district did not provide evidence of nomination and elections for the committee.
BQA (LEGAL)	The district-level planning and decision making committee shall include at least one professional staff member whose primary responsibility is educating students with disabilities.	Yes	A social–emotional counselor is listed.
BQA (LEGAL)	At least two-thirds of the elected professional staff representatives must be classroom teachers.	No	Of the 19 members identified as district professional staff, six (31.0 percent) are teachers. The majority of the members are either central office or school-based administrators.
BQA (LEGAL)	The district-level planning and decision making committee shall hold regular meetings.	No	One informal meeting of the committee was held during calendar year 2019 before the DIP was scheduled to be presented to the board.
BQA (LOCAL)	The district-level planning and decision making committee chairperson shall schedule at least two meetings per year.	No	One informal meeting of the committee was held during calendar year 2019 before the DIP was scheduled to be presented to the board.
BQA (LEGAL)	The district-level planning and decision making committee shall hold at least one public meeting per year after receipt of the annual district performance report from the Texas Education Agency.	No	The regular board meeting in which the performance report was presented publicly does not meet the requirement for a public DIP committee meeting.
BQA (LEGAL)/ BQA (LOCAL)	Systematic communication in place to periodically obtain broad-based community, parent, and staff input and to provide information to those persons regarding the recommendations of the district level committee.	No	The district has identified the means of communication that will be used to inform public entities of the work of the district planning and decision making committee. No methods or measures of receiving input is established. No evidence shows that the public is invited to meetings to provide input.
BQA (LEGAL)	The superintendent shall regularly consult the district-level planning and decision making committee in the planning, operation, supervision, and evaluation of the district's educational programs.	Yes	Staff stated during onsite interviews that the district site-based planning and decision making committee had met once during the school year. During that meeting, the assistant superintendent presented members a written draft of the vision and goals that would be in the DIP. The DIP already had been placed on the board agenda for approval by the board at its next meeting. The district committee had not been consulted about the DIP draft.
BQA (LOCAL)	The district-level planning and decision making committee shall include at least two community representatives and at least two business representatives.	No	Only one representative of each category is identified.

Sources: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

Brownfield ISD should require adherence to legal and local policies for participation in district-level and campus-level, site-based, planning and decision-making processes.

Brownfield ISD board members should continually recruit constituents to volunteer for nomination and election to serve on the DIP and CIP committees and to attend board meetings to share their opinions and concerns about the district's effectiveness.

Principals should ensure that staff participate as members of the CIP committee for the subsequent school year. The superintendent should ensure that appropriate members are identified to participate in the DPC. Simultaneously, district and campus administrators should openly solicit parents, community, and business representatives to serve on improvement planning committees by sending notices and making public announcements that they are seeking volunteers for nomination and election to the committees.

Before the end of the current school year, the CIP committees should meet to plan subsequent meetings throughout the upcoming school year. Within the same period, the DPC should be convened so that district results can be presented and input received from district and nondistrict members. In keeping with district policies, at least two additional meetings of both types of committees during the subsequent school year should be scheduled.

The district could implement this recommendation with existing resources.

BOARD EVALUATION OF SUPERINTENDENT (REC. 4)

The Brownfield ISD Board of Trustees has not established measurable objectives to hold the superintendent accountable for advancing student achievement and ensuring the district's efficient financial operations.

Board Policy BJCD (LEGAL) requires that the board periodically evaluate the superintendent's leadership, governance, and teamwork. Board Policy BJA (LEGAL) requires the board to ensure that "the superintendent is accountable for achieving performance results, recognizes performance accomplishments, and takes action as necessary to meet performance goals." The same policy requires the board to monitor district finances to ensure that the superintendent is maintaining the district's financial procedures and records properly. The board, however, has not specified measurable performance goals by which to evaluate the superintendent's performance. Neither the

superintendent's contract nor the board's evaluation tool establishes such goals.

In its regular meeting in October 2019, the board approved the DIP, which included the following high-level goals to guide the district:

- increase all student growth on state and local unit assessments to help students meet their educational potential;

- increase student attendance and completion rates;

- maintain a safe, drug–free, and secure environment for staff and students;

- foster positive community, parent, teacher, and student communication and relationships to involve parents as partners to promote student learning;

- recruit and maintain a highly qualified staff; and

- implement technology to increase the effectiveness of student learning, instructional management, and staff development.

None of these goals addresses the need to monitor the district's financial conditions, stability, or funding and spending.

At the time of the board's approval of the DIP, the document did not contain measurable performance objectives. The superintendent and his staff prepared the performance objectives after board approval of the DIP. Although the goals and performance objectives set a broad challenge for the district, the board has not articulated these goals and their performance objectives into how their success would be used as performance measurements in the superintendent's evaluation. The Texas Administrative Code, Chapter 150, Section 1031 contains general provisions for superintendent appraisal. School districts may choose the superintendent appraisal system recommended by the Commissioner of Education or a local superintendent appraisal system. In addition to other procedures and criteria determined by the school district board of trustees, the commissioner's recommended appraisal process and criteria for a superintendent shall include, at a minimum an annual evaluation of the superintendent and a student performance domain.

As provided in the Texas Education Code, Section 21.354, the board uses the Commissioner of Education's recommended performance rubric as a tool for its evaluation

of the superintendent. The tool provides an opportunity for board members to rate the superintendent on each of four key performance indicators: student performance, educational leadership, district management, and board and community relations. However, the rubric lacks any reference points to guide determinations of whether progress toward the board's specific goals has been sufficient.

Onsite interviews with board members indicate that they were not aware of any written performance objectives specifically for the superintendent that the board would use in its next evaluation of the superintendent. Board members said that they expect the superintendent to determine and meet performance milestones independently. The superintendent stated in onsite interviews that in his post-evaluation conference, he and the board president informally discussed specific and individual performance objectives that would guide his evaluation. The district did not provide the review team or the board with written copies of that conference's results.

The lack of specific performance objectives to evaluate the superintendent denies the board of a way to determine whether the district has made progress in any of the DIP goals or any financial indicators that are a result of the superintendent's efforts and the board's expectations. Without this information, the board is unable to hold the superintendent accountable for his responsibility to improve student performance and to manage the district's finances. Subsequently, the board cannot require that the superintendent adjusts his performance when progress is insufficient or performance decreases. If the board evaluates the superintendent only on self-selected goals, the board cannot sustain progress achieved during one superintendent's tenure when a new superintendent assumes the position. If the district's direction changes with each new administration, the district risks inconsistent progress.

Effective business and professional organizations recognize that performance management is necessary to align staff efforts with the organization's expectations. When implementing performance management systems to evaluate chief executive officers, managing boards of trustees typically include the following broad elements:

- goal setting – establish annual objectives or performance goals that align with the organization's goals;

- performance review – assess the executive's progress toward meeting the goals; and

- performance improvement plans – broadly written statements and documents regarding the board's expectations for sustained or consistent performance, especially in areas wherein the executive might not be meeting performance expectations.

TASB has developed a template for superintendent evaluation with guidance to identify specific performance objectives. This template provides guidance to help boards define and evaluate measurable performance objectives. For example, the template suggests, among other indicators, that the board should evaluate the superintendent based on a "trend of ongoing improvement as reflected in longitudinal data on student scores." The template further suggests that the board "may want to include its specific target for student achievements," and that if the board has chosen to monitor specific subjects, in addition to state test scores, "the board should indicate the data that will be used to measure achievement in those subjects." TASB's template also provides examples of ways in which a board may set specific performance objectives in domains outside student performance. For example, for facilities management and operations and district budgeting and finances, the template recommends that the board determines whether the superintendent "maintains a management system designed to produce ongoing efficiencies in major district operations, including transportation, food services, and building maintenance and operations" by reviewing the superintendent's goals, targets, and benchmarks.

The Brownfield ISD board should incorporate specific, measurable performance standards into the superintendent's performance evaluation.

To accomplish this recommendation, the board and the superintendent should collaborate to develop measurable objectives aligned with the goals approved by the board in the DIP. As the first step in this process, the superintendent and the board should consider using the TASB template to determine whether it adequately addresses the district's six goals and adjusting the template's use for this purpose if needed.

The superintendent should present to the board data documenting the status of the district's performance regarding indicators specified in the template. The board and superintendent jointly should review the baseline data and establish midyear and end-of-year objectives. The district should incorporate end-of-the-year objectives into the TASB template for summative evaluation purposes, and include the

midyear objectives for informal midyear review. The superintendent should then finalize the evaluation tool for adoption by the board.

The district could implement this recommendation with existing resources.

BOARD MEETING AGENDA (REC. 5)

Brownfield ISD's board meeting agenda preparation is not a collaborative process and does not facilitate participation by board members.

The Texas Education Code, Chapter 11, Subchapter D, grants a school district's board of trustees, as a corporate body, exclusive powers and duties to govern, oversee, and manage the public schools of the district. Some school boards publish operating procedures that clearly define their roles and distinguish the board's and superintendent's separate responsibilities. Brownfield ISD did not provide operating procedures to the review team. During onsite interviews, Brownfield ISD board members stated that they were not aware of any board operating procedures.

All board members, the superintendent, the assistant superintendent, and the CFO/HR director participated in training provided by TEA through its Lone Star Governance framework initiative. Central to the framework and subsequent training is the premise that the board, in collaboration with its superintendent, can focus intensely on only one primary objective: improving student outcomes. According to board minutes for the August 2019 regular board meeting, the board adopted a vision statement that the superintendent presented following a brief overview and discussion. Board members told the review team in onsite interviews that they were beginning to implement some of the tenets of their Lone Star Governance training, in particular a shortened agenda and, thus, a shorter meeting.

The superintendent stated that he typically calls the board president before sending out the next board meeting's packet to discuss the agenda. However, the board president and other members said that they do not know what is on the agenda for any upcoming board meeting or any details for included items until they receive the hand-delivered or electronically sent board packet late on Friday afternoons before the regular meeting times on Mondays.

Contrary to training that the board members received as part of Lone Star Governance to "ensure creation of a shared vision that promotes student achievement," the board members reportedly do not have input in setting the agenda before a meeting. Minutes of subsequent board meetings after the training do not show any agenda items specifically identified as collaborative goal setting between the superintendent and the board. Without formal board operating procedures to guide members in their actions, such as agenda setting, members may not be aware of how the board should implement district policy or work together effectively.

An example of a best practice in the area of board-superintendent collaboration is Jim Hogg County ISD Board of Trustees Code of Ethics and Board–Superintendent Operating Procedures, Section I, states that the superintendent drafts agendas in consultation with the board president, but final approval for the agenda is the sole authority of the board president.

The Brownfield ISD board should develop board operating procedures that facilitate collaboration with the superintendent to set board agendas.

The board should begin this process by writing procedures that include the process of developing a board agenda. Board members should communicate with the board president to place items on the agenda for discussion. The board president then should collaborate with the superintendent to develop the agenda jointly. The board president and superintendent should agree on the subjects and presenters of reports, and how the substance of reports meets the district's vision and efforts. These formal board reports could include presentations from different campuses, academic departments, and functional areas.

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 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.

2. EDUCATIONAL SERVICE DELIVERY

Brownfield Independent School District (ISD) has six campuses that include Bright Beginnings Academic Center, an early education prekindergarten campus; two elementary school campuses; one middle school campus; one high school campus; and the Brownfield Education Center, a split program that includes a Disciplinary Alternative Education Program and an educational credit recovery program. District enrollment for school year 2018–19 was 1,725 students.

For school year 2018–19, the student population in Brownfield ISD was 74.8 percent Hispanic, 19.7 percent White, 3.4 percent African American, 1.5 percent two or more races, 0.3 percent Asian, and 0.3 percent American Indian.

FINDINGS

♦ Brownfield ISD does not have a consistently implemented curriculum management plan that includes relevant staff.

♦ Brownfield ISD does not address students' social and emotional needs adequately.

♦ Brownfield ISD has not evaluated teaching and support staffing levels and assignments to determine whether services are sufficient to meet student needs.

♦ Brownfield ISD's Disciplinary Alternative Education Program does not meet students' behavioral and instructional needs.

♦ Brownfield ISD does not have a consistent districtwide behavior management plan.

♦ Brownfield ISD does not offer a comprehensive program to meet the instructional needs of students identified as English learners.

♦ Brownfield ISD does not offer a comprehensive program to meet the instructional needs of students identified as gifted and talented.

RECOMMENDATIONS

♦ **Recommendation 6: Develop a curriculum management plan that supports the district's needs and monitor the plan's implementation.**

♦ **Recommendation 7: Clarify the roles of counselors, teachers, and other staff to provide better suicide prevention and intervention and social and emotional learning services to students.**

♦ **Recommendation 8: Develop a campus staffing allocation model based on best practices and guidelines that meet student needs.**

♦ **Recommendation 9: Assess the Disciplinary Alternative Education Program's ability to meet students' behavioral and academic needs.**

♦ **Recommendation 10: Develop and implement a consistent districtwide behavior management system that includes staff support and data analysis.**

♦ **Recommendation 11: Improve the English as a second language program and evaluate the program to ensure that it meets English learner students' needs.**

♦ **Recommendation 12: Develop and implement a comprehensive gifted and talented program to meet such identified students' instructional needs.**

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 various student groups and requires adherence to state and federal regulations related to standards, assessments, and program requirements.

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

Figure 2–1 shows the demographics of Brownfield ISD compared to state averages. During school year 2018–19,

approximately 80.8 percent of students were identified as economically disadvantaged, greater than the state average of 60.6 percent. The district identified 7.8 percent of its students as English learners (EL), which is less than the state average of 19.5 percent.

Figure 2–2 shows the Texas Education Agency (TEA) accountability ratings for Brownfield ISD and its campuses for school years 2016–17 to 2018–19. Brownfield ISD met state standards at the district level for school year 2016–17; however, the district received a D rating on the new academic rating scale during school year 2017–18. The district received a C rating during school year 2018–19. Campuses in the district have received a range of scores, including two campuses that received D ratings during school year 2018–19.

The Legislative Budget Board's School Performance Review Team visited the district during December 2019. **Figure 2–3** shows the Brownfield ISD educational service delivery organization at the time of the team's onsite visit. The educational service delivery organization includes the superintendent, an assistant superintendent of instruction that oversees five department staff and six principals.

DETAILED FINDINGS

CURRICULUM MANAGEMENT (REC. 6)

Brownfield ISD does not have a consistently implemented curriculum management plan that includes relevant staff.

FIGURE 2–1
BROWNFIELD ISD STUDENT DEMOGRAPHICS
SCHOOL YEAR 2018–19

STUDENTS	DISTRICT	STATE AVERAGE
Hispanic	74.8%	52.6%
White	19.7%	27.4%
African American	3.4%	12.6%
Two or More Races	1.5%	2.4%
Asian	0.3%	4.5%
American Indian	0.3%	0.4%
Economically Disadvantaged	80.8%	60.6%
English Learners	7.8%	19.5%

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

Curriculum management plans are a systematic, defined program of curriculum development, assessment, implementation, and evaluation of a district's curriculum. Districts receive feedback on the quality and implementation of their curriculum through statewide exams, which are tied to the state curriculum, as well as district ratings, which are partially based on district exam performance. Although the district has increased its overall districtwide accountability rating from a D to a C, as shown in **Figure 2–2**, student performance remains less than state averages in every tested area. **Figure 2–4** shows the percentage of students grades 3 to

FIGURE 2–2
BROWNFIELD ISD STATE ACCOUNTABILITY RATINGS
**SCHOOL YEARS 2016–17 TO 2018–19**

DISTRICT/CAMPUS	2016–17	2017–18 (2)	2018–19
District	Met Standard	D	C
Brownfield High School	Met Standard	Met Standard	B
Brownfield Education Center	Met Alternative Standard (1)	Met Alternative Standard	C
Brownfield Middle School	Met Standard	Met Standard	C
Oak Grove Elementary School (3) (4)	Met Standard	Improvement Required	D
Colonial Heights Elementary School (3)	Met Standard	Improvement Required	D
Bright Beginnings Academic Center (4)	Met Standard	Improvement Required	C

NOTES:
(1) Met Alternative Standard indicates acceptable performance; it is assigned to alternative education campuses that meet modified target scores on all required indices for which it has performance data.
(2) The Legislature changed the rating system structure for Texas public schools. During school year 2017–18, school districts received an alphabetical rating, and during school year 2018–19 districts and campuses received alphabetical ratings.
(3) Colonial Heights Elementary School and Oak Grove Elementary School received a joint accountability rating for each of the comparison years.
(4) Bright Beginnings Academic Center received a joint rating with Oak Grove Elementary School for school years 2016–17 and 2017–18 and a joint rating with the district for school year 2018–19.
SOURCE: Texas Education Agency, School Accountability Ratings, school years 2016–17 to 2018–19.

FIGURE 2–3
BROWNFIELD ISD EDUCATIONAL SERVICE DELIVERY ORGANIZATION
SCHOOL YEAR 2019–20
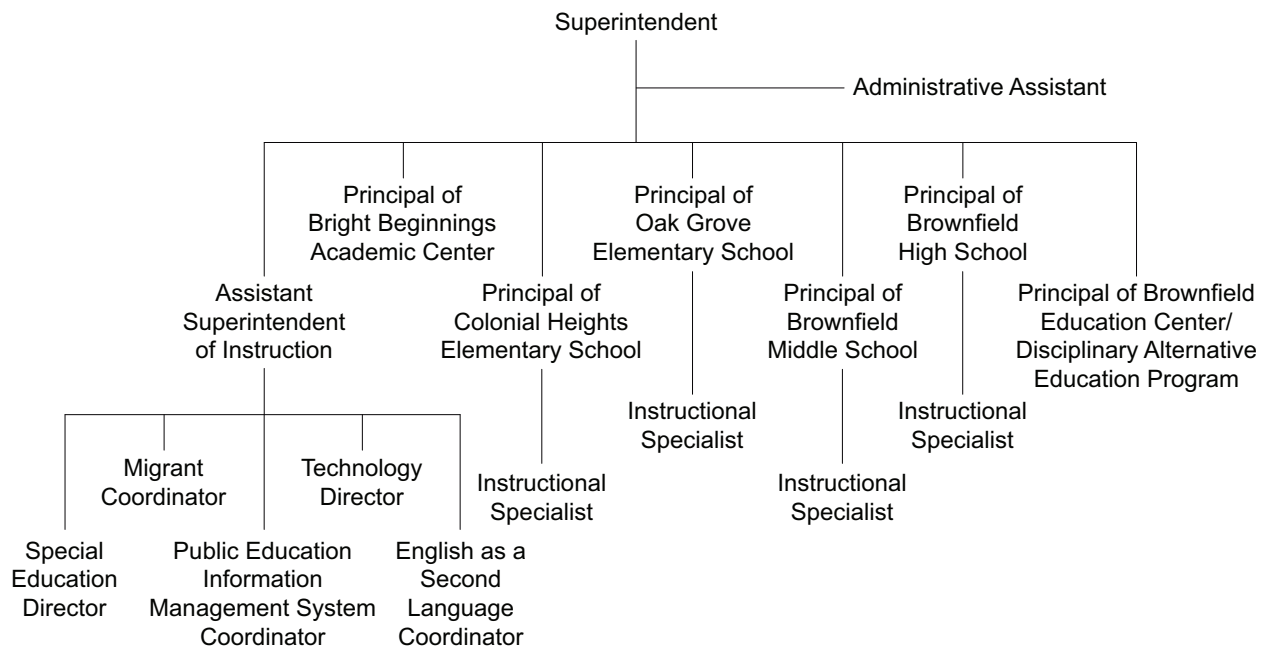
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

FIGURE 2–4
BROWNFIELD ISD STUDENTS THAT SCORED AT OR GREATER THAN GRADE LEVEL ON THE STATE OF TEXAS ASSESSMENTS OF ACADEMIC READINESS COMPARED TO STATE AVERAGES
SCHOOL YEAR 2018–19

LEVEL	SUBJECT	BROWNFIELD ISD	STATE AVERAGE
Grade 3	Reading	31.0%	45.0%
	Mathematics	30.0%	49.0%
Grade 4	Reading	17.0%	44.0%
	Mathematics	18.0%	48.0%
	Writing	15.0%	35.0%
Grade 5	Reading	35.0%	54.0%
	Mathematics	40.0%	58.0%
	Science	40.0%	49.0%
Grade 6	Reading	17.0%	37.0%
	Mathematics	29.0%	47.0%
Grade 7	Reading	33.0%	49.0%
	Mathematics	41.0%	43.0%
	Writing	18.0%	42.0%
Grade 8	Reading	29.0%	55.0%
	Mathematics	53.0%	57.0%
	Science	24.0%	51.0%
	Social Studies	12.0%	37.0%

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

8 that scored at or greater than grade level by subject on the State of Texas Assessments of Academic Readiness (STAAR) for school year 2018–19.

Average STAAR end of course (EOC) exam results for Brownfield ISD also demonstrate low student performance. **Figure 2–5** shows that Brownfield ISD students, on average, scored at or greater than grade level expectations at a lower rate than the state average on every EOC exam.

The assistant superintendent stated that the district has not developed its own curriculum management plan, although the district currently uses third-party resources and reportedly plans to develop its own resource. During interviews, the superintendent and the assistant superintendent said that, before school year 2018–19, the district used various curriculum strategies without a formal plan. The assistant superintendent stated that the district paid for several curriculum plans but did not adopt them widely or publicize them. The superintendent said that the district began using the Texas Essential Knowledge and Skills Resource System (TRS) as a curriculum resource during school year 2018–19 in an effort to improve curriculum alignment in the district and decrease curriculum costs. The superintendent and the assistant superintendent reportedly made these decisions without the input of teachers and administrative staff that have specific curriculum needs, such as the English as a second language (ESL) program staff, special education staff, and career and technical education (CTE) staff. Although staff reportedly have made an effort to track testing progress and provide interventions for individual students, the district has not reevaluated the curriculum system based on an assessment of broad aggregate areas of low scores.

TRS includes various resources, such as: the Vertical Alignment Document (VAD), which provides expectations across grade levels; the Year at a Glance (YAG), which provides a pacing guide for the year's instructional plan; the Instructional Focus Document (IFD), a guide for each educational unit; and several other resources. Considering which resources are required for teachers, assistant principals said that teachers and other staff use the VAD, but did not cite other resources. Principal input on this topic varied; some principals reported that teachers were required to use every resource in the TRS, and others said that teachers used VAD only during regular planning. The superintendent said that teachers are required to use the IFD, and some teachers reported using the IFD and YAG in planning. Staff said that the use of TRS elements varied by campus and teacher.

FIGURE 2–5
BROWNFIELD ISD STUDENTS SCORING AT OR GREATER THAN GRADE LEVEL ON THE STATE OF TEXAS ASSESSMENTS OF ACADEMIC READINESS END-OF-COURSE EXAMS COMPARED TO STATE AVERAGES
SCHOOL YEAR 2018–19

ASSESSMENT	BROWNFIELD ISD	STATE AVERAGE
English I/Reading I	26.0%	50.0%
English II/Reading II	22.0%	49.0%
Algebra I	51.0%	61.0%
Biology	40.0%	62.0%
U.S. History	43.0%	73.0%

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

The assistant superintendent said that the district has adopted other curriculum to support the TRS and courses that the system does not cover, such as CTE. The district provided a list of these materials to the review team, and it included 57 different publications that covered material ranging from personal finance to environmental science.

The district has increased monitoring of curriculum implementation. During school year 2017–18, the district added four instructional specialist positions to increase fidelity to the TRS curriculum goals by planning with and training teachers. The district requires teachers to participate in regularly scheduled professional learning community (PLC) time, during which teachers plan lessons and share resources with other teachers in the same or similar fields. District leadership schedules one day of PLC time per week at each campus.

Teaching staff are required to enter their lesson plans into the district's licensed system of educators' resource software, called Eduphoria. In interviews, teachers said that they did not receive feedback on lesson plans and were uncertain if administrative staff reviewed the plans. The district has no clear enforcement of the requirement. Teachers said that instructional specialists work with them during the PLC time to assist in planning, when they are available. At the time of the review team's onsite visit, two of the four instructional specialists either had been or were operating as full-time teachers to mitigate a shortage in available staff. For example, one instructional specialist had been working as a full-time math teacher to cover the classroom after a teacher left the district.

The instructional specialist positions do not have job descriptions within the district. In addition to the training role, instructional specialists reported that their duties include providing instructional technology support, developing unit assessments, providing disciplinary assistance, and visiting classrooms. In addition, it is unclear who determines which teachers are in need of their assistance. Instructional specialists said that they prioritize new teachers and work with campus principals to determine the teachers that need the most support. Principals said that they determine which teachers receive support based on what they see during classroom walkthroughs and in teacher evaluation results. The job duties of principals and assistant principals include the classroom walkthroughs requirement, but they do not specify the number of walkthroughs these staff should perform.

It also is unclear how staff that teach populations with specific needs, such as special education students, EL students, and other groups, factor into the district's curriculum decision making. The superintendent and assistant superintendent are entirely responsible for adopting curriculum, with no regular input from other staff or from groups with more specific needs. The superintendent and assistant superintendent said that they consult with staff that report having additional needs, but this consultation is not a strategic, planned part of the adoption process.

The absence of a systemic curriculum management plan that makes expectations clear to all stakeholders, differentiates instruction delivery to students with diverse needs, and establishes procedures for the implementation and monitoring of adopted curriculum can result in the district not meeting instructional needs and in poor implementation of curriculum.

The Association for Supervision and Curriculum Development provides guidance and sample operating procedures in a chapter of Align the Design, "Developing Curriculum Leadership and Design." This document walks the district through specific steps in curriculum planning, including data analysis, assessments, writing, and implementation.

Examples of effective curriculum planning at the district level include those used in Texarkana ISD and Bryan ISD. Texarkana ISD's curriculum management plan is available on the district's website. The plan includes the philosophy of its curriculum structure, the roles and responsibilities in maintaining and reviewing the plan, and an annual or biannual review of each course's curriculum. Bryan ISD developed a comprehensive curriculum management plan that outlines the district's philosophy, curriculum management, curriculum expectations, instructional expectations, tested curriculum, and roles and responsibilities of all stakeholders. Bryan ISD's curriculum management plan is available on the district's website.

Brownfield ISD should develop a curriculum management plan that supports the district's needs and monitor the plan's implementation.

To accomplish this recommendation, the superintendent should assemble a committee consisting of administrators, teachers, parents, instructional specialists, special education staff, ESL program staff, and any other relevant stakeholders to develop and implement a curriculum management plan. The committee should examine the current systems to monitor and implement curriculum, analyze students' scores, and determine areas that need special focus. After the committee has completed these analyses, it should develop a formalized curriculum management plan that meets these needs and includes specific requirements for the implementation and monitoring of the plan.

The superintendent should set clear expectations for instructional staff and administration in determining which instructional resources to use and how staff should use resources to maximize instruction. The plan should establish procedures to monitor the curriculum's implementation consistently so that all students benefit from targeted and high-quality instruction in all content areas. The curriculum management plan should include a process for district leadership to hold instructional staff and administration accountable for implementing the plan. The committee should determine a regular cycle to review and update the curriculum management plan to ensure that the district is meeting student needs.

The district could implement this recommendation with existing resources.

SOCIAL AND EMOTIONAL NEEDS (REC. 7)

Brownfield ISD does not address students' social and emotional needs adequately.

The review team surveyed Brownfield ISD parents, campus staff, and district staff before the onsite visit. The responses indicate that these stakeholders have observed several harmful student behaviors in the district. **Figure 2–6** shows the

FIGURE 2–6
BROWNFIELD ISD CAMPUS AND DISTRICT STAFF AND PARENT SURVEY NOTING PREVALENT HARMFUL STUDENT BEHAVIORS
DECEMBER 2019

BEHAVIOR	CAMPUS STAFF	DISTRICT STAFF	PARENTS
Cyberbullying	33.3%	54.6%	44.4%
Verbal assault	51.8%	63.6%	58.9%
Physical fights	34.9%	54.6%	38.9%
Drug and alcohol use	55.6%	63.6%	70.8%

SOURCE: Legislative Budget Board School Performance Review Team Survey, December 2019.

percentage of each surveyed population that responded that the identified student behaviors were prevalent in the district.

Additionally, during school years 2017–18 and 2018–19, incidents of student suicide and attempted suicide affected the district. In interviews, staff reported a recent increase in incidents of student self-harm. Staff also noted that many students seemed to lack the coping skills to manage their emotions.

Until school year 2019–20, Brownfield ISD had six counselors. Bright Beginnings Academic Center, Colonial Heights Elementary, Oak Grove Elementary, and Brownfield Middle School each has one counselor on campus. Brownfield High School has two counselors that each support two grade levels. In addition to performing group, individual, and educational counseling, counselors coordinate state testing; coordinate gifted and talented testing; manage student accommodation plans pursuant to the federal Rehabilitation Act, Section 504; and conduct dyslexia testing. Some

counselors have additional duties, such as the ESL coordinator role. **Figure 2–7** shows the additional responsibilities of the two high school counselors.

Counselors said that they spend much of their time on these other requirements. The high school counselors reported that they spend approximately 10.0 percent to 20.0 percent of their time counseling students individually or in groups. Counselors also reported that other responsibilities often make it difficult to attend training.

The district developed a new social and emotional learning (SEL) counselor position for school year 2019–20 to serve all Brownfield ISD campuses. The SEL counselor focuses on developing students' emotional and social skills through discussion, stories, and interactive activities. The counselor uses the Collaborative for Academic, Social, and Emotional Learning (CASEL) framework, which focuses on self-awareness, self-management, social awareness, relationship skills, and responsible decision making. The district does

FIGURE 2–7
BROWNFIELD ISD HIGH SCHOOL COUNSELOR RESPONSIBILITIES
SCHOOL YEAR 2019–20

SHARED HIGH SCHOOL COUNSELOR RESPONSIBILITIES		JUNIOR/SENIOR COUNSELOR RESPONSIBILITIES	FRESHMAN/SOPHOMORE COUNSELOR RESPONSIBILITIES
Gifted and talented program coordinator	Homebound or PRS placement	District testing coordinator	Campus testing coordinator
504 placements	Homeless identification	Dual credit	Failure/parent conferences
PLAN testing	At-risk placement	Scheduling	Correspondence courses
PSAT testing	Career planning	TSI testing	Grade eight tours
Counsel students	Classroom presentations	IGC coordinator	BEC counselor
Crisis counseling	Coordinate military conferences	CTE coordinator	
ESL placement	Cumulative folders		
Evaluate transcripts			

NOTE: 504 placement=student accommodation plans related to Rehabilitation Act, Section 504; PLAN=Pre-ACT college readiness and entry examination; PSAT=Preliminary SAT college readiness and entry examination; ESL=English as a Second Language; PRS=Pregnancy Related Services; TSI=Texas Success Initiative; IGC=Individual Graduation Committees; CTE=career and technical education; BEC=Brownfield Education Center.
SOURCE: Brownfield High School Teacher Handbook and Survival Guide, school year 2019–20.

not require the counselor to use a specific SEL curriculum. Although the CASEL framework offers some guidance, the SEL counselor reported also using online content. The counselor spends provides classroom lessons for a week at a time on each campus to students in prekindergarten to grade 5 and conducts individual sessions with students in other grades that have been identified by campus staff as needing guidance.

The district does not have a job description for the SEL counselor and has not established metrics that would determine success for the position. The SEL counselor reports to the assistant superintendent, who said that the district has not determined how it will evaluate this position, but that it had considered performing surveys on each campus to gather information about the counselor's performance.

In addition to counselors, the district has a licensed specialist in school psychology (LSSP). The LSSP works exclusively with the Special Education Department, primarily assessing students that may need certain special education accommodations. Although the LSSP is trained to work with all students and to counsel or assess them for various needs, the LSSP does not work with students at risk for self-harm nor train teachers regarding student behavior management or suicide prevention. Although staff expressed interest in the possibility of coordination between the SEL counselor and the LSSP, that collaboration is not an expectation of their roles.

According to the district's secondary student handbook for middle school and high school students, "The district is committed to partnering with parents to support the healthy mental, emotional, and behavioral development of its students." The handbook refers students and parents to the Texas Suicide Prevention or National Suicide Prevention Lifeline. Additionally, the district has a form on its website for staff, community members, or students to report bullying anonymously. However, the review team found this form only through the search function. It was not posted on the district website's Bully Prevention page, which was blank at the time of the review. The district's Multihazard Emergency Operations Plan specifies how the district should respond to a student suicide, but it does not guide teachers regarding how to help students that indicate the intent to self-harm.

Staff said that when a student indicates a desire to self-harm, staff request an assessment by My Health My Resources (MHMR), a mental health network that serves the Brownfield

community. MHMR determines the seriousness of the incident and advises the district. However, staff that reported the need to refer students to MHMR were not aware of a communication from the district mandating that response. In addition, staff said that they lack the training to identify students that exhibit suicidal behaviors. The Texas Education Code, Section 21.451 (d)(3), requires school districts to provide suicide prevention training to educators; however, the district's professional development calendars did not include suicide prevention training. Additionally, staff reported being unaware of a specific policy or procedure to follow in responding to these incidents. No policy was available to view on the district website or in staff handbooks, and district staff did not mention such a policy in related interviews. The substitute handbook for temporary staff or instructors also did not address the issue.

The American Foundation for Suicide Prevention has developed the Model School District Policy on Suicide Prevention: Model Language, Commentary, and Resources. This document contains a clearly articulated purpose and scope for a district suicide prevention plan and model language for each part of a complete plan. It provides policies for school districts to follow to ensure that they notify parents and involve them in the response. The document also identifies ways for school districts to support students that have harmed themselves when they re-enter their campuses and how a district can support its students and community after a suicide.

The National Association of School Psychologists (NASP) notes that it is important for staff and students to watch for risk factors and warning signs in student behavior and that the "entire school staff should work to create an environment where students feel safe sharing such information." NASP notes that counselors and mental health staff "conduct suicide risk assessment, warn/inform parents, provide recommendation and referrals to community services, and often provide follow up counseling and support at school."

Austin ISD has a robust SEL department that includes a strategic plan, a developed mission and vision for the program, and an implementation guide. The district has incorporated questions about taught SEL skills into surveys for students and teachers to determine the support for the teaching and learning of these skills. Additionally, the district compares the response of students to disciplinary records to determine the efficacy of these skills in assisting students through behavioral issues.

Highland Park ISD adopted the Hope Squad program as a way to combat student suicide. Hope Squad is a school-based peer support program that empowers selected students to improve the school environment. The district trains Hope Squad students to recognize whether they or their peers are at risk for suicide and to encourage peers to seek help from trusted adults.

Brownfield ISD should clarify the roles of counselors, teachers, and other staff to provide better suicide prevention and intervention and social and emotional learning services to students.

The superintendent should assess the roles and responsibilities of district and campus staff to determine whether realigning duties could assist students better with their social and emotional needs. The superintendent should evaluate the roles of the campus counselors, the SEL counselor, and the LSSP to determine whether a different staff could assume the role of testing coordinator. If the district can reassign these responsibilities, the counselors would have more time to provide individual counseling and crisis counseling for students.

The superintendent should define the expected roles and responsibilities of the SEL counselor, including developing an evaluation rubric that is aligned with the district's vision for the role. The district should consider adopting a clearly articulated curriculum for this role to evaluate and assess its success fairly.

The district should refine the LSSP position to train teachers how to respond to students' expressed desire to self-harm, and to develop a consistent districtwide response to these incidents. The district also should assess whether the LSSP has the bandwidth to evaluate students that rejoin their campuses after assessment by MHMR.

Finally, the superintendent should coordinate with the technology staff to post the anonymous bullying report form on the website, along with all the district's resources for combating suicide and promoting healthy emotional and social learning.

The district could implement this recommendation with existing resources.

STAFFING ALLOCATION (REC. 8)

Brownfield ISD has not evaluated teaching and support staffing levels and assignments to determine whether services are sufficient to meet student needs.

FIGURE 2–8
BROWNFIELD ISD STUDENT-TO-TEACHER RATIOS SCHOOL YEARS 2016–17 TO 2018–19

LOCATION	2016–17	2017–18	2018–19
Brownfield ISD	**13.7**	**13.2**	**13.8**
Kermit ISD	15.8	16.2	17.8
Bishop Consolidated ISD	15.1	15.5	14.5
Littlefield ISD	14.2	14.0	14.1
West Oso ISD	14.4	14.3	14.0
State average	15.1	15.1	15.1

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

A staffing allocation model is an assistive tool for organizations to determine the number of staff needed to perform specific tasks satisfactorily. According to district staff, Brownfield ISD does not use a staffing allocation model to determine campus staff levels. The chief financial officer (CFO) said that the district has a goal to keep student-to-teacher ratios at the elementary campuses at less than 22 to 1, but the district has no other associated guidelines. The CFO stated, and principals confirmed, that when campus and district leadership teams meet to discuss campus staffing needs, they focus on whether the position can be funded, not on expected enrollment growth.

Brownfield ISD has a lower student-to-teacher ratio than the state average, and a lower ratio than each of the four peer districts selected by the review team. Peer districts are districts similar in size and other characteristics to Brownfield ISD that are used for comparison purposes. The review team selected Bishop Consolidated ISD, Kermit ISD, Littlefield ISD, and West Oso ISD as peer districts for Brownfield ISD. **Figure 2–8** shows the student-to-teacher ratios in Brownfield ISD, peer districts, and the state averages, for the past three school years.

During focus groups, teaching staff did not report a perception that the district is staffed inappropriately in either direction. Administrative staff expressed an awareness that some areas may not be staffed appropriately, but stated that the district arrives at staffing decisions by assessing the previous year's staffing levels and determining whether needs have changed through informal communications with campus-level staff.

Brownfield ISD's one librarian position is located on the middle school campus and provides support to the other campuses. The librarian stated that

FIGURE 2–9
REGIONAL EDUCATION SERVICE CENTER I'S SAMPLE ELEMENTARY SCHOOL STAFFING ALLOCATION MODEL
SCHOOL YEAR 2016–17

POSITION	ALLOCATION	ENROLLMENT OR SIZE
Professional Staff		
Principal	1.0	
Assistant Principal	0.5 up to 749 and 0.5 per additional 250 students	500–749
Counselor	0.5 up to 499 and 0.5 per additional 250 students	1–499
Librarian	0.5 per 250 students	1–249
School Nurse	District must have 1.0 registered nurse (RN) position; TASB recommends 1.0 RN position for every 5.0 licensed vocational nurse positions (1)	1–750
Teacher (Non-Special Education)	1.0	22 for kindergarten to grade 4; 25 for grades 5 to 6
Support Staff		
Campus Secretary	1.0	
PEIMS/Attendance Clerk (1)	1.0	
Office Clerk	1.0	750 or greater
Instructional Aide	1.0	1–75
Custodian	1.0	18,000 square feet to 20,000 square feet

NOTE: (1) PEIMS=Public Education Information Management System; TASB=Texas Association of School Boards.
SOURCE: Regional Education Service Center I, school year 2016–17.

paraprofessional staff that have other primary duties staff the libraries on other campuses. Additionally, the district employs two registered nurses (RN) for school year 2019–20; previously the district employed one RN position. Three licensed vocational nurse positions, overseen by RNs, are officed at Bright Beginnings Academic Center, Oak Grove Elementary, and Brownfield Middle School.

During interviews, several support staff said that they recorded Public Education Information Management System (PEIMS) data in addition to their main duties. The migrant coordinator, which monitors and supports migrant students in the district, tracks PEIMS data related to these students. Special education staff record PEIMS data for students enrolled in the special education program. Counselors reported handling and tracking PEIMS data and receiving training for this role.

Failure to account for enrollment trends or standard minimum staffing levels makes a district vulnerable to spending funds to overstaff some areas and having insufficient funds to staff other positions. This practice could result in some positions taking on additional responsibilities unrelated to their primary focus.

Regional Education Service Center I (Region 1) has developed sample staffing allocation models for districts to use when determining the necessary staffing levels at their campuses. These models consider specific needs at different campus levels, such as an increased need for counseling and library support in middle school and high school.

Figure 2–9 shows the sample staffing allocation model for elementary school campuses. **Figure 2–10** shows the Region 1 sample staffing allocation model for middle school campuses. **Figure 2–11** shows the Region 1 sample staffing allocation model for high school campuses.

Brownfield ISD provided a list of staff by function and campus for school year 2018–19, but not for school year 2019–20. **Figure 2–12** shows Region 1's best practice staffing model compared to Brownfield ISD's staffing levels indicated in its staff list.

The comparison indicates that Brownfield ISD employs more teaching positions than the staffing model, with fewer other professional staff positions such as librarians and nurses than the model. The district also appears to understaff support positions with fewer PEIMS/attendance clerks, office clerks, and registrars than the model suggests. Without

FIGURE 2–10
REGIONAL EDUCATION SERVICE CENTER I'S SAMPLE MIDDLE SCHOOL STAFFING ALLOCATION MODEL
SCHOOL YEAR 2016–17

POSITION	ALLOCATION	ENROLLMENT OR SIZE
Professional Staff		
Principal	1.0	
Assistant Principal	0.5	250–499
Counselor	0.5	1–250
Librarian	1.0 and an additional 1.0 after 1000 students enrolled	250–999
School Nurse	District must have 1.0 registered nurse (RN) position; TASB recommends 1.0 RN position for every 5.0 licensed vocational nurse positions (1)	1–750
Teacher (Non-Special Education)	1.0	25
Support Staff		
Campus Secretary	1.0	
PEIMS/Attendance Clerk (1)	1.0	
Office Clerk	1.0	750 or greater
Instructional Aide	1.0	1–75
Custodian	1.0	18,000 square feet to 20,000 square feet

NOTE: (1) PEIMS=Public Education Information Management System; TASB=Texas Association of School Boards.
SOURCE: Regional Education Service Center I, school year 2016–17.

FIGURE 2–11
REGIONAL EDUCATION SERVICE CENTER I'S SAMPLE HIGH SCHOOL STAFFING ALLOCATION MODEL
SCHOOL YEAR 2016–17

POSITION	ALLOCATION	ENROLLMENT OR SIZE
Professional Staff		
Principal	1.0	
Assistant Principal	0.5	250–499
Counselor	1.0	1–250
Librarian	1.0 and an additional 1.0 after 1000 students enrolled	250–999
School Nurse	District must have 1.0 registered nurse (RN) position; TASB recommends 1.0 RN position for every 5.0 licensed vocational nurse positions (1)	1–750
Teacher (Non-Special Education)	1.0	25
Support Staff		
Campus Secretary	1.0	
Registrar	1.0	
PEIMS/Attendance Clerk (1)	1.0	
Office Clerk	1.0	
Bookkeeper	1.0	
Instructional Aide	1.0	1–75
Custodian	1.0	18,000 square feet to 20,000 square feet

NOTE: (1) PEIMS=Public Education Information Management System; TASB=Texas Association of School Boards.
SOURCE: Regional Education Service Center I, school year 2016–17.

FIGURE 2–12
REGIONAL EDUCATION SERVICE CENTER I STAFFING MODEL VERSUS BROWNFIELD ISD'S ACTUAL STAFFING ANALYSIS
SCHOOL YEAR 2018–19

POSITION	BRIGHT BEGINNINGS ENROLLMENT=155		COLONIAL HEIGHTS ENROLLMENT=231		OAK GROVE ENROLLMENT=498		BROWNFIELD MIDDLE SCHOOL ENROLLMENT=361		BROWNFIELD HIGH SCHOOL ENROLLMENT=458		DIFFERENCE BY POSITION
	MODEL	ACTUAL	MODEL	ACTUAL	MODEL	ACTUAL	MODEL	ACTUAL	MODEL	ACTUAL	
Principal	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	0.0
Assistant Principal	0.0	1.0	0.0	0.0	0.5	1.0	0.5	1.0	0.5	2.0	3.5
Counselor	0.5	0.0	0.5	1.0	0.5	1.0	1.0	1.0	1.0	2.0	1.5
Librarian	0.0	0.0	0.5	0.0	1.0	0.0	0.5	1.0	0.5	0.0	(1.5)
School Nurse	1.0	1.0	1.0	0.0	1.0	1.0	1.0	1.0	1.0	1.0	(1.0)
Teacher	15.5	11.0	12.8	17.0	24.9	37.0	18.1	28.0	22.9	39.0	37.8
Campus Secretary	1.0	4.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	3.0	5.0
PEIMS/ Attendance Clerk (1)	1.0	0.0	1.0	0.0	1.0	1.0	1.0	1.0	1.0	1.0	(2.0)
Office Clerk	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.0	(1.0)

NOTE: (1) PEIMS=Public Education Information Management System.
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, school year 2018–19; Regional Education Service Center I, school year 2016–17.

an accurate staffing allocation model based on best practices, the district may not be aware of inequitable staffing levels.

Although districts experience benefits to staffing more teachers, including smaller class sizes and individualized instruction, these benefits should lead to an improvement in student performance. Brownfield ISD's teacher-to-student ratio, which is lower than all its peer districts and the state average, has not led to an increase in student performance.

Regional Education Service Centers provide assistance to school districts in planning to meet changing student needs. For example, Region 1 has developed staffing guidelines for special education programs with specific needs, shown in **Figure 2–13**.

Brownfield ISD should develop a campus staffing allocation model based on best practices and guidelines that meet student needs.

To accomplish this recommendation, Brownfield ISD should use industry staffing standards as a model to develop staffing guidelines that fit the needs of its students. The business manager and the superintendent should develop a process to integrate staff planning into regular annual planning with campus staff. Staff should reevaluate staffing assignments as a part of a full district plan and maximize staffing to meet student needs. The evaluation should

consider required positions, campus staffing allocations, and the additional responsibilities of nonteaching staff. District leadership should assess enrollment trends and educational trends, such as dual-credit classes, to forecast the district's needs.

The district could implement this recommendation with existing resources.

DISCIPLINARY ALTERNATIVE EDUCATION PROGRAM (REC. 9)

Brownfield ISD's Disciplinary Alternative Education Program does not meet students' behavioral and instructional needs.

Brownfield ISD's Disciplinary Alternative Education Program (DAEP) is located in the district's central office building. The DAEP provides services for students whose behavior violates the Brownfield ISD student code of conduct. During school year 2018–19, the DAEP served 98 students from Brownfield High School, Brownfield Middle School, and Oak Grove Elementary.

The DAEP has two instructors overseen by a principal, who has an assistant. The principal also serves as an assistant principal at Oak Grove Elementary. The DAEP reportedly shares a counselor with the high school campus. The district provides program uniforms for the staff and students.

FIGURE 2–13
REGIONAL EDUCATION SERVICE CENTER I'S SPECIAL EDUCATION SAMPLE STAFFING GUIDELINES
SCHOOL YEAR 2016–17

Factors for consideration:

- districts must provide a continuum of services;
- individual needs are determined by admission, review, and dismissal committee;
- services are to be provided in the least restrictive environment;
- increase services in the general education classroom requiring collaboration;
- students must have access to the general curriculum;
- levels of support vary per individual student;
- gender may be a factor when student needs include behavioral restraint or personal care;
- individual education plan meetings and data management;
- transition of preschool students age 3 that have disabilities into public school; and
- indirect services, including medical management, case management, parent training, and teacher training.

PROGRAM AND SERVICES	STAFFING FORMULA	PER	WEIGHT
Preschool Program for children with disabilities	1 professional and 1 paraprofessional	6 students per session, half-day or full day	
Elementary school, kindergarten to grade 5			
Mainstream/inclusion resource	1 professional	Campus enrollment of 300; adjust per district special education percentage	
Life skills, self-contained	1 professional and 1 paraprofessional	8 students	
Behavior unit	1 professional and 1 paraprofessional	6 students	
Middle school, grades 6 to 8			
Mainstream/inclusion resource	1 professional	Campus enrollment of 250	
Life skills, self-contained	1 professional and 1 paraprofessional	10 students	
Behavior unit	1 professional and 1 paraprofessional	6 students	
High school			
Mainstream/inclusion resource	1 professional	Campus enrollment of 250	
Life skills, self-contained	1 professional and 1 paraprofessional	12 students	
Behavior unit	1 professional and 1 paraprofessional	6 students	

SOURCE: Regional Education Service Center I, school year 2016–17.

The district has purchased the Student Transition and Recovery Program (STAR) to administer the DAEP. Staff interviews and the STAR website describe the program as a "military style drill and exercise program in an educational environment." Included in the system is assistance with program implementation, training, and hiring of staff to supervise the program. Through the DAEP program, staff lead students in rigorous physical exercise throughout the school day. Instructors in the program estimated that about 60.0 percent of the students' day is committed to academics and 40.0 percent is committed to athletic or drill-based activities.

Students that enter the DAEP program begin with daily general calisthenics before conducting their academic studies. Students receive assignments from their home campus teachers, and DAEP instructors can access these assignments through Skyward, the district's student information system. Students also have access to some educational programs on DAEP computers. Between subject transitions, students run laps and perform other drills. Before lunch, students exercise at a field house, and after lunch they return to academics with occasional breaks for running laps and drills.

The district currently does not have a formal process to ensure that students receive adequate and aligned instruction while at the DAEP campus. The district has no process for minimizing disruption to educational goals in the reintegration of the student into their home campus. The DAEP campus does not include any type of restorative justice program or systematic SEL instruction to decrease the likelihood that the student will return to the DAEP.

DAEP instructors are former military personnel that do not hold teaching certificates. The district does not train DAEP staff to assist students with instruction. Instructors stated that students typically work on their assignments on their own. According to the DAEP principal, campuses are supposed to share instructional staff with the program through an informal agreement. However, with no formal schedule for this arrangement, certified teachers do not provide instruction in the program regularly. DAEP instructors have access to Skyward, which includes student assignments. Staff reported not knowing whether they had access to individualized education plans for students served by special education, nor how they would implement these plans.

The DAEP principal and instructors said that the district plans to discontinue the STAR program, but they gave conflicting information about how and when the district would do so. The DAEP principal said that the district was terminating the program and transitioning to a less structured system; however, DAEP instructors reported that the program was becoming more structured. Instructors expressed the understanding that the district would continue using the program's name and policies as a part of an agreement, contingent upon the district maintaining the general structure of the program. The principal reported not having a formal plan for the DAEP after the district removed itself from the STAR program.

The DAEP serves any student that the district determines has committed a mandatory or discretionary infraction, including elementary students. The DAEP principal said that the campus has received a decrease in the number of elementary students referred there during the past year. Additionally, staff said that they separate elementary students from older students by placing the former group with the principal's administrative assistant instead of requiring them to perform significant athletic activities or drills. However, the review team observed an incident that conflicted with this statement.

According to DAEP staff, campuses typically send students to DAEP for a 30-day period. Students that behave well in the program may be authorized to transition to their home campuses after 15 days within certain conditions. The district's transition procedure requires students to report to DAEP for workouts in the morning before attending their home campuses for academics and reporting again to DAEP at the end of the day for athletics. DAEP staff said that they assign more daily physical training to students that are not performing well academically during the transition period. The district has no process for communication between DAEP and the home campus about student behavior, nor does it have a process to follow up with students that have re-entered their home campuses.

Aside from physical training, DAEP staff do not engage students in behavior modification or discuss appropriate classroom behavior. The DAEP principal stated that the DAEP shares a counselor with the high school; however, the counselor did not list the DAEP as one of the position's responsibilities, and the counselor reportedly does not make regular visits to the program's campus. DAEP staff also noted that the SEL counselor comes to their campus "as needed." The district has no formal schedule for the SEL counselor to visit the DAEP campus, nor did it identify situations when the SEL counselor should visit the campus.

The DAEP program does not have a process to teach students behavior management skills and improve their outcomes when they return to their campuses. Additionally, the program does not have certified teachers, and approximately 40.0 percent of the students' time is committed to athletics and physical training instead of instructional learning, potentially leaving students academically unprepared to keep up with their peers when they return to their home campuses. The effects of this program are not immediately discernible because the program does not perform follow-up evaluations with students after they leave the DAEP.

The National Alternative Education Association (NAEA) is a volunteer organization that provides information sharing and professional development, best practices, and advocacy for alternative education programs such as DAEPs. Its 2014 publication, Exemplary Practices in Alternative Education: Indicators of Quality Programming, includes the following best practices:

- an exemplary nontraditional or alternative education school develops a guiding vision and mission that drives the overall operation of the program;

- the school culture and climate are characterized by a positive rather than punitive atmosphere for behavioral management and student discipline;

- teachers are highly qualified in the content area based on individual state standards;

- curricular options reflect, but are not limited to, those offered in the traditional educational setting;

- teachers identify and provide appropriate instruction designed to close gaps in student learning;

- differentiated instructional strategies are employed to accommodate for students with different backgrounds, individual learning styles (e.g. visual, auditory, and kinesthetic learners), and multiple intelligences;

- instruction integrates life skills (e.g., career preparation, citizenship, conflict resolution, decision-making skills, problem solving, public speaking, self-management, social skills, teamwork, time management, etc.) into the curricula and affords the student with opportunities to put the acquired skills into action; and

- small group lessons in concert with project-based learning are used to build social relationships by supporting collaboration and teamwork.

The NAEA also has a rubric for assessing an alternative education program to determine how well it is following these best practices.

Brownfield ISD should assess the Disciplinary Alternative Education Program's ability to meet students' behavioral and academic needs.

Brownfield ISD's superintendent, in coordination with the DAEP principal, should assess the DAEP's processes and procedures, aligning them with best practices such as those promulgated by the NAEA. For example, unlike the program operated by the district's DAEP, which takes punitive approach to behavior modification, best practices focus instead on providing restorative justice and using problem-solving techniques.

The superintendent, in conjunction with principals and other appropriate staff, should develop a mission for the DAEP with clearly articulated goals and success metrics. District staff should determine these metrics, which could include recurring evaluations of behavior in returning students, or assessing the likelihood of recidivism in students. The superintendent should develop procedures consistent with the goals. Additionally, district staff should determine the necessary staff requirements at the DAEP, including whether to staff the program with certified teachers trained in behavior management and SEL, or how visits from the SEL counselor might help to meet students' SEL needs. The superintendent should present the plan to the Brownfield ISD Board of Trustees (board) for approval.

The district could implement this recommendation with existing resources.

BEHAVIOR MANAGEMENT (REC. 10)

Brownfield ISD does not have a consistent districtwide behavior management plan.

According to district staff, Bright Beginnings Academic Center, Colonial Heights Elementary, and Oak Grove Elementary use the Positive Behavioral Interventions and Supports (PBIS) model. PBIS encourages establishing campus rules in a concise, clear, and memorable way, including staff reinforcement of students' good behavior.

Beginning in school year 2019–20, the district has employed an at-large SEL counselor that provides group classes regarding behavior and social learning on the elementary campuses. The SEL counselor meets individually with middle school and high school students that campus staff have identified as needing additional support.

Although the district and campus principals reported using PBIS for elementary programs, elementary teachers in a focus group reported being unfamiliar with PBIS and stated that their campuses did not use it. Elementary staff reported that behavioral problems were prevalent on their campuses and that teachers had few supports in classroom management. Staff identified the new SEL counselor as helpful, but expressed the need to have more than "just one person" in this districtwide role.

The middle school and high school campuses do not have widely implemented positive behavior management systems such as PBIS. The district uses Project Wisdom, a character education program that provides educator materials online. However, the only aspect of the program that staff identified as being followed consistently on campuses was the daily intercom broadcast, which encourages students to be their "best." Additionally, some staff stated that the middle school and high school campuses are implementing Habitudes, a leadership curriculum for students. However, these character-building lessons are offered in the same period that the district has added a tutoring block to assist middle school and high school students that need additional academic support. As a result, students that need additional support might not able to participate in the character-based curriculum.

At the middle school and high school levels, teachers reported that discipline is a recurring problem. Many teachers stated that current interventions have not succeeded in changing student behavior. Students that violate the student code of conduct at the middle school and high school campuses may receive in-school suspensions (ISS) or out-of-school suspensions (OSS). In addition, these students may be assigned to the DAEP campus or may be expelled. Staff said that the district has little communication or follow-up regarding disciplinary issues, and that the campus leaders are not consistent in their discipline philosophy. Staff that maintain the ISS classrooms said that they are not notified of the reasons that campus leaders have referred students to their classrooms. Students do not receive counseling or behavior training in ISS, and instead complete academic work independently while in ISS.

Brownfield High School's staff handbook includes a section regarding classroom discipline, which describes the general learning expectations for students, punishment levels for tardy arrivals, dress code violations, and minor or major offenses. It also includes a section that describes acceptable consequences for general or significant misconduct, ranging from a simple oral correction to corporal punishment or assignment to the disciplinary campus. The document contains no guidance regarding the application of these consequences. It leaves to the discretion of individual teachers whether the same infraction might be punished with an oral correction in one instance and with detention in another. Other campuses did not have a staff handbook.

More than half of parents and Brownfield ISD staff that responded to a review team survey indicated that behavioral problems related to drugs and alcohol were prevalent in the district. More than 30.0 percent of campus staff and parents said they believed that physical violence and fights were a prevalent behavior issue, and more than 50.0 percent of district staff said they believed it to be prevalent.

The district does not track or analyze disciplinary data adequately to improve classroom management. Although the district records disciplinary incidents, it does not gather the data necessary to determine where it can target professional development best. The district does not track at the campus or district level which teachers send students to the DAEP, ISS, or OSS. Without that information, the district cannot determine whether some teachers rely too heavily on outside disciplinary methods instead of effective classroom management.

DAEP staff reported that home campuses often referred students for issues that teachers could have handled effectively in the classroom. Teachers in focus groups said that some teachers are unable to manage their classrooms effectively without relying on outside disciplinary actions. District staff expressed a concern that exclusionary discipline is overused.

The district LSSP works primarily with the special education staff and students, and does not assist teachers and students with disciplinary issues or the district with developing a behavior management program. The LSSP said that 50.0 percent of the role is performing special education evaluations on students, 35.0 percent is counseling intervention for special education students, and 15.0 percent is consulting with staff and parents regarding students' special education eligibility.

Failure to address negative student behavior throughout the district disrupts instructional effectiveness. The lack of data and analysis for discipline trends in the district prevents campus and district leadership from targeting professional development and coaching effectively to ensure that teaching staff have comprehensive classroom management skills. Best practices indicate that a poorly managed classroom results in a loss of instructional time and rigor.

Student behavior and discipline management can affect campus climate across the district. Effective districts establish clear expectations regarding student behavior and consistently enforce consequences for undesirable behaviors, resulting in a climate that supports effective instruction. Campuses and students benefit when districts establish clear and concise behavior management systems, align disciplinary procedures to the student code of conduct and student handbooks, and reinforce behavior expectations in other student-related district services, such as transportation and extracurricular activities.

Brownfield ISD should develop and implement a consistent districtwide behavior management system that includes staff support and data analysis.

To accomplish this recommendation, the assistant superintendent should determine a discipline philosophy and a behavior management plan for the district and implementation steps for each campus. The assistant superintendent should determine how best to establish commitment from teaching staff for the plan's implementation and assess the plan's success continuously by analyzing discipline data. If the assistant superintendent observes changes in the district's discipline trends–such as a teacher originating a disproportionate number of exclusionary discipline cases, or that the district no longer follows its discipline philosophy–the assistant superintendent should provide recommendations for resolving the issue to the superintendent and campus leadership. The district should use existing staff expertise to address classroom management. The SEL counselor and the LSSP are valuable resources for teachers to improve classroom management skills.

The district could implement this recommendation with existing resources.

ENGLISH LEARNERS (REC. 11)

Brownfield ISD does not offer a comprehensive program to meet the instructional needs of students identified as English learners.

During school year 2018–19, Brownfield ISD identified 7.8 percent of its students as EL. The Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter BB, Section 89.1203(7), defines an EL student as one that is acquiring English and has another primary language. **Figure 2–14** shows the population of EL students at Brownfield ISD from school years 2016–17 to 2018–19 compared to the state average.

FIGURE 2–14
BROWNFIELD ISD ENGLISH LEARNER STUDENTS
SCHOOL YEARS 2016–17 TO 2018–19

YEAR	BROWNFIELD ISD	STATE AVERAGE
2016–17	8.3%	18.9%
2017–18	8.0%	18.8%
2018–19	7.8%	19.5%

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2018–19.

FIGURE 2–15
BROWNFIELD ISD ENGLISH LEARNER STUDENT
PERFORMANCE ON STATE OF TEXAS ASSESSMENTS OF
ACADEMIC READINESS, ALL GRADES
SCHOOL YEAR 2018–19

ASSESSMENT	ALL STUDENTS	ENGLISH LEARNERS
Approaches Grade Level or Above, All Subjects	61.0%	37.0%
Approaches Grade Level or Above, Reading	54.0%	26.0%
Approaches Grade Level or Above, Mathematics	70.0%	49.0%
Meets Grade Level or Above, All Subjects	30.0%	12.0%
Meets Grade Level or Above, Reading	26.0%	9.0%
Meets Grade Level or Above, Mathematics	37.0%	12.0%
Masters Grade Level, All Subjects	12.0%	3.0%
Masters Grade Level, Reading	10.0%	2.0%
Masters Grade Level, Mathematics	18.0%	6.0%

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

The performance of EL students at Brownfield ISD is lower than that of the district's overall student population in all categories. **Figure 2–15** shows STAAR performance results for EL students compared to Brownfield ISD's overall student population.

At the time of the review team's onsite visit, the district staffed its ESL coordinator position with a counselor. A principal had the position before school year 2019–20. According to the ESL coordinator, the district provides most EL students with ESL-certified teachers, including some that have waivers to teach outside their areas of certification due to shortages in the ESL teaching field. The district also provides students laptop computers that have an English

language-learning software installed. The ESL coordinator said that three of the campuses have pull-out small group programs for EL students; however, principals did not include these programs in a list of ESL programs on their campuses during a focus group. The district does not have teacher aides for ESL program classes. During onsite interviews, many staff confused the district's migrant program with the ESL program and reported not knowing that they were two different programs.

After a student is registered, the district identifies a student as EL through a home language survey. If the survey indicates that further action is needed, the district tests the student and submits the results to the campus-based Language Proficiency Assessment Committee (LPAC). If the LPAC determines that a student needs ESL services, staff request permission from parents to place the student in the program. The district does not place all its EL students with an ESL-certified teacher. The district encourages teachers to obtain ESL certification and reimburses teachers for passing the exam. Teachers reported being uncertain of the requirements for the ESL program, and one staff stated that a campus did not have an ESL program.

The district's District Improvement Plan (DIP) for school year 2019–20 did not include goals for EL students, other than continuing the existing identification process. Brownfield ISD's school year 2018–19 DIP identifies that 80.0 percent of EL students did not score at or greater than grade level in all core subjects. The district identified this low core subject scoring as an issue and determined that its root cause was that "research based curricula, instructional materials, educational software, and assessment procedures for ELs has not been implemented." Additionally, the school year 2018–19 DIP identified EL students as a designated student group for improvement. The DIP set seven goals for the district to improve services to EL students, including a goal to "identify and provide all LEP (limited English proficient) students an appropriate ESL program that develops proficiency in comprehension, speaking, reading, listening, and composition in the English Language." The district reported that it had completed 15.0 percent of this goal by the end of the school year.

The district submitted an ESL Program Evaluation for school year 2018–19 to the review team. The district could not identify who had performed the evaluation, because both the current and former ESL coordinators reported being unfamiliar with the document. The district presented the document and a summary of the program to the board

during that school year. The document included several inaccuracies and some unsubstantiated best practices. For example, the report stated that, for grades 3 to 5 EL student scores in reading, math, and science were within 2.0 to 5.0 percentage points of the scores of non-EL students, and that this difference indicated that "students are provided equitable instructional practices for all campus-wide." A difference of 2.0 percentage points to 5.0 percentage points is not considered equitable within best practices. Additionally, the difference was greater among some sets of scores, including a difference of 13.0 percentage points between EL students and non-EL students in the grade level for science.

TEA has developed a website, txel.org, which provides guidance for school districts to meet the educational needs of EL students, students in bilingual education programs, and students receiving ESL services. This website connects school districts with resources such as the Language Proficiency Assessment Committee Framework Manual, which contains information for districts related to the legal requirements of LPACs, and training information for LPAC members. The manual also provides a unified source of information regarding state and federal requirements for ESL programs. Other TEA resources include the Limited English Proficient training Flowchart, which shows the process for identifying LEP students and entering their data into the district's ESL program. TEA and the Regional Education Service Center XVII (Region 17) have multiple resources to assist Brownfield ISD in developing a quality program for its EL students.

TEA also has published a resource titled Best Practices for English Language Learners, which includes specific strategies for teachers in classrooms that accommodate EL students. These strategies include establishing positive classroom climates, heterogeneous grouping, language-level grouping, balanced literacy approaches, higher order thinking skills, language development, literacy development, sheltered instruction, guided writing, using manipulatives, and formative and summative assessments.

Brownfield ISD should improve the English as a second language program and evaluate the program to ensure that it meets English learner students' needs.

The district should identify the specific job responsibilities of the ESL coordinator. The superintendent, in collaboration with stakeholders and relevant staff, should analyze the district's ESL program, then develop and implement procedures for the program. As part of this effort the group should perform the following actions:

- set clear expectations for the program, including student identification and evaluation of success metrics;

- develop and implement guidelines for the ESL program, including the services that the program will provide and expectations for ESL teachers in the classroom;

- establish a staffing model to assure that the district has sufficient teachers and other staff to deliver the service level that the district has determined will match EL students' needs;

- evaluate the district's available ESL resources and determine needed resources;

- establish a funding method to purchase materials to support ESL students' educational needs, and provide staff training on appropriate sources of funding for this purpose; and

- establish a method to evaluate the program's implementation regularly.

Finally, the group of the superintendent, stakeholders, and staff should compile and present its recommendations to the board.

The district should collaborate with Region 17 to assist the district in implementing the group's recommendations. The ESL team at Region 17 can provide assistance in ESL program administration, developing effective language programs, instructional strategies for ESL students, curriculum modifications for ESL programs, and additional services as needed.

The district could implement this recommendation with existing resources.

GIFTED AND TALENTED PROGRAM (REC. 12)

Brownfield ISD does not offer a comprehensive program to meet the instructional needs of students identified as gifted and talented.

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." TEA has delineated the requirements of gifted and talented programs within districts and nonrequired actions that are

considered "exemplary" in the Texas State Plan for the Education of Gifted/Talented Students.

The district did not provide examples requested by the review team of relevant identification procedures, plans, or curriculum for gifted and talented students. The district provided a list of teachers that have gifted and talented teaching certifications. However, this list did not appear to represent staff that currently teach in campus gifted and talented programs. At the time of the review team's onsite visit, several teachers certified to teach gifted and talented courses were not teaching; these individuals were working in other full-time roles. The review team could not determine how many teachers on the list are involved currently in providing services for gifted and talented students.

The district's school year 2019–20 and 2018–19 DIPs identified the need to "meet academic needs in identified programs for designated student groups" and identified gifted and talented students as a designated student group. The DIP identified five areas in which the district set goals to improve academic services for gifted and talented students, including providing an "advanced and challenging curriculum" and "encouraging parental involvement." According to data in the DIPs, the district had completed less than 50.0 percent of several of these goals by the end of both school years 2019–20 and 2018–19.

The assistant superintendent said that the district offered the gifted and talented program during school year 2018–19 as an afterschool activity for students identified by campus-level committees. The district removed the afterschool activities for school year 2019–20, and the assistant superintendent said that the gifted and talented program had been incorporated into the school day. Staff said that campuses provide enrichment activities for gifted and talented students as part of tutoring periods that occur during the school day.

Brownfield High School offers a leadership development curriculum to students during its tutoring period, called the Cub Seminar. The assistant superintendent said that this curriculum is available to all students, including those identified as gifted and talented. The high school principal said that this leadership development curriculum is all that is available to gifted and talented students. Brownfield Middle School has a similar, but shorter, school period for student interventions. The middle school principal said that staff use this time to provide enrichment for gifted and talented students, but that they did not have a specific

curriculum to support that goal. According to the principal, the campus encourages gifted and talented students to enroll in science, technology, engineering, and math classes, including recently added robotics and coding classes. Colonial Heights Elementary staff report providing high-achieving students with enrichment activities during an open period, but not providing curriculum or implementation steps. Oak Grove Elementary does not have a gifted and talented program, although the principal said that the campus plans to begin one.

Counselors said that staff provide more rigor in the classroom to students identified as gifted and talented. However, teachers said during focus groups that they were unaware of requirements for gifted and talented enrichment or programs for those students. According to some elementary teachers, an afterschool gifted and talented program existed previously, but the district terminated the program and did not replace it. Some secondary teachers said that the middle school and high school have no gifted and talented programs.

The assistant superintendent said that the selection process for the gifted and talented program begins in the fall, when district leadership inform teachers and parents through handouts and during meetings that students can be nominated for the program. During early spring, counselors collaborate with the gifted and talented committee on each campus to determine which students qualify for the program and begin the enrollment process. District leaders reported during multiple interviews that more students were eligible for the program than had been enrolled. The assistant superintendent said that the district is reevaluating its identification process. **Figure 2–16** shows the district's percentage of identified gifted and talented students compared to the state average.

According to the National Association for Gifted Children (NAGC), school districts across the U.S. identify 6.0 percent of their enrolled students as gifted and talented on average. The number of students identified by Brownfield ISD as gifted and talented is less than both the national and state averages and has decreased.

NAGC's gifted and talented programming guide for prekindergarten to grade 12 has standards in six areas: learning and development, assessment, curriculum and instruction, learning environments, programming, and professional development. NAGC states, "in planning for educational opportunities, school leaders must

FIGURE 2–16
BROWNFIELD ISD GIFTED AND TALENTED STUDENTS COMPARED TO STATE AVERAGE
SCHOOL YEARS 2016–17 TO 2018–19

YEAR	BROWNFIELD ISD	STATE AVERAGE
2016–17	5.1%	7.8%
2017–18	4.7%	7.9%
2018–19	4.2%	8.1%

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2018–19.

communicate a clear purpose and common goal that is endorsed by curriculum coordinators, classroom teachers, gifted resource specialists, counselors, and other district staff." Additionally, NAGC recommends that schools train classroom teachers to recognize students that could qualify for the gifted and talented programs.

NAGC also has developed a survey to assess a district's gifted and talented programming.

Brownfield ISD should develop and implement a comprehensive gifted and talented program to meet such identified students' instructional needs.

The assistant superintendent should analyze the district's programming to determine areas for improvement. The district should use NAGC's gifted programming standards guide to improve its gifted and talented programs. The assistant superintendent, in collaboration with relevant stakeholders and district staff, should perform the following actions;

- develop a gifted and talented program model for the district, including program standards, objectives, assessment and screening procedures, a plan for professional development, and an evaluation plan;

- solicit stakeholder input on the model;

- revise the model based on stakeholder input;

- submit the plan to the board for adoption;

- implement the adopted model;

- revise the model based on evaluation; and

- monitor and revise as needed.

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:

INCLUSION CLASSES

In focus groups, teachers reported that the district typically incorporates special education students into the general education classes through an attempt at following an inclusion model. However, staff noted that campuses frequently place most special education students in one or two general education classrooms. Although a special education aide periodically supports the general education teachers, staff said that general education teachers often struggle, even with support. The district should assess its special education practices to ensure that it is following a true inclusion model that supports general education teachers in teaching special education students.

MENTORSHIP PROGRAM

Teachers stated that new teachers receive support through the district's program called New Teacher Academy. This program is a two-day to three-day training at the beginning of the school year. Staff stated that the district previously had a mentoring program that it had discontinued. The district should consider implementing a new mentoring program to support teachers and to increase the attractiveness of the district to potential teaching staff.

FISCAL IMPACT

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

The Legislative Budget Board's 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 8** (staffing allocation), Brownfield ISD has the potential for savings if the district aligns the staffing levels with industry standards.

3. BUSINESS MANAGEMENT

Brownfield Independent School District's (ISD) Business Office conducts the majority of its finance-related functions. For fiscal year 2020, Brownfield ISD adopted a budget of $17,051,151.

The chief financial officer manages the district's cash and investments. Brownfield ISD also retains the services of an external financial adviser to help manage the district's investments, bonds, and debt service. The district obtains districtwide insurance coverages through the Texas Association of School Boards Risk Management Fund.

Brownfield ISD has a decentralized purchasing function, and each campus initiates purchases and receives goods and services. Campuses approve invoices for payment and then notify the Business Office. The superintendent approves contracts with an annual value of less than $50,000, and the Brownfield ISD Board of Trustees approves contracts valued at $50,000 or more.

ACCOMPLISHMENT

♦ Brownfield ISD ensures the timely and efficient processing of payroll and provides staff with convenient web-based access to payroll information.

FINDINGS

♦ Brownfield ISD's budget-planning process does not connect the districtwide budget to the district's goals and objectives and does not include strategic planning for the timing and spending of state and federal grants and allotments.

♦ Brownfield ISD does not use cash flow forecasts to ensure that adequate funds are available to meet the district's cash requirements.

♦ Brownfield ISD lacks a policy to manage its fund balance.

♦ Brownfield ISD lacks procedures to document investment management responsibilities and ensure the appropriate segregation of cash management duties from investment management duties.

♦ Brownfield ISD lacks adequate purchasing procedures for its decentralized purchasing function.

♦ Brownfield ISD lacks a clearly defined contract management function to ensure adequate administration and oversight of district contracts.

♦ Brownfield ISD lacks adequate charge card guidelines and does not follow or enforce existing guidelines consistently.

♦ Brownfield ISD lacks internal controls for campus-based cash handling.

♦ Brownfield ISD lacks procedures for the tagging, inventory, and disposal of district assets.

♦ Brownfield ISD's Business Office Procedures Manual lacks key elements to ensure consistency, accountability, and compliance with state and federal regulations.

♦ Brownfield ISD has not established a policy to rotate external auditors periodically.

RECOMMENDATIONS

♦ **Recommendation 13: Develop a proactive budget-planning approach to connect spending with identified needs and goals.**

♦ **Recommendation 14: Establish formal cash flow forecasting.**

♦ **Recommendation 15: Develop a policy to identify the level of fund balance the district will maintain in the general fund and evaluate the use of committed and assigned funds.**

♦ **Recommendation 16: Establish effective internal controls for investment management.**

♦ **Recommendation 17: Establish procedures to improve purchasing efficiency and ensure that staff apply appropriate purchasing methods in accordance with state and federal laws.**

♦ **Recommendation 18: Implement controls to improve contract management functions.**

♦ **Recommendation 19: Strengthen the district's charge card guidelines to include more detailed procedures and establish internal controls to comply with the guidelines.**

♦ **Recommendation 20: Improve oversight of campus-based cash handling.**

♦ **Recommendation 21: Develop and implement controls to manage district assets efficiently.**

♦ **Recommendation 22: Develop comprehensive procedures to guide the daily functions of the Business Office and ensure that financial management activities adhere to best practices.**

♦ **Recommendation 23: Implement measures to ensure that auditors perform the district's annual financial audit with objectivity and independence.**

BACKGROUND

An independent school district's business services functions include financial management, asset and risk management, and purchasing. Financial management involves administering the district's financial resources, budgeting, and planning for its priorities. Asset and risk management functions control costs by ensuring that the district adequately protects its assets against significant losses at the lowest possible cost. An independent school district's purchasing function provides quality materials, supplies, and equipment in a timely, cost-effective manner.

Financial management is dependent on a district's organizational structure. Larger districts typically have staff specifically dedicated to financial functions, and smaller districts have staff with multiple responsibilities. Budget preparation and administration are financial management functions that are critical to overall district operations. These functions include budget development and adoption; oversight of expenditures 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 software systems for school administration and provision of staff training.

Managing investments includes identifying those with maximum interest-earning potential while safeguarding funds and ensuring liquidity to meet fluctuating cash-flow demands. Forecasting and managing revenue include efficient tax collections to enable a district to meet its cash-flow needs, earn the highest possible interest, and estimate state and federal funding. Management of capital assets involves identifying a district's property (e.g., buildings, vehicles, equipment, etc.)

FIGURE 3–1
BROWNFIELD ISD BUSINESS OFFICE ORGANIZATION SCHOOL YEAR 2019–20
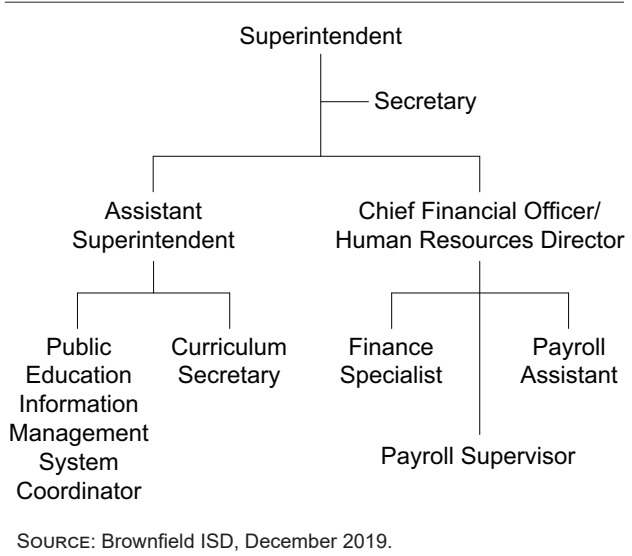
SOURCE: Brownfield ISD, December 2019.

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 effects. Risks can include investments, liabilities, capital assets, and insurance. Managing assets and risks is dependent on the organizational structure of the district. Larger districts typically have staff dedicated to asset and risk management, and smaller districts assign staff these responsibilities as a secondary assignment.

School districts in Texas 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, which is available as a resource for district purchasing.

Figure 3–1 shows the organization of Brownfield ISD's Business Office. The chief financial officer (CFO) reports to the superintendent and directs the operation of all financial and business affairs of the district, including accounting,

purchasing, and risk management, and serves as the chief financial adviser to the superintendent and Brownfield ISD Board of Trustees (board). The CFO also serves as the district's human resources director and oversees the recruitment, hiring, and retention functions of the district. The finance specialist processes accounts payable and records and maintains district financial transactions. The payroll supervisor processes the district's payroll. The payroll assistant assists with payroll verification and performs data entry for new staff benefits enrollment.

The assistant superintendent oversees compliance and program management of the district's federal and state grants. The Public Education Information Management System (PEIMS) coordinator reports to the assistant superintendent. The PEIMS coordinator supervises the work of the campus secretaries, attendance clerks, and registrars that enter student data into PEIMS. The curriculum secretary assists with accounts payable and administers districtwide trainings, processes travel for curriculum department staff, and enters purchase orders for supplies, textbooks, software, and technology. The superintendent's secretary enters requisitions, receives and processes invoices, monitors budgets, and performs other bookkeeping functions for the superintendent and for the director of maintenance and transportation.

The Legislative Budget Board's School Performance Review Team visited the district during December 2019. At the time of the review team's onsite visit, the CFO planned to leave employment at the district in December 2019. In January 2020, the finance specialist assumed the CFO's duties with the title of business manager, and the curriculum secretary transitioned to the finance specialist position. The payroll assistant assumed the curriculum secretary position.

Brownfield ISD uses a computer application called Skyward as its enterprise resource planning (ERP) system to conduct all of its financial accounting, payroll, and procurement functions. The ERP system's encumbrance control system prevents expenditures that exceed budgeted amounts and directs purchase requests to a preset list of approvals before the system issues a final purchase order and before the district pays invoices. The system also maintains electronic copies of supporting documentation.

For fiscal year 2020, Brownfield ISD's adopted budget is $17,051,151 with revenues of $16,771,217. The CFO stated that the district's practice is to budget conservatively for a deficit and to reserve funds for emergency needs. **Figure 3–2**

shows Brownfield ISD's actual financial data for school years 2015–16 to 2017–18 and budgeted financial data for school year 2018–19 for the general fund. The largest expenditure categories for each of these years are instruction, which accounted for 50.6 percent of the total operating expenditures in school year 2017–18, and plant maintenance and operations which accounted for 14.5 percent of total operating expenditures during the same year.

Peer districts are districts similar in size and other characteristics to Brownfield ISD that are used for comparison purposes. The review team selected four school districts, Bishop Consolidated ISD, Kermit ISD, Littlefield ISD, and West Oso ISD as peer districts for Brownfield ISD. **Figure 3–3** shows Brownfield ISD's actual operating expenditures compared to the peer district averages and the statewide averages for school year 2017–18. During this period, the district spent a smaller percentage of its total operating expenditures on instruction, instructional resources and media, guidance counseling services, and food service operation than the peer districts and statewide average for these categories. Brownfield ISD spent a greater percentage of its budget in the categories of school leadership, transportation, extracurricular, and general administration than the peer districts and statewide average.

School districts in Texas receive two financial accountability ratings, the School Financial Integrity Rating System of Texas (FIRST) and Smart Score. FIRST is the state's school financial accountability rating system 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 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. These ratings, which range from one star (low) to five stars (high), indicate a district's success in combining cost-effective spending with the achievement of measurable student academic progress. Smart Score rates 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 2019 Smart Score rating results use data from school years 2015–16 to 2017–18.

Figure 3–4 shows Brownfield ISD's FIRST and Smart Score ratings compared to peer districts. Brownfield ISD and three peer districts scored a FIRST rating of A/Superior for school year 2017–18. During school year 2018–19, Brownfield ISD

FIGURE 3–2
BROWNFIELD ISD GENERAL FUND FINANCIAL DATA, SCHOOL YEARS 2015–16 TO 2018–19

CATEGORY	2015–16 ACTUAL	2016–17 ACTUAL	2017–18 ACTUAL	2018–19 BUDGETED
Revenue				
Local Tax	$7,149,099	$5,657,894	$6,390,956	$6,836,650
Other Local and Intermediate	$261,675	$293,882	$384,617	$0
State	$7,390,606	$9,208,603	$9,667,650	$8,841,287
Federal	$270,872	$136,646	$628,782	$150,000
Total Revenue	**$15,072,252**	**$15,297,025**	**$17,072,005**	**$15,827,937**
Operating Expenditures (1)				
11 Instruction	$7,456,744	$7,252,286	$7,763,164	$7,696,824
12 Instructional Resources and Media	$195,790	$189,222	$152,090	$141,371
13 Curriculum and Staff Development	$225,692	$232,814	$213,313	$164,632
21 Instructional Leadership	$207,924	$196,232	$201,335	$271,197
23 School Leadership	$1,051,976	$1,112,497	$1,138,268	$1,150,754
31 Guidance Counseling Services	$290,624	$292,771	$313,300	$374,367
32 Social Work Services	$30,000	$30,001	$30,000	$31,000
33 Health Services	$237,600	$235,959	$242,210	$256,678
34 Transportation	$569,856	$411,840	$496,873	$559,996
35 Food Service Operation (2)	$0	$0	$0	$0
36 Extracurricular	$927,524	$998,803	$1,002,796	$1,034,708
41 General Administration	$922,454	$958,128	$967,314	$812,784
51 Plant Maintenance and Operations	$1,822,453	$1,895,287	$2,222,815	$2,043,538
52 Security and Monitoring	$142,873	$134,099	$125,886	$163,603
53 Data Processing Services	$442,732	$441,567	$463,749	$592,879
61 Community Services	$0	$0	$0	$0
Total Operating Expenditures	**$14,524,242**	**$14,381,506**	**$15,333,113**	**$15,294,331**

NOTES:
(1)   Category numbers used by the Texas Education Agency to classify expenditures.
(2)   Brownfield ISD participates in the National School Lunch Program and the School Breakfast program. The district accounts for revenues and expenditures for these programs separately from the general fund in a special revenue fund.
SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2015–16 to 2017–18 actual data and school year 2018–19 budgeted data.

received a 1.5 Smart Score, with an academic performance rating of very low academic progress and a high spending rate. Brownfield ISD's school year 2018–19 Smart Score rating of 1.5 is tied with Kermit ISD for the lowest among the four peer districts.

In May 2019, voters approved a $40.0 million facilities bond for Brownfield ISD. The district intends to use the bond funds to construct a new high school, secure entrances and visitor screening areas at all academic campuses, install new playgrounds at the district's elementary schools, and renovate other district facilities.

DETAILED ACCOMPLISHMENT

DIRECT DEPOSIT

Brownfield ISD ensures the timely and efficient processing of payroll and provides staff with convenient web-based access to payroll information.

The district distributes payroll electronically to all staff through direct deposit. Direct deposits eliminate costly paper check processing and the risk of lost checks. According to NACHA (formerly the National Automated Clearing House Association), savings per check for a district using direct deposit can range from $2.87 to $3.15.

FIGURE 3–3
BROWNFIELD ISD ACTUAL OPERATING EXPENDITURES COMPARED TO PEER DISTRICT AVERAGES AND STATEWIDE AVERAGES SCHOOL YEAR 2017–18

CATEGORY	BROWNFIELD ISD		PEER DISTRICTS AVERAGE		STATEWIDE AVERAGE	
	EXPENDITURES PER STUDENT	PERCENTAGE OF TOTAL	EXPENDITURES PER STUDENT	PERCENTAGE OF TOTAL	EXPENDITURES PER STUDENT	PERCENTAGE OF TOTAL
Instruction	$4,431	50.6%	$4,708	53.2%	$5,492	55.8%
Instructional Resources and Media	$87	1.0%	$114	1.3%	$113	1.1%
Curriculum and Staff Development	$122	1.4%	$124	1.4%	$218	2.2%
Instructional Leadership	$115	1.3%	$75	0.8%	$155	1.6%
School Leadership	$650	7.4%	$608	6.9%	$576	5.9%
Guidance Counseling Services	$179	2.0%	$255	2.9%	$358	3.6%
Social Work Services	$17	0.2%	$0	0.0%	$26	0.3%
Health Services	$138	1.6%	$82	0.9%	$100	1.0%
Transportation	$284	3.2%	$154	1.7%	$292	3.0%
Food Service Operation	$0	0.0%	$147	1.7%	$525	5.3%
Extracurricular	$572	6.5%	$461	5.2%	$299	3.0%
General Administration	$552	6.3%	$465	5.3%	$332	3.4%
Plant Maintenance and Operations	$1,269	14.5%	$1,383	15.6%	$1,030	10.5%
Security and Monitoring Services	$72	0.8%	$35	0.4%	$94	1.0%
Data Processing Services	$265	3.0%	$241	2.7%	$187	1.9%
Community Services	$0	0.0%	$5	0.1%	$48	0.0%
Total Operating Expenditures	**$8,753**	**100.0%**	**$8,852**	**100.0%**	**$9,845**	**100.0%**

NOTE: Percentages may not sum to due to rounding.
SOURCE: Texas Education Agency, Public Education Information Management System District Financial Actual Reports, school year 2017–18.

FIGURE 3–4
BROWNFIELD ISD FIRST AND SMART SCORE RATINGS COMPARED TO PEER DISTRICTS, SCHOOL YEAR 2018–19

DISTRICT	FIRST RATING	SMART SCORE	SMART SCORE ACADEMIC PERFORMANCE RATING	SMART SCORE SPENDING RATING
Brownfield ISD	**A/Superior**	**1.5**	**Very low academic progress**	**High spending**
Bishop CISD	A/Superior	4	High academic progress	Low spending
Kermit ISD	A/Superior	1.5	Very low academic progress	High spending
Littlefield ISD	A/Superior	4	Low academic progress	Very low spending
West Oso ISD	C/Meets Standard	2	Low academic progress	High spending

NOTE: CISD=Consolidated Independent School District; FIRST=Financial Integrity Rating System of Texas.
SOURCES: Texas Education Agency, Financial Integrity Rating System of Texas, school year 2017–18; Texans for Positive Economic Policy, 2019 Smart Scores.

According to district staff, the district rarely issues supplemental checks, and never issues them without the CFO's express, written authorization. For example, instead of issuing supplemental checks immediately to address errors in pay, the district makes adjustments during the following month's payroll. The restriction on supplemental checks decreases the need to issue small checks throughout the month and the staff time required to process and calculate payments to the U.S. Internal Revenue Service.

Staff may access their pay stubs, leave balances, and tax documents through the ERP system, which they may access through a link on the Brownfield ISD website. Providing

staff direct access to their pay information and leave balances decreases the number of requests to the Business Office for this information.

DETAILED FINDINGS

BUDGET PROCESS (REC. 13)

Brownfield ISD's budget-planning process does not connect the districtwide budget to the district's goals and objectives and does not include strategic planning for the timing and spending of state and federal grants and allotments.

The Brownfield ISD budget process for fiscal year 2019–20 began in March 2019, and the board approved the budget in August 2019. **Figure 3–5** shows the budget calendar for fiscal year 2019–20.

The district's budget development process does not connect spending to the priorities and needs of the district based on the campus improvement plans (CIP) and the district improvement plan (DIP). All campuses must develop CIPs annually as required by the Texas Education Code, Section 11.253. The CIP is a one-year plan that sets the campus's educational objectives and notes how the campus will allocate resources and time during the school year to meet the determined objectives. The Texas Education Code, Section 11.251(a), requires districts to develop board-approved DIPs annually. Districts develop DIPs to improve school performance by developing annual goals, objectives, and strategies based on analysis of student achievement, graduation rates, retention rates, and other federal and state accountability indicators. The DIP and CIPs provide critical direction for the district through annual goals and priorities.

Instead of connecting budgets to DIP and CIP goals, Brownfield ISD builds operating budgets based on previous years' activities. One reason that the district might not have based the fiscal year 2019–20 budget on district goals could have been that it had not adopted a current DIP or CIPs at the time the district was developing the budget. It appears that the district develops its DIP and CIPs each fall after the budget development process and completes them the following summer.

To develop campus and department budgets, principals and department heads complete a worksheet that includes the previous two years' budgets and space in which to estimate their needs for the upcoming year. The CFO, superintendent, and assistant superintendent meet with principals and department heads to discuss any new needs or major changes from previous years identified through this process, and the CFO prepares explanations to the board for extraordinary items.

This budget process enables the district to plan for immediate needs but does not include mechanisms for budgeting based on a consensus of long-term needs, use of resources, or stakeholder goals. As a result, the district reacts to

FIGURE 3–5
BROWNFIELD ISD BUDGET CALENDAR
FISCAL YEAR 2019–20

March 26, 2019	Budget process outlined to principals and Directors Budget process outlined to principals and directors
March 26, 2019	Begin campus/department/special programs budget preparation
March 26, 2019	Preparation of budget elements (e.g., projected enrollment, full-time-equivalent positions, property values, tax collections, etc.)
April 30, 2019	Completion of campus budgets, special programs, department budgets, and personnel staffing
April 30, 2019	Preliminary property values are available from appraisal district
May 23, 2019	First budget workshop
June 17, 2019	Complete first draft of campus, department and special programs budget
July 15, 2019	Second budget workshop
July 15, 2019	Certified property values from appraisal district
July 31, 2019	Third budget workshop
August 6, 2019	Advertise public budget hearing and adoption of budget and notice of tax rate increase, if any
August 8, 2019	Budget completion
August 19, 2019	Public budget hearing and adoption of budget and notice of tax rate increase, if any
August 19, 2019	Regular board meeting to adopt budget and tax rate

Source: Brownfield ISD Budget Calendar, fiscal year 2019–20.

administrative, operational, and academic challenges annually rather than through systematic planning. Passive or reactive budget planning often is costly and ineffective in advancing the district's goals. For example, TEA issues state accountability ratings ranging from A to F for each district and campus. The ratings are derived from a variety of indicators such as State of Texas Assessments of Academic Readiness test scores; graduation rates; measures of college, career, and military readiness; SAT and ACT college admission test scores; and college preparatory course completion. For school year 2018–19, Brownfield ISD received an overall C rating, and two of the district's six campuses received D ratings. Failure to consider the DIP or CIPs when determining spending priorities could put the district at risk of not meeting its academic improvement goals.

Similarly, the district does not connect grant applications to district goals or involve principals and department managers in planning for the expenditure of federal funding. The CFO serves as Brownfield ISD's grants manager and receives assistance from Regional Education Service Center XVII (Region 17) to prepare and submit the district's annual grant applications and periodic reports. Grant applications require the district to indicate how it plans to use grant funds; however, the CFO does not include principals' input in the planning and goal setting process for grant applications. As a result, principals are unaware of the amounts of the district's grant awards and the requirements for use. During interviews, principals said that they learn of available grant funds when they submit purchasing requisitions for approval, at which point the assistant superintendent or the curriculum secretary informs them whether they can charge a purchase against a specific grant.

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 prevent the district from maximizing the use of federal funding. A four-year summary of federal grant awards from school years 2015–16 to 2018–19 shows that Brownfield ISD received $7.4 million in federal grants and left approximately $1.3 million, or 17.0 percent, unused. As of December 2, 2019, Brownfield ISD had expended $1,882 of the district's fiscal year 2020 federal grant awards of $1.4 million.

Budget planning that connects the budget directly to the DIP and CIPs unites funding with the priorities of the district's academic programs. In addition, connecting the

grant applications to district goals and involving principals in planning strategically to spend those funds can help focus the activities, goods, and services purchased with grant funds on district goals.

Brownfield ISD should develop a proactive budget-planning approach to connect spending with identified needs and goals.

The business manager should develop written procedures for a budget development process that aligns:

- district spending to the advancement of the district's goals, DIP, and CIPs; and

- grants administration to district goals and involves the principals and academic leaders in the development of spending strategies for grant funds.

The fiscal impact assumes that the district achieves an annual gain of $317,454 ($1,269,816 total unused grant funds from school years 2015–16 to 2018–19 / four years) through improved grants planning and administration and maximizing the use of available federal funding.

CASH FLOW FORECASTING (REC. 14)

Brownfield ISD does not use cash flow forecasts to ensure that adequate funds are available to meet the district's cash requirements.

Business Office staff do not use a formal cash flow forecasting model. Instead, staff rely on the district's historical pattern of spending when deciding to transfer funds between investment and depository accounts. The CFO said that cash flow forecasts are unnecessary because the district's main outflows of cash follow predictable patterns. The district processes vendors' checks each Friday; these checks typically total $120,000. The district processes payroll on the eighteenth of each month, which typically amounts to $1.0 million. The Business Office can estimate these amounts reasonably in advance; therefore, it can transfer funds into the correct account the day before disbursing these payments.

Cash flow forecasting also involves estimating the actual revenues from the state and local sources. The district estimates revenues from state aid during its budget development process. For the school year 2019–20 budget, Brownfield ISD estimated $9.2 million in state revenues based on data provided by the TEA, which uses the district's average daily attendance (ADA) and property values to estimate state aid payments. The TEA sends payments to

districts in increments throughout the year, and the amount of each payment may differ from the estimates based on updates to ADA and property value data. According to Brownfield ISD's audit reports for fiscal years 2015 to 2019, the district has not needed any short-term loans to cover expenditures. However, the district's informal system of monitoring revenues and expenditures could result in a cash shortfall due to failure to plan for decreases in revenue estimates. TEA's Summary of Finances Report for Brownfield shows a decrease in the amount of estimated state aid that Brownfield can expect to receive, from $9.3 million in September 2019 to $8.9 million in March 2020.

In addition, the district's lack of cash flow forecasting has resulted in some lost grant revenues and could affect the district's ability to manage its future bond projects negatively. Brownfield ISD received $7.4 million in federal grant awards from fiscal year 2015 to 2019 but did not use $1.3 million of that amount. In the absence of a cash flow forecast that could identify when planned grant expenditures lag behind projections, the CFO and academic leadership team does not have a tool to help ensure the district maximizes the use of grant funds.

The lack of a cash flow forecasting process also may affect the funding of the district's long-term projects. Brownfield ISD expects work on the district's bond projects to begin as early as January 2020. Although the district does not expect progress payments on the projects to begin until May or June 2020, the district's financial advisor recommended issuing all of the bonds in August 2019, and the district received the proceeds in September 2019. Therefore, the district has cash on hand to begin the projects; however, the following critical factors affect cash flow:

- timing of debt service tax revenues compared to expected debt service payments;

- total amount of contract awards, timing of progress payments, and contingencies for potential cost overruns; and

- earnings from invested bond proceeds.

Without a cash flow forecast, the district may not be able to project needed cash flows as it awards contracts for projects. Additionally, the district may not be able to plan contingencies for cost overruns. Another concern is the total amount of contract awards with contingencies. During the onsite visit, district staff said that they were uncertain of how much of the $40.0 million will remain available for

other projects until after the district has received bids for the high school project. Maintaining a long-range cash flow forecast that allows the leadership and board to see the amount of funds encumbered and the amount remaining will be critical. If a project requires other funding sources, these projections can provide advance warning of impending shortages and assist district leaders to identify alternative funding before it is required.

Additionally, the absence of a cash flow forecasting process may prevent the district from planning for arbitrage rebates. According to Internal Revenue Service regulations, arbitrage rebates are payments owed to the federal government if the amount of interest earned on the bond proceeds exceeds the amount of interest paid on the bond. There is an increased likelihood that arbitrage rebates may occur because Brownfield ISD issued the bonds well in advance of the cash needs. A cash flow forecast would enable the district to project interest earnings for the invested bond proceeds and estimate whether rebates will be necessary as the district works to complete the bond projects.

Various cash flow forecasting models are available for school districts. For example, a cash flow template spreadsheet is available on Regional Education Service Center III's website. This spreadsheet provides a basic cash flow forecasting model, including formulas that automatically distribute state and federal revenues and debt service.

Brownfield ISD should establish formal cash flow forecasting. The business manager should ensure that the cash flow forecasting model projects the following amounts:

- general fund revenues and expenditures by month;

- debt service revenues and expenditures, including possible arbitrage rebates;

- bond project expenditures; and

- federal revenues, including grants.

The district could implement this recommendation with existing resources.

FUND BALANCE (REC. 15)
Brownfield ISD lacks a policy to manage its fund balance.

A school district uses its general fund to pay for operating expenditures related to daily operations. The general fund balance is the difference between the district's total assets and liabilities. A district maintains a balance in

its general fund sufficient to cover a portion of operating and unforeseen expenditures and ensure cash flow while waiting for revenue. The Governmental Accounting Standards Board (GASB), 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 could be spent only for specific purposes because of local, state, or federal laws, or externally imposed conditions by grantors or creditors;

- committed – amounts constrained 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.

The Government Finance Officers Association (GFOA) represents public finance officials throughout the U.S. and Canada with a mission to advance excellence in public finance. In its publication, *Fund Balance Guidelines for the General Fund*, the GFOA recommends that governments "maintain unrestricted budgetary fund balance in their general fund of no less than two months of regular general fund operating revenues or regular general fund operating expenditures." It also recommends that "governments establish a formal policy on the level of unrestricted fund balance that should be maintained in the general fund for generally accepted accounting principles and budgetary purposes. Such a guideline should be set by the appropriate policy body and articulate a framework and process for how the government would increase or decrease the level of unrestricted fund balance over a specific time period."

The review team found no Brownfield ISD board policies related to fund balance in the district's online policy manual. However, the district's 2019 Annual Financial Report (AFR) states, "The board has adopted a minimum fund balance policy for the general fund. The policy requires the unassigned fund balance at fiscal year-end to be at least eight percent of the current fiscal year expenditures less capital outlay and transfers out budgeted for the fund." Regarding Brownfield ISD's unassigned fund balance, the AFR states that "it has

been the practice of the district to try and maintain a fund balance that is at least four months' operating expenses."

Despite these statements in the AFR, the CFO reported being unaware of a formal fund balance policy. The CFO said that the district's practice is to maintain three months of operating funds in the unassigned fund balance to provide for unexpected expenditures. According to district staff, needs have occurred during the past few years that required the district to designate the fund balance for certain specific purposes, including the construction of a softball field, roof repairs, and bus and technology purchases. **Figure 3–6** shows the district's fund balances from fiscal years 2015 to 2019.

According to the district's AFRs from fiscal years 2015 to 2019, the committed fund balance of $600,000 represents the amounts the board has designated for construction across the district, specifically, for roof repairs. The assigned fund balance of $1.3 million represents amounts that the superintendent has designated for purchases of buses and technology. Although the district has designated these funds for these purposes for at least the past five years, the district also has signed lease/purchase agreements for buses and authorized technology purchases during this period without using these funds. During interviews, staff responsible for these purchases reported being unaware of the designated funds available for their programs. In addition, the district did not provide the review team with any specific plans for roofing projects funded using the designated fund balance. This omission suggests that the district may have made these fund balance designations to decrease the amount of the unassigned fund balance rather than to address immediate needs. Although it is not improper to designate funds for a long period, holding the funds in these categories when it is not required legally or contractually may distort the district's true financial position. Furthermore, the fund balance designations may limit the district's ability to respond to urgent needs that do not match the stated purposes of the designated funds.

Figure 3–6 shows that the district's unassigned fund balance has met the GFOA-recommended goal of two months' operating expenditures for fiscal years 2018 and 2019. However, the unassigned fund balance has been less than the district's stated informal goal of three months' operating expenditures for fiscal years 2015 to 2019. Without a formal fund balance policy, the board does not have a benchmark to evaluate the impact of budget amendments on the district's fund balance. Furthermore, the audited financial reports and district staff interviews indicate conflicting understandings

FIGURE 3–6
BROWNFIELD ISD FUND BALANCES, FISCAL YEARS 2015 TO 2019

FUND BALANCES	2015	2016	2017	2018	2019
Total fund balances	$4,594,841	$4,164,635	$4,377,546	$5,063,446	$5,919,415
Unassigned	$2,694,841	$2,264,635	$2,477,546	$3,163,446	$3,970,044
Assigned for capital expenditures	$1,300,000	$1,300,000	$1,300,000	$1,300,000	$1,300,000
Committed for construction	$600,000	$600,000	$600,000	$600,000	$600,000
Nonspendable for inventories					$49,371
Total general fund operating expenditures	$17,271,579	$15,576,506	$15,098,254	$16,634,763	$16,686,290
GFOA goal of two months' operating expenditures	$2,878,597	$2,596,084	$2,516,376	$2,772,461	$2,781,048
Unassigned fund balance over/(under) GFOA goal	($183,756)	($331,449)	($38,830)	$390,986	$1,188,996
District's informal goal of three months' operating expenditures	$4,317,895	$3,894,127	$3,774,564	$4,158,691	$4,171,573
Unassigned fund balance over/(under) district goal	($1,623,054)	($1,629,492)	($1,297,018)	($995,245)	($201,529)

NOTE: GFOA=Government Finance Officers Association.
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield Annual Financial Reports, fiscal years 2015 to 2019.

of the district's goals for its financial position. Without a formal fund balance policy to guide the district in short-term and long-term planning, the reserves in the general fund, from which the district supports daily operations, could decrease to levels less than necessary to provide adequate protection against increases in normal operating costs or unforeseen financial crises.

TEA's Financial Accountability System Resource Guide (FASRG) states that the committed or assigned fund balance represents tentative plans for the future use of financial resources, and that "commitments require board action to earmark fund balance for bona fide purposes that will be fulfilled within a reasonable period."

The FASRG also provides information on the reporting of fund balances and states that "prudent financial management requires accumulating undesignated unreserved fund balance in the general fund in an amount that is adequate to cover net cash outflows that occur in virtually all schools during most of the fiscal year." TEA's guideline for computing the optimum fund balance in the general fund states that the optimum fund balance should be the sum of the following amounts: (1) the estimated amount needed to cover cash flow deficits in the general fund for the fall period in the following fiscal year; and (2) the estimated average monthly cash disbursements of the general fund for the following fiscal year. An appendix to FASRG includes the Fund Balance and Cash Flow Worksheet and the Instructions for Completion of Fund Balance and Cash Flow Worksheet for the General Fund. Although completing the worksheet is not mandatory, districts can use it to calculate the optimum unassigned fund balance for the general fund.

Brownfield ISD should develop a policy to identify the level of fund balance the district will maintain in the general fund and evaluate the use of committed and assigned funds.

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 and the superintendent 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 superintendent and business manager should consider any district goals, including construction plans as part of this process. It also should include a review of the TEA optimal fund balance worksheets for the same period to determine if the data contained in these worksheets are pertinent to Brownfield ISD's fund balance requirements. The recommended policy should address acceptable uses of any unassigned fund balance in excess of the minimum included in the policy. It also should include a plan to restore the fund balance if it decreases to less than the identified level.

The superintendent should consider whether the committed and assigned fund balances are intended for the stated purposes and either release the designation of those funds or broaden the assignment so that the district can use the funds for broader emergency needs.

The district could implement this recommendation with existing resources.

FIGURE 3–7
BROWNFIELD ISD INVESTMENT HISTORY
FISCAL YEARS 2015 TO 2019

CATEGORY	2015	2016	2017	2018	2019
Cash in bank	$2,326,320	$1,279,749	$1,644,872	$2,032,738	$3,191,888
Logic – Liquid Asset Portfolio	$571,398	$573,765	$82,792	$2,720,743	$784,531
TexPool	$5,344	$5,358	$5,393	$5,472	$5,599
Lone Star – Liquidity Plus Fund	$695,828	$445,814	$71,850	$140,019	$4,154,017(1)
Lone Star – Liquidity Corporate Fund	$199,271	$5,169	$37,034	$1,268,493	N/A (1)
Texas TERM – Texas Daily	$739,842	$41,894	$42,176	$42,807	$43,807
Total	**$4,538,003**	**$2,351,749**	**$1,884,117**	**$6,210,272**	**$8,179,842**

NOTE: (1) In Brownfield ISD's 2019 Annual Financial Report, the Lone Star funds are reported in one category as Lone Star Investment Pool. In the reports for fiscal years 2015 to 2018, the funds are shown separately.
SOURCE: Brownfield ISD Annual Financial Reports, fiscal years 2015 to 2019.

INVESTMENT MANAGEMENT (REC. 16)

Brownfield ISD lacks procedures to document investment management responsibilities and ensure the appropriate segregation of cash management duties from investment management duties.

The Public Funds Investment Act (PFIA), the Texas Government Code, Chapter 2256, governs public funds investment for school districts. The PFIA specifies the allowable investments for school districts and requires districts to adopt an investment policy and designate one or more investment officers. It also requires that the treasurer, CFO, and investment officer of a school district attend 10 hours of investment training within 12 months of assuming duties and eight hours of renewal training every two years thereafter.

Brownfield ISD documents investment policy in Board Policy CDA (LOCAL), which states that the superintendent or a board-designated individual will serve as the investment officer and invest district funds as directed by the board and in accordance with the district's written investment policy and generally accepted accounting procedures. According to staff during onsite interviews, the board designated the CFO and the finance specialist as the district's investment officers. Both the CFO and the finance specialist have completed the investment training required by the PFIA.

According to Brownfield ISD's audited financial reports from fiscal years 2015 to 2019, the district holds investments in three primary investment pools. **Figure 3–7** shows the amount of the district's cash and temporary investments at the end of each fiscal year from 2015 to 2019.

As of August 31, 2018, Brownfield ISD's cash and investments totaled $8,179,842. With the sale of the bond in September 2019, the amount held in these accounts increased considerably. As of September 30, 2019, the district's investments totaled $45,028,640.

The CFO manages the district's cash and investments and consults with an external financial adviser. Brownfield ISD has an investment policy and has designated staff as investment officers; however, no procedures document investment processes or assign investment-related responsibilities. In addition, the board has not designated any additional investment officers to accommodate anticipated staffing transitions in the Business Office.

At the time of the review team's onsite visit, the CFO planned to separate from the district in December 2019. District staff reported that, effective January 2020, the finance specialist will assume the CFO's duties and have the new title of business manager, and the curriculum secretary will fill the finance specialist role. Staff reported that the superintendent and the curriculum secretary plan to attend investment training. However, until the board designates these two staff members as investment officers, the current finance specialist will be Brownfield ISD's only authorized investment officer and will carry out all investment management functions. As long as this arrangement persists, the district will be unable to segregate cash management duties from investment management duties because the new business manager will be solely responsible for:

- making and recording deposits;

- authorizing transfers, transferring and recording the movement of funds out of and among the investment accounts; and

- reconciling the investment accounts.

The separation of transaction authority from accounting and record keeping is a critical internal control for the prevention of fraud, waste, and abuse. With more than $45.0 million currently held in investment accounts, the absence of this internal control increases the risk of funds being misappropriated or mishandled. In addition, failure to ensure adequate internal controls of investments violates Board Policy CDA (LOCAL), which states that "a system of internal controls shall be established and documented in writing and must include specific procedures designating who has authority to withdraw funds. Also, they shall be designed to protect against losses of public funds arising from fraud, employee error, misrepresentation by third parties, unanticipated changes in financial markets, or imprudent actions by employees and officers of the District." The policy lists the most important controls as:

- separation of transaction authority from accounting and record keeping and electronic transfer of funds;

- avoidance of collusion;

- custodial safekeeping;

- clear delegation of authority;

- written confirmation of telephone transactions;

- documentation of dealer questionnaires, quotations and bids, evaluations, transactions, and rationale; and

- avoidance of bearer-form securities.

Brownfield ISD should establish effective internal controls for investment management.

The board should adopt a formal resolution appointing the positions serving as authorized investment officers, including the superintendent, business manager, and finance specialist. The board should designate the roles as soon as practical, but permanent assignment should be contingent on the superintendent and the new finance specialist completing their training within 12 months.

The business manager should develop and implement written procedures for investment handling, designating the positions assigned to each step in the process to ensure the separation of duties required in board policy.

The district could implement this recommendation with existing resources.

PURCHASING PROCEDURES (REC. 17)

Brownfield ISD lacks adequate purchasing procedures for its decentralized purchasing function.

The Council of State Governments publication, *State and Local Governmental Purchasing*, defines centralized and decentralized purchasing as follows:

- centralized purchasing is "a system of purchasing in which authority, responsibility, and control of activities are concentrated in one administrative unit"; and

- decentralized purchasing is "a system of purchasing in which there is a varying degree of delegation of authority, responsibility, and control of purchasing activities to the several using agencies."

Brownfield ISD has a decentralized purchasing function through which campuses and departments procure goods and services. To initiate a purchase, campuses and departments enter a requisition into the ERP system designating the account code to charge the expenditure against, and attach a purchase justification form and bids from three vendors for the item. The ERP system enables the purchase request to proceed if the designated account has sufficient funds for the expenditure. The system routes requisitions through programmed approval paths to the appropriate staff for authorization. After the CFO grants final approval, the system generates a purchase order that enables the campus or department to place the order with the vendor or initiate a credit card purchase. The requesting campus or department compares the goods or services received to the original order and enters the receiving information into the ERP system. When the district receives an invoice, the Business Office initiates the vendor payment after comparing the information in the purchase order, receiving paperwork, and the invoice.

The district does not have a separate process for purchases of less than $50,000 and requires the same documentation and final approval from the CFO, regardless of the purchase amount. According to district staff, the district deliberately has not established a more streamlined process for purchases at various cost thresholds of less than $50,000 out of concern that staff would split purchases of $50,000 or greater into smaller procurements to avoid the stricter documentation requirements.

Although adhering to a uniform process for all purchases may decrease the risk that staff will circumvent district

FIGURE 3–8
BROWNFIELD ISD BUSINESS OFFICE PROCEDURES MANUAL PURCHASING GUIDELINES
OCTOBER 2017

1.0 General Purchasing Guidelines

1.1   Employees may NOT order goods or services on behalf of the district without an approved purchase order.

1.2   The purchasing process begins with the identification of goods or services that the district intends to acquire. The procurement of these goods or services is monitored in the Business Office.

1.3   The school district objective is to purchase the best products, materials, and services at the lowest practical prices within relevant statutes and policies.

1.4   The organization director/principal is responsible for all expenditures made from budgets assigned to him/her.

1.5   Budget allocations are intended for expenditures for goods and services to be used during the current school year.

1.6   Unused budget appropriations lapse at year-end.

2.0 Purchasing Legal / Local Requirements

2.1   Purchases of similar goods or services valued at $50,000 or more in the aggregate during a twelve-month period require a competitive bid processed in the Business Office, unless exempted by approved inter-local agreements.

2.2   All goods or services valued at $50,000 or more must be approved by the Board of Trustees.

3.0 Purchase Requisitions/Purchase Orders

3.1   All District purchases should be made with an online requisition / purchase order.

3.2   Skyward is the financial software used for on-line requisitions / purchase orders.

3.3   A general description of the items or services being purchased must be included, along with reference(s) to a Campus Improvement Plan or District Improvement Plan goal(s), strategy(ies), or activity(ies).

3.4   The purchase requisition is entered on-line by the individual requesting the goods or services, approved by the authorized department head or school principal and then approved and converted to a purchase order by the Director of Curriculum and Instruction or Chief Financial Officer.

3.5   The budget account the goods or services will be charged to on the purchase requisition must have sufficient funds in order to complete the requisition. Budget transfers may be processed between the same function only.

3.6   All attachments and supporting documentation for the purchase requisition should be included before the requisition can be processed.

3.7   If a vendor cannot be located in Skyward, you will need to obtain a W-9 form and send it to the Business Office before the purchase requisition can be entered into the system.

3.8   If it is necessary to cancel a purchase order, the originator must advise the purchasing department in writing why the originator is canceling the order.

3.9   Purchase orders are not to be modified by schools or departments directly. If it becomes necessary to change the terms of a purchase order, the school or department must contact the Business Office.

Source: Brownfield ISD Business Office Procedures Manual, October 2017.

purchasing controls, staff report that the requirements increase the time required to complete purchases. Results from a review team survey showed that 29.0 percent of campus staff agreed with the statement "Purchasing processes are not cumbersome for the requestor, so I get what I need when I need it," and 49.3 percent disagreed with the statement. During interviews, some campus staff said that the district should adopt purchasing thresholds of less than $50,000. Some said that the requirement for three quotes for every purchase is onerous and often inefficient, especially in cases when only one vendor in the area is available to provide a particular product or service.

The Business Office Procedures Manual contains some basic information on the purchasing process, as shown in **Figure 3–8**.

The district's documented purchasing guidelines lack instructions for several key processes related to purchasing. First, the guidelines do not reflect the actual process described by staff in interviews. The purchasing guidelines shown in **Figure 3–8** do not describe the process for obtaining three quotes or completing a purchasing justification form.

In addition, the guidelines do not address steps for purchases that require competitive bidding. Procedure 2.1 states that

purchases of similar goods or services valued at $50,000 or more in the aggregate during a 12-month period require a competitive bid processed in the Business Office, unless exempted by approved interlocal agreements. However, the guidelines do not provide any instructions on the competitive procurement processes or provide specific instructions for the legal steps in the process for advertising, accepting, and evaluating bids. The guidelines also do not address vendor selection, contract administration, or receiving and distributing purchases.

According to TEA's FASRG, 2019, purchasing in the public sector presents numerous challenges, including "the requirement to comply with numerous statutes, policies, legal interpretations, and procedures." Without comprehensive purchasing procedures, the district cannot ensure staff are aware of appropriate purchasing methods and applying them according to state and federal guidelines. In addition, the CFO does not periodically audit or review accounts payable files to detect transactional errors and to determine whether additional controls or refresher staff training is necessary. During the onsite visit, the review team observed errors in several accounts payable files. For example, one file had missing data and the cost scoring did not follow a formula for awarding the points. In another, staff made the purchase before entering a purchase order into the system, and the file did not contain a purchase justification form. A weak purchasing control system places

the district at risk of making unnecessary and costly purchases, increases the risk of litigation when the district does not consistently follow competitive bidding requirements, and jeopardizes the community trust in the school district's ability to manage its funds.

Regional Education Service Center XX (Region 20) developed a Procurement Policies and Procedures Manual Template, 2017, intended to help districts comply with state purchasing rules in the Texas Education Code, Section 44.031, which applies to all school districts. **Figure 3–9** shows an abbreviated list of the Region 20 template and stipulates whether Brownfield ISD addresses the topics in board policy or the Business Office Procedures Manual.

Some districts establish thresholds for the approval of purchases to improve the efficiency of the purchasing process. For example, a lower-level manager or director may authorize purchases of less than $500; the CFO may authorize purchases up to $25,000; and purchases of greater than $25,000 may require the approval of the superintendent.

Brownfield ISD should establish procedures to improve purchasing efficiency and ensure that staff apply appropriate purchasing methods in accordance with state and federal laws.

FIGURE 3–9
COMPARISON OF BEST PRACTICE PURCHASING TEMPLATE CONTENTS TO TOPICS ADDRESSED IN BROWNFIELD ISD POLICIES AND PROCEDURES, DECEMBER 2019

TOPIC	BOARD POLICY (DECEMBER 2019)	WRITTEN PROCEDURES (OCTOBER 2017)
Control Environment		
Purchasing Functions and Roles	Superintendent role designated	Not addressed
Procurement Records/Retention	Not addressed	Addressed
Purchasing Ethics		
Standards of Conduct (Conflicts of Interest)	Addressed	Not addressed
Disclosure of Conflict of Interest	Addressed	Not addressed
Procurement Methods		
Procurement Method Chart	Not addressed	Not addressed
Competitive Procurement Categories	Partially addressed	Not addressed
Small Purchase Method for Procurement Actions valued at less than $50,000	Not addressed	Addressed
Competitive Procurement Method for Procurement Actions valued at $50,000 or more	Not addressed	Not addressed
Competitive Bidding	Partially addressed	Not addressed
Competitive Sealed Proposals/Request for Proposals	Partially addressed	Not addressed
Contract Cost or Price Analysis for Procurement Actions valued at more than $150,000	Not addressed	Not addressed
Procurement by Noncompetitive Proposals (Sole-Source)	Not addressed	Not addressed
Change Orders Process	Not addressed	Not addressed

FIGURE 3–9 (CONTINUED)
COMPARISON OF BEST PRACTICE PURCHASING TEMPLATE CONTENTS TO TOPICS ADDRESSED IN BROWNFIELD ISD POLICIES AND PROCEDURES, DECEMBER 2019

TOPIC	BOARD POLICY (DECEMBER 2019)	WRITTEN PROCEDURES (OCTOBER 2017)
Procurement Methods (continued)		
Interlocal Contract/Purchasing Cooperative Process	Not addressed	Not addressed
Federally-Funded Expenditures Using Purchasing Cooperative	Not addressed	Not addressed
Vendor Selection and Relations		
Vendor Communications	Not addressed	Not addressed
Vendor List	Not addressed	Partially addressed
Vendor Award Determination Criteria	Not addressed	Not addressed
Vendor Performance Evaluation	Not addressed	Not addressed
Contracts		
Contracting with Small and Minority Businesses, Women's, Labor Surplus	Not addressed	Not addressed
Contract Provisions		
EDGAR Requirements (1)	Not addressed	Not addressed
Multiyear Contracts and Subscriptions with Federal Funds	Not addressed	Not addressed
Contract Administration	Not addressed	Not addressed
Credit, Debit, Gift, and Procurement Cards		
Credit/Procurement Cards	Not addressed	Addressed
Segregation of Duties	Not addressed	Not addressed
Monitoring and Oversight	Not addressed	Not addressed
Gift Cards (Prohibition or Recognition as Income for IRS Purposes) (1)	Not addressed	Not addressed
Purchase or Credit/Debit Card Rebates or Discounts	Not addressed	Not addressed
Requisitions		
Approval, format, and flow of requisitions	Not addressed	Addressed
Encumbrances	Not addressed	Not addressed
Purchase Orders		
Purchase Order Process	Addressed	Addressed
Approval and Processing of Purchase Orders	Not addressed	Partially addressed
Blanket Purchase Orders	Not addressed	Not addressed
Emergency Purchases	Not addressed	Not addressed
Receiving and Distributing Purchases		
Receiving Procedures	Not addressed	Not addressed
Receiving Report and Quality Assurance	Not addressed	Not addressed
Distribution	Not addressed	Not addressed
Invoices		
Invoice Submission Procedures and Required Documentation	Not addressed	Partially addressed
Purchasing Deadlines		
Purchasing Deadlines for Supplies and Equipment; Summer needs; Services and Travel; and State and Federal Grants	Not addressed	Partially addressed

NOTE: (1) EDGAR=federal Education Department General Administrative Regulations; IRS=U.S. Internal Revenue Service.
SOURCES: Legislative Budget Board School Performance Review Team, December 2019; Regional Education Service Center XX Procurement Policies and Procedures Manual Template, 2017; Brownfield ISD Board Policy Manual, December 2019; Brownfield ISD Business Office Procedures Manual, October 2017

The business manager should perform the following tasks:

- amend the Business Office Procedures Manual to include procurement procedures following the Region 20 template;

- establish purchasing dollar thresholds that have progressively higher approval and competitive quote or bid requirements; and

- establish a transactional audit program that includes random file reviews each month. Set a materiality threshold to determine which transactions to monitor closely. For example, consider setting a threshold for the business manager to audit any transactions greater than $50,000, $75,000 or $100,000.

The district could implement this recommendation with existing resources.

CONTRACT MANAGEMENT (REC. 18)

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

The district has a decentralized contract management function, and board policy and district procedures are unclear on several key aspects of contract administration. First, the board has not established a policy as to which district positions have authority to sign contracts. Board Policy CH (LOCAL) states that the superintendent is authorized to make purchasing decisions of less than $50,000 and the board must approve purchases at or above this threshold. During onsite interviews, staff said that the superintendent, CFO, and the board president regularly sign contracts. A review of district contracts shows that the assistant superintendent, department heads, and other campus staff also sign contracts.

In the absence of clear guidelines regarding who can sign contracts, the district is at risk of staff engaging in legally binding contracts unbeknownst to the Business Office. Effective districts establish a controlled signatory process through which only the superintendent is authorized to sign all contracts of less than $50,000, and the CFO signs on behalf of the superintendent in his or her absence.

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. During the onsite visit, the review team requested copies of several contracts. In some

FIGURE 3–10
BROWNFIELD ISD RECORD RETENTION BY CONTRACT TYPE, DECEMBER 2019

CONTRACT TYPE	RETENTION PERIOD
Construction project files	Permanent
Architects and engineers	5 years after project completion
Construction	Permanent
Facilities use	4 years after expiration
Installation	10 years after project
Maintenance and Service	4 years after expiration
Other	4 years after project completion

SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD Board Policy CPC (LEGAL), December 2019.

instances, staff produced the contracts from the accounts payable files in the Business Office; in other instances, Business Office staff called individual departments to locate the contracts.

Without a central file for all original contracts in the Business Office, the CFO and superintendent do not have immediate access to all original contracts. The district's records retention schedule contains timeframes for the retention of different types of contracts. **Figure 3–10** shows the retention schedule by contract type.

With contracts physically disbursed throughout the district, the management of these files becomes increasingly difficult and the district risks failing to maintain original contract files in accordance with the records retention schedule.

In addition to the lack of a master contract file, the district does not have a designated contract manager; instead, principals and department heads oversee contracts managed by their campus or department. The district's Business Office Procedures Manual contains general purchasing guidelines and procedures for purchase requisitions and purchase orders. It does not address contracts or provide guidance for administrators on any aspect of contract management.

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, the primary responsibilities of a contract manager include the following duties:

- participating with the procurement team in solicitation development and the review of contract documents;

- serving as the primary point of contact for agency communication with the contractor regarding all matters pertaining to the contract;

- managing any state 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 keep timely records of findings;

- consulting with agency legal counsel in a timely manner to address any legal concerns and/or issues;

- managing, approving, and documenting any changes to the contract through the amendment process authorized by the terms of the contract;

- inspecting and approving the products and/or services by submitting a written document accepting the deliverables or obtain documentation from the end users responsible 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 state remedies, as appropriate, when a contractor's performance is deficient;

- maintaining appropriate records in accordance with the records retention schedule;

- confirming all products and services have been delivered and delivery is completed prior to the expiration date of the contract; and

- performing contract closeout processes by ensuring the contract file contains all necessary contract documentation.

Without contracting guidance from the Business Office, contract managers across the district may not be adequately

performing the duties enumerated in the *State of Texas Procurement and Contract Management Guide*. In particular, the lack of district procedures for contract monitoring increases the risk that staff that oversee contracts do not ensure that vendors perform all contractually required duties and do not address poor vendor performance. The absence of formal policies, processes, and procedures for large and small contracts could result in rising costs, poor-quality services or products, and inadvertent noncompliance with records retention requirements.

For example, Brownfield ISD paid its copier vendor $120,977 during school year 2018–19. District and campus staff said that the vendor is not responsive to service calls, and campuses report being dissatisfied with the level of service provided. Although the district did not provide the review team a copy of the copier contract, it likely contains standard provisions for the agreed-upon level of service and remedies for poor service. During interviews, staff said that they complain regularly about the copier machines to no avail. This lack of documented response indicates that the district may not be evaluating this vendor and holding it accountable for meeting its service-level agreement.

Monitoring the performance of the contractor is a key function of proper contract management. At the time of the review, the district purchased most goods and services through purchasing cooperatives and did not have many active contracts. However, in May 2019, Brownfield ISD voters approved a $40.0 million bond package for renovations to existing buildings and for the construction of a new high school. To facilitate the construction of the new high school and assist in other aspects of the bond projects, Brownfield ISD contracted for the services of an architectural firm and a construction manager at risk. However, the district may not have the necessary internal resources to perform the construction contract management and control functions adequately.

Construction contract management involves the same basic duties outlined in the *State of Texas Procurement and Contract Management Guide*; however, construction projects increase the magnitude of each of these tasks in the following ways:

- communication – an internal project manager must serve as the conduit for formal and informal communication between the contractors, the board, campus leaders, and stakeholders;

- monitoring the contractor's progress and performance –the architect, program manager, and construction

manager are charged with monitoring the construction progress; the project manager should visit the work site frequently to verify that workers are following safety guidelines and construction standards;

- inspecting and approving deliverables and change orders – when changes occur, the project manager, architect, and construction manager must be ready to inspect and discuss options, prepare reports, and present reports and change requests to the board for approval. These changes may occur infrequently, but the process can be time-consuming; and

- verifying accuracy of invoices and authorizing payments – the verification of invoices is a complex process, which had led some districts to prepare a checklist for the project manager to use when validating the invoices. Even small errors can add up on a large construction project, making this task especially important, particularly if the district is not using a construction auditor to audit the files.

According to the district's design and construction manager contracts, the superintendent is the designated district representative. During interviews, district staff said that the director of maintenance and transportation performs the daily activities related to construction contract management for the bond projects, such as overseeing and inspecting vendors' work and processing invoices; the superintendent's secretary processes the documentation. The review team observed that these staff already work at full capacity, and often much longer than a standard 40.0-hour week. The additional work associated with the construction contract management may require at least 50.0 percent of staff time, which could be difficult to sustain during the course of the bond projects, a period ranging from approximately 18 months to 24 months.

As a result, the district may be challenged to respond to project demands to the detriment of its normal ongoing work. The district cannot use bond funds to pay staff salaries; however, effective districts contract for support during the construction phase to assist in the project record keeping and other contract monitoring and management activities.

Brownfield ISD should implement controls to improve contract management functions.

The board should adopt a policy limiting the contract signatory authority for purchases less than $50,000 to the superintendent and business manager.

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 that they understand their roles and responsibilities as outlined in the State of Texas Procurement and Contract Management Guide;

- amend the Business Office Procedures Manual to include the evaluation of contractors and the steps for notifying a vendor when performance is substandard, and for terminating a vendor contract when remedies have been unsuccessful;

- immediately document and attempt to remedy the performance of the copier vendor and, if necessary, terminate the contract and rebid the contract to obtain higher levels of service; and

- use bond funds to contract for the services of an experienced part-time construction accountant/ auditor for a period not to exceed the length of the bond project. This contractor will help the administration develop and maintain appropriate records, validate and audit progress payments, and assist with coordinating project phases, including the closeout and move-in processes. As part of the contractor's duties, the district should require checklists and procedures to guide staff in complying with state and federal laws should the contractor leave before the contract term is completed. These same procedures may also form the basis for the district's management of future projects.

The fiscal impact assumes that the district uses bond funds to contract with an experienced accountant/auditor to work approximately 20.0 hours per week at a rate of $50 per hour, for an annual cost of $52,000 per year ($1,000 per week x 52 weeks).

CREDIT CARDS (REC. 19)

Brownfield ISD lacks adequate charge card guidelines and does not follow or enforce existing guidelines consistently.

Brownfield ISD permits district and campus staff to purchase goods and services using credit cards. Citibank, N.A., is the credit card issuer for most district credit cards. The district

FIGURE 3–11
BROWNFIELD ISD BUSINESS OFFICE PROCEDURES MANUAL CHARGE CARD GUIDELINES
OCTOBER 2017

1.0 General Charge Card Guidelines

1.1   District charge cards may NOT be checked out without an approved purchase order.

1.2   District charge cards include MasterCard, United, Sam's, and fleet fuel cards.

1.3   Employees must request use of the district charge cards through the Business Office.

1.4   Employees must bring a copy of the approved purchase order and sign the charge card check-out log before the card can be checked out.

2.0 Charge Card Usage and Activity

2.1   District charge cards may be used for purchasing goods or services only if items are 50.0% cheaper than a vendor that accepts purchase orders.

2.2   District charge cards may also be used for travel when necessary.

2.3   The employee is responsible for obtaining a detailed receipt that includes a description of the goods purchased or services rendered. Submitting a signature total only is not considered a proper detailed receipt.

2.4   The employee must return the charge card (and detailed receipts) to the Business Office once the purpose of the use of the credit card has been met.

2.5   The charge card check-out log must be signed upon return of the charge card to the Business Office.

2.6   No gratuities or taxes.

2.7   No online orders.

2.8   Any employee who misuses a charge card or can't provide receipts will be responsible for the card charges and may have card privileges revoked or disciplinary actions up to and including termination of employment.

SOURCE: Brownfield ISD Business Office Procedures Manual, October 2017.

paid the issuer $237,077 during school year 2018–19. The district's fleet also uses fuel cards, and the district has charge accounts at retail stores. Each campus has one or more assigned credit cards that staff request from the campus central office before use. The district assigns certain staff credit cards to use. These staff include the superintendent, assistant superintendent, director of maintenance and transportation, school resource officer, high school principal, and athletic director. The district has 18 bank credit cards available for staff use.

Figure 3–11 shows the Business Office Procedures Manual guidelines related to the use of credit cards.

Information obtained during onsite interviews indicate that staff do not follow the district's charge card guidelines consistently. First, according to the Business Office Procedures Manual, procedure 1.4, "employee must bring a copy of the approved purchase order and sign the charge card check-out log before the card can be checked out." Although staff appear to follow this process for cards held at the central office, staff do not always follow the process for purchases made with personal cards. Business Office staff said that they often enter requisitions and generate purchase orders for purchases made on cards issued to the superintendent and

the director of maintenance and transportation after these individuals have made the purchases.

According to procedure 2.3, "The employee is responsible for obtaining a detailed receipt that includes a description of the goods purchased or services rendered. Submitting a signature total only is not considered proper detailed receipt." However, according to district staff, if staff has lost the receipt, they sign a letter that states the detail of the purchase and its use. Business Office staff then process the reimbursement based on the signed letter. Staff also said that the district does not provide any consequences for failure to provide receipts, indicating that the district does not enforce procedure 2.8, which states "any employee who misuses a charge card or can't provide receipts will be responsible for the card charges and may have card privileges revoked or disciplinary actions up to and including termination of employment."

Procedure 2.7 prohibits staff from using credit cards for online orders. However, the review team observed several examples of credit cards used to place online orders.

A review of the district's credit card statements also shows that the district does not follow the Business Office Procedures Manual in the use of credit cards for student or

staff travel and meals. According to these procedures, "restaurants should be contacted in advance to verify they will accept a [purchase order] and bill the district for meals." Instead of using purchase orders, the district pays for most student meals using credit cards. Staff said that they use credit cards for student meals because restaurants typically do not accept purchase orders. However, a review of the district's top-paid vendors in the district's ERP system shows a number of restaurants and fast-food vendors. In order for the ERP system to issue a payment to vendors, staff must enter a purchase order into the system. Many of these same restaurants and vendors appear on the district's credit card statements, which indicates that campus and district staff used credit cards for these purchases to bypass the purchase order process.

For staff meals, the Business Office Procedures Manual states "meal allowances and reimbursements will only be processed for overnight trips, not for day trips." Yet, many of the meals purchased on the credit cards are for meals in Lubbock, a 40-minute drive from Brownfield. According to staff, if district or campus staff visit Region 17 in Lubbock for training that extends through the lunch hour, the district will provide meals for the training attendees; however, the Business Office Procedures Manual does not document this practice.

Although the Business Office Procedures Manual permits the reimbursement of staff meals purchased during overnight travel, the district's practice is to provide staff travel advances for meals. The Business Office Procedures Manual does not contain a process for travel advances. According to staff, the district calculates travel advance amounts based on state and federal per diem rates. Information gathered during interviews indicates that staff are not required to provide receipts for meals purchased with travel advances. Although this practice may simplify bookkeeping, the district's credit card statements appear to contain charges for meals purchased in conjunction with travel. These charges may be duplications of or additions to travel advance amounts. For example, the district's credit card statements show charges for meals related to staff travel to San Antonio on May 17 and 18, 2019. If the participant received a per diem advance before the trip, these charges would be a duplication of that amount. District staff said they do not perform a verification of the receipts paid with travel advances during the credit card reconciliation process.

District staff also use credit cards to pay for business dinners. The district did not provide a formal procedure for review. However, district staff reported the practice of

Brownfield ISD administrators using credit cards to pay for meals with board members, city officials, or other individuals with whom the district conducts business locally. The district did not make any information about attendees available to the review team; however, it appears that the meetings occur frequently. From June 2019 to August 2019, 19 in-town meals charged to the superintendent and assistant superintendent's credit cards totaled $1,635. Of this total, the superintendent charged 14 meals totaling $1,269, and the assistant superintendent charged five meals totaling $366.

The district's ERP system has internal controls to ensure that purchases receive appropriate approval and that sufficient funds are available to cover the cost of purchases. When staff do not enter requisitions into the system in advance of the purchase, they circumvent those controls, increasing the district's risk of fraud, waste, and abuse. Similarly, the lack of adequate guidelines for the use of credit cards and the lack of enforcement of the Business Office procedures undermines the district's ability to detect the abuse or mismanagement of district funds. Without clear procedures for charging personal meals or for paying for the meals of others, the district leaves these decisions to the discretion of district staff. This practice leaves the district open to accusations of discriminatory treatment by individuals for whom the district does not provide meals. In addition, the district cannot ensure that it limits the use of public funds for documented public purposes.

According to the GFOA, "governments need to maintain appropriate controls, in accordance with their purchasing policy, to ensure the ongoing success of a purchasing card program." These controls should include the following written policies and procedures for internal staff:

- instructions on staff responsibility and written acknowledgments signed by staff;

- ongoing training of cardholders and supervisors;

- spending and transaction limits for each cardholder both per transaction and on a monthly basis;

- written requests for higher spending limits;

- record keeping requirements, including review and approval processes;

- clear guidelines on the appropriate uses of purchasing cards, including approved and unapproved merchant category codes;

- guidelines for making purchases by telephone and fax or through the Internet;

- periodic audits for card activity and retention of sales receipts and documentation of purchases;

- timely reconciliation by cardholders and supervisors;

- procedures for handling disputes and unauthorized purchases;

- procedures for card issuance and cancellation, lost or stolen cards, and staff termination;

- segregation of duties among staff that process payment approvals, accounting, and reconciliations; and

- regular review of spending per vendor and merchant category codes.

Brownfield ISD should strengthen the district's charge card guidelines to include more detailed procedures and establish internal controls to comply with the guidelines.

The business manager should perform the following tasks:

- hold staff personally responsible for credit card charges they cannot support with a receipt. Require staff that lose receipts to obtain duplicate receipts from the vendors or forgo reimbursement.

- enforce the student meal guidelines, including the submission of purchase orders before using a credit card for student meals, and require the submitter to provide proof that the vendors will not accept purchase orders for payment;

- establish requirements for supporting documentation for student meal charges, including a list of all individuals who received a meal;

- limit meal charges to meals for students and officially named coaches and sponsors;

- discontinue the practice of paying for meals for staff on day trips, even when those trips include training;

- discontinue the practice of paying meal advances to staff for travel and require them to provide copies of receipts for reimbursement;

- document the acceptable scenarios in which staff may charge personal meals, provide meals or pay for the meals of others; and

- coordinate with the superintendent to establish and enforce progressive discipline for failure to follow

the district's Business Office Procedures Manual charge card procedures; discipline may include the withdrawal of credit card privileges, disciplinary write-ups, and termination, if warranted. The guidelines should apply to all levels of the administration.

The fiscal impact assumes that the district will implement stronger controls of credit cards and reduce credit card charges by 10.0 percent, resulting in an annual savings of $23,708 (0.10 x $237,077).

CASH HANDLING (REC. 20)

Brownfield ISD lacks internal controls for campus-based cash handling.

Campuses process cash collected from various sources and activities, including fund raisers, parking permits, club dues, vending machines, concession stands, T-shirts, pictures, and yearbooks.

The secondary student handbook describes the following fees students may be required to pay:

- costs for class project materials that the student will keep;

- membership dues in voluntary clubs or student organizations and admission fees to extracurricular activities;

- security deposits;

- personal physical education and athletic equipment and apparel;

- voluntarily purchased pictures, publications, class rings, yearbooks, and graduation announcements;

- voluntarily purchased student health and accident insurance;

- musical instrument rental and maintenance of uniforms provided by the district;

- personal apparel used in extracurricular activities that becomes the property of the student;

- parking fees and student identification cards;

- fees for lost, damaged, or overdue library books;

- fees for driver training courses, if offered;

- fees for optional courses offered for credit that require use of facilities not available on district premises;

- summer school for courses that are offered tuition-free during the regular school year;

- a reasonable fee for providing transportation to a student who lives within two miles of the school;

- a fee up to $50 for costs of providing an educational program outside of regular school hours for a student that has lost credit or has not been awarded a final grade because of absences and whose parent chooses the program for the student to meet the 90.0 percent attendance requirement. The fee will be charged only if the parent or guardian signs a district-provided request form; and

- in some cases, a fee for a course taken through the Texas Virtual School Network.

Campus staff that collect cash include teachers, coaches, and student activity sponsors. Typically, campus staff bring to the Business Office most cash collected at campuses or store the cash in campus vaults and then bring it to the Business Office. Business Office staff then recount the cash and both the Business Office staff and the campus staff approve the amounts. The Business Office records the amount of cash received and the account for deposit. Business Office staff store the deposits in a vault in the central office administration building.

Figure 3–12 shows Brownfield ISD's campus-based cash-handling processes.

The district's Business Office Procedures Manual contains guidance on cash handling procedures. Section 7 addresses the following cash management procedures:

- Campus Cash Management/Deposits;

- Business Office Cash Management/Deposits; and

- Petty Cash.

Information gathered from interviews with campus staff indicates that campus-based cash handling processes do not always follow these guidelines. **Figure 3–13** shows a comparison of the district's cash management guidelines to campus practices.

As shown in **Figure 3–13**, the district does not enforce the Business Office Procedures cash handling guidelines. In addition, the Business Office Procedures lack guidelines for all processes related to cash. For example, for fund raisers and concession stands where teachers, volunteers, and other staff

collect funds, the procedures do not require staff to issue receipts for cash received, which provides no assurance that staff deposit the actual amount collected. The district also has no guidelines that discuss whether staff can deduct expenses relating to the fund raiser from the cash deposited, and whether a receipt is required to show the amount of expenses deducted. Brownfield ISD requires that staff deposit all student activity funds into an account controlled by the district, rather than accounts established by campuses or organizations, which decreases the risk of malfeasance and ensures the uniform processing of activity funds. However, without sufficient guidelines for cash handling, the district cannot determine the actual amount collected in comparison to the amount of the final deposit for these funds.
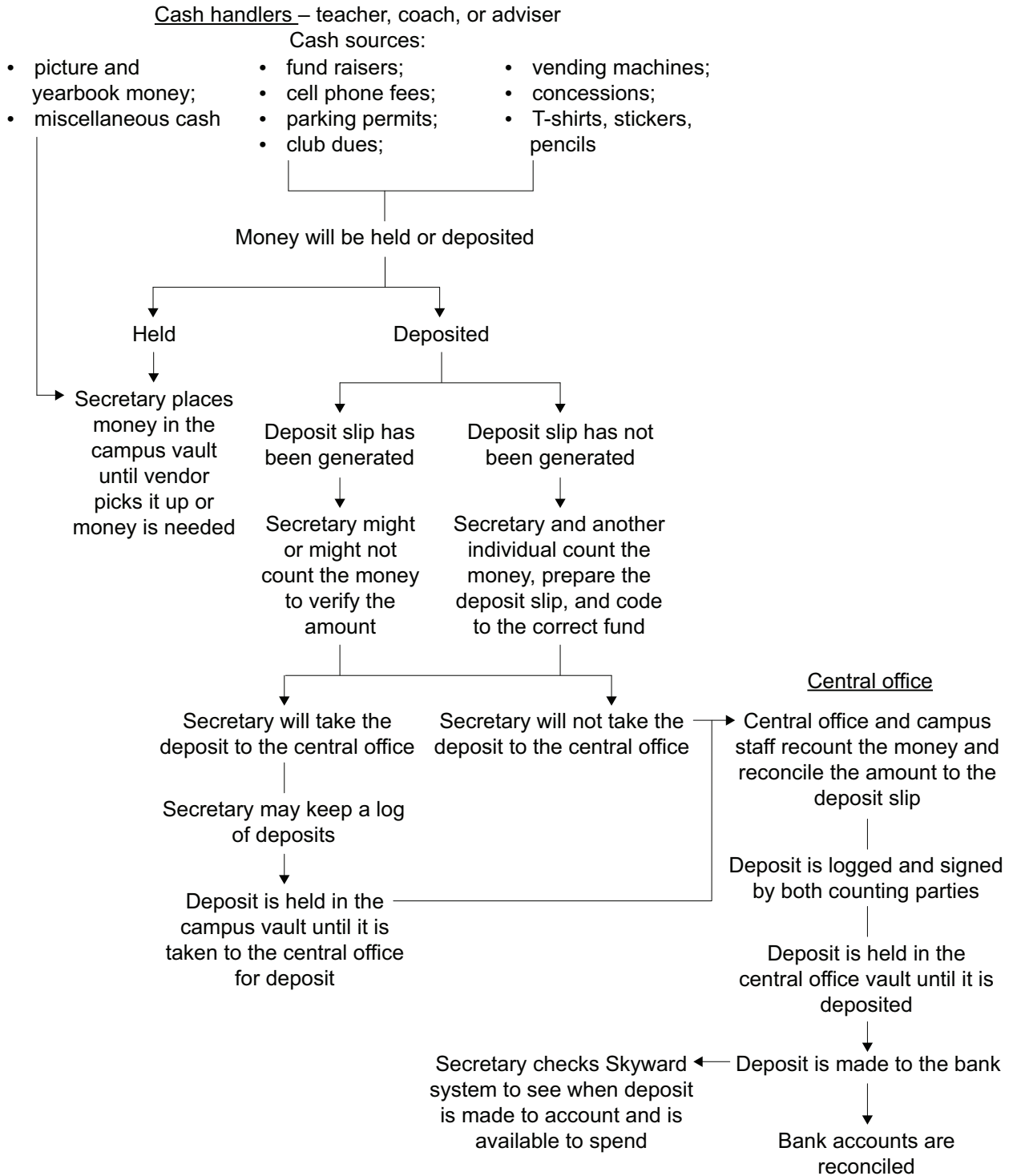
The Business Office Procedures Manual also does not address the handling of student fees, including cell phone fees. Both the elementary and secondary student handbooks contains the following statement: "If a student uses a telecommunications device without authorization during the school day, the device will be confiscated. The parent may pick up the confiscated telecommunications device from the principal's office for a fee of $15." Campus staff reported different methods for depositing and using these fees. Some staff said that they deposit fees into the general fund, and others reported depositing fees into the principal's activity fund or storing the collected fees in the campus vault for use at the principal's discretion. Information gathered in interviews suggests that these fees should be deposited in the general fund; however, this requirement does not appear in the Business Office Procedures Manual or in Board Policy.

Similarly, the Business Office Procedures Manual does not address payments that staff retain in campus vaults to pay a vendor directly. For example, teachers submit yearbook and picture fees collected from students to the school office, where campus secretaries store the money until the vendor retrieves it, which may occur at the end of the school year.

The Business Office Procedures Manual contains detailed instructions regarding the amount and use of petty cash funds held at each campus. However, staff report that only one campus has a petty cash fund. Campuses use credit cards to handle most small emergency purchases. The CFO said that the Business Office does not audit petty cash funds at the campuses because the dollar amounts are immaterial.

Robust internal controls of cash handling provide districts with strong oversight of staff that process cash. Brownfield ISD's insufficient procedures and lack of internal controls for

FIGURE 3–12
BROWNFIELD ISD CAMPUS-BASED CASH COLLECTION
DECEMBER 2019

Cash handlers – teacher, coach, or adviser

Cash sources:

- picture and yearbook money;
- miscellaneous cash

- fund raisers;
- cell phone fees;
- parking permits;
- club dues;

- vending machines;
- concessions;
- T-shirts, stickers, pencils

Money will be held or deposited

Held

Deposited

Secretary places money in the campus vault until vendor picks it up or money is needed

Deposit slip has been generated

Deposit slip has not been generated

Secretary might or might not count the money to verify the amount

Secretary and another individual count the money, prepare the deposit slip, and code to the correct fund

Central office

Secretary will take the deposit to the central office

Secretary will not take the deposit to the central office

Central office and campus staff recount the money and reconcile the amount to the deposit slip

Secretary may keep a log of deposits

Deposit is logged and signed by both counting parties

Deposit is held in the campus vault until it is taken to the central office for deposit

Deposit is held in the central office vault until it is deposited

Secretary checks Skyward system to see when deposit is made to account and is available to spend

Deposit is made to the bank

Bank accounts are reconciled

SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

FIGURE 3–13
BROWNFIELD ISD CASH MANAGEMENT GUIDELINES COMPARED TO CAMPUS PRACTICES
DECEMBER 2019

CAMPUS-BASED CASH MANAGEMENT GUIDELINES	CAMPUS PRACTICES ALWAYS FOLLOW GUIDELINES	COMMENTS
1.1 Deposits should be balanced and taken to the business office weekly at a minimum.	No	Campus staff reported they take deposits to the Business Office with varying frequency. Deposits are taken daily, weekly, or less often than weekly. Cafeteria staff do not take deposits to the Business Office and instead take them directly to the bank.
1.2 Deposits should be kept in the campus vault at all times. Under no circumstances should collected funds be kept in a desk, classroom, purse or other unsecured location. Access to the vault should be limited to the campus principal and secretary.	No	Secretaries keep the money they receive in the vault and access to the vaults is limited. However, some campus staff hold funds and make their own deposits. These staff do not always bring funds to the campus secretaries to store in the vault.
1.2.1 All money collected by club sponsors, fund-raiser sponsors, teachers, secretaries, or principals should be processed for deposit on the day it is collected. If funds cannot be processed for deposit, they should be turned into the principal's office for placement in the campus vault until they can be processed for deposit. All funds should be processed for deposit within three days.	No	Some campus staff hold funds and make their own deposits. These staff do not always bring funds to the campus secretaries to store in the vault.
1.3 Under no circumstances should collected funds be transported by students to the office or any other secured location on campus.	Yes	Business Office logbooks show no student names.
1.4 All funds should be processed for deposit by counting and entering totals on the Fund-raiser Deposit Form (available online under the Business Office tab) by the depositor before deposit is taken to the campus secretary.	Yes	Deposit slips were used for all deposits observed by the Legislative Budget Board's School Performance Review Team.
1.4.1 All cash and coin should be listed by denomination.	Yes	The deposit slips observed by the review team appeared in compliance.
1.4.2 Checks should be entered separate from cash and listed individually. All checks should be made payable to Brownfield ISD and should be endorsed with a restrictive endorsement upon receipt (i.e., for deposit only).	Yes	The deposit slips observed by the review team appeared in compliance.
1.5 The campus secretary will then recount and verify the cash and check totals. After the total has been reconciled, the Fund-raiser Deposit Form will be signed by the campus secretary and depositor. A copy of the signed form will be given to the depositor.	No	Some deposits are given to the secretary to hold in sealed envelopes with the deposit slip inside. The secretary does not always open the envelope and recount until the envelope is taken to the Business Office.
1.6 The campus secretary will then take the deposit to the Business Office. Never send cash or any deposits through Inter-Department mail.	No	Some campus staff, including teachers and club sponsors take deposits directly to the Business Office and bypass the secretary entirely. Cafeteria staff do not take deposits to the Business Office and instead take them directly to the bank.

Sources: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

cash handling result in inconsistent practices across the district and place the district at risk for fraud and abuse.

Brownfield ISD should improve oversight of campus-based cash handling.

To implement this recommendation, the business manager should carry out the following tasks:

- strengthen the Business Office Procedures Manual to include the following tasks:

  ○ controls of the collection procedures, including the use of numbered receipts for incoming payments;

  ○ guidelines for deducting fund raiser expenses from cash deposited;

  ○ instructions for the handling and deposit of student fees described in the Elementary and Secondary student handbooks; and

  ○ procedures for retaining certain fees in the campus vaults;

- monitor and enforce the Business Office Procedures Manual requirements, including the centralized flow of cash through the campus secretary; and

- eliminate the petty cash funds, reconcile the accounts of any such funds that remain at the campus level, and return the remaining cash to the general fund.

The district could implement this recommendation with existing resources.

ASSET MANAGEMENT (REC. 21)

Brownfield ISD lacks procedures for the tagging, inventory, and disposal of district assets.

GASB Statement No. 34: Basic Financial Statements—and Management's Discussion and Analysis—for State and Local Governments defines capital assets as having the following qualities:

- tangible or intangible;

- used in operations; and

- have a useful life of more than one year.

According to FASRG, a district's capital assets can include land, land improvements, land use rights, buildings and building improvements, construction work in progress,

furniture and equipment, vehicles, machinery and equipment, works of art and historical treasures, monuments, infrastructure, computer software, and commercially available software.

Brownfield ISD Board Policy CFB (LOCAL) states that the capitalization threshold for purposes of classifying capital assets is $5,000. **Figure 3–14** shows the district's capital asset activity for the fiscal year that ended August 31, 2019. Brownfield ISD has approximately $12.0 million in net capital assets after depreciation.

FASRG requires districts to inventory capital assets periodically to perform the following tasks:

- identify and resolve discrepancies between the capital asset inventory list and what is on hand;

- maintain a list of fully depreciated assets still in use; and

- list and write off missing items in accordance with established internal policy, using journal entries that comply with generally accepted accounting principles.

To maximize control of capital assets, FASRG states that districts must keep a detailed subsidiary ledger that includes the following information:

- the asset purchased;

- date of purchase, construction, or acquisition;

- price paid to acquire and put the asset in place;

- expected useful life and disposal date of the asset;

- location of the asset;

- inventory number or identification code (for moveable items); and

- fund from which the asset was purchased.

The district's Business Office Procedures Manual states that the primary goal of the Business Office is "to protect the assets of the district and to ensure that all financial transactions are performed in accordance with generally accepted accounting practices." However, the manual contains no guidelines for how to document or inventory capital assets. A review of the district's capital asset list shows that Brownfield ISD does not document capital assets in accordance with FASRG requirements. **Figure 3–15** shows excerpts from Brownfield ISD's capital asset list. The excerpts show that this list contains various transactions relating to assets but it does not identify the expected useful life

FIGURE 3–14
BROWNFIELD ISD CAPITAL ASSET ACTIVITY
FISCAL YEAR 2019

TYPE	SEPTEMBER 1, 2018	ADDITIONS	DELETIONS	AUGUST 31, 2019
Land	$305,348	$0	$0	$305,348
Building and Improvements	$42,899,812	$59,772	$0	$42,959,584
Furniture and Equipment	$2,297,112	$1,543,404	$0	$3,840,516
Vehicles	$1,891,166	$652,812	$0	$2,543,978
Capital Lease Assets	$1,516,436	($1,516,436)	$0	$0
Construction in Progress	$0	$466,525	$0	$466,525
Total	**$48,909,874**	**$1,206,077**	**$0**	**$50,115,951**
Accumulated Depreciation				
Building and Improvements	$33,159,909	$1,015,496	$0	$34,175,405
Furniture and Equipment	$1,387,230	$688,651	$0	$2,075,881
Vehicles	$1,597,855	$243,646	$0	$1,841,501
Capital Lease Assets	$528,227	($528,227)	$0	$0
Total	**$36,673,221**	**$1,419,566**	**$0**	**$38,092,787**
Total Net Value of Capital Assets	**$12,236,653**	**($213,489)**	**$0**	**$12,023,164**

SOURCE: Brownfield ISD 2019 Annual Financial Report, fiscal year 2019.

and disposal date for each asset, the location of each asset, an inventory number, or an identification code.

Without the asset details required by FASRG, the district's capital asset list is inadequate for the purposes of performing an inventory. The following examples show the lack of useful details:

- item 185 in the Furniture and Equipment category is Parking Lot Repair, which is not an inventoriable asset;

- none of the items shown in Furniture and Equipment has a location. Without the model or manufacturer name for the equipment, locating the right piece of equipment during an inventory would be challenging;

- none of the items shown includes an identification code or number. As a result, distinguishing between the two 2017 71-passenger buses listed in the Capital Lease Assets category during an inventory would be challenging; and

- items 139, 146, 147, 148, 158 and 159 in the Vehicles category do not provide the make and model of the vehicle, and in some instances do not give the model year.

According to district staff, Brownfield ISD does not tag capital assets as it receives them, and campuses and departments order and receive assets without any guidance related to tagging or asset ownership from the Business Office. In addition, the Business Office does not conduct an annual inventory. Instead, district staff said that the external auditor has found no issues when performing tests of the capital asset inventory system. According to staff, the auditor uses for testing purposes a list of assets from the previous year that the CFO updates with any new additions or deletions from the current year. The district did not provide the review team a copy of the auditor's capital asset list, which staff said is separate from the other list provided by the district.

Although the district does not tag capital assets, information gathered during interviews indicates that the district has tagged and recorded in a database some assets that may not meet the $5,000 capitalization threshold. The technology director maintains an inventory of computers and other devices and software licenses. This practice aligns with guidance from FASRG, which states that "certain audiovisual or computer equipment may not be capitalized (i.e., recorded as a capital asset), but a listing of such assets and their location may be maintained for control and accountability purposes." However, the technology inventory is not comprehensive because the original database was lost to computer damage. The technology director has developed a new database that

FIGURE 3–15
BROWNFIELD ISD CAPITAL ASSET LIST EXCERPTS, FISCAL YEAR 2019

ASSET	PROPERTY	DATE IN SERVICE	BOOK COST	BOOK SEC. 179 EXP	BOOK SAL VALUE	DEPRECIATION			NET BOOK VALUE	METHOD	PERIOD
						PRIOR	CURRENT	END			
Capital Lease Assets											
327	Networking Equipment	1/1/2015	$1,191,175.70	$0.00	$0.00	$436,764.42	$119,117.57	$555,881.99	$635,293.71	S/L	10.00
338	2017 Bus 47 Passenger	8/31/16	$85,585.00	$0.00	$0.00	$24,452.86	$12,226.43	$36,679.29	$48,905.71	S/L	0.00
339	2017 Bus 71 Passenger	8/31/16	$89,000.00	$0.00	$0.00	$25,428.58	$12,714.29	$38,142.87	$50,857.13	S/L	7.00
340	2017 Bus 71 Passenger	8/31/16	$89,000.00	$0.00	$0.00	$25,428.58	$12,714.29	$38,142.87	$50,857.13	S/L	7.00
351	2016 G5 Bus 29 Passenger	11/01/16	$61,675.00	$0.00	$0.00	$16,152.97	$8,810.71	$24,963.68	$36,711.32	S/L	7.00
Furniture and Equipment											
185	Parking Lot Repair	8/1/2001	$38,230.00	$0.00	$0.00	$32,654.79	$1,911.50	$34,566.29	$3,663.71	S/L	20.00
187	Freezer Walk-In	1/1/1998	$12,500.00	$0.00	$0.00	$12,500.00	$0.00	$12,500.00	$0.00	S/L	7.00
188	Freezer Walk-In	1/1/2001	$12,500.00	$0.00	$0.00	$12,500.00	$0.00	$12,500.00	$0.00	S/L	7.00
189	Piano Baby Grand	1/1/1989	$8,556.00	$0.00	$0.00	$8,556.00	$0.00	$8,556.00	$0.00	S/L	10.00
192	Mixer 60-Quart Floor Model	1/1/1999	$7,000.00	$0.00	$0.00	$7,000.00	$0.00	$7,000.00	$0.00	S/L	7.00
193	Steam Kettle	1/1/1991	$7,575.00	$0.00	$0.00	$7,575.00	$0.00	$7,575.00	$0.00	S/L	7.00
195	Mat Tumbling/ Wrestling	1/1/1990	$5,000.00	$0.00	$0.00	$5,000.00	$0.00	$5,000.00	$0.00	S/L	7.00
197	Sound System	10/1/1996	$24,053.00	$0.00	$0.00	$24,053.00	$0.00	$24,053.00	$0.00	S/L	10.00
198	Stage Portable	6/1/2007	$10,895.54	$0.00	$0.00	$10,895.54	$0.00	$10,895.54	$0.00	S/L	10.00
202	Mixer 30-Quart	1/1/2000	$6,385.00	$0.00	$0.00	$6,385.00	$0.00	$6,385.00	$0.00	S/L	7.00
203	Piano	1/1/1994	$7,500.00	$0.00	$0.00	$7,500.00	$0.00	$7,500.00	$0.00	S/L	10.00
Vehicles											
138	Bus 70–79 Passenger Year 1998	10/01/98	$50,000.00	$0.00	$0.00	$50,000.00	$0.00	$50,000.00	$0.00	S/L	8.00
139	Pickup	01/01/02	$14,500.00	$0.00	$0.00	$14,500.00	$0.00	$14,500.00	$0.00	S/L	7.00
141	International Bus 71 Passenger	12/01/06	$67,395.00	$0.00	$0.00	$67,395.00	$0.00	$67,395.00	$0.00	S/L	8.00
142	International Bus 71 Passenger	12/01/06	$67,395.00	$0.00	$0.00	$67,395.00	$0.00	$67,395.00	$0.00	S/L	8.00
144	2006 Pickup Chevrolet 2500	10/01/06	$20,312.75	$0.00	$0.00	$20,312.75	$0.00	$20,312.75	$0.00	S/L	5.00
145	2004 Suburban	12/01/03	$31,954.75	$0.00	$0.00	$31,954.75	$0.00	$31,954.75	$0.00	S/L	5.00
146	2003 Pickup	10/01/03	$16,083.00	$0.00	$0.00	$16,083.00	$0.00	$16,083.00	$0.00	S/L	5.00
147	2003 Pickup	10/01/03	$16,083.00	$0.00	$0.00	$16,083.00	$0.00	$16,083.00	$0.00	S/L	5.00
148	2000 Pickup	8/1/1999	$16,600.00	$0.00	$0.00	$16,600.00	$0.00	$16,600.00	$0.00	S/L	5.00
156	1998 Bus 70–79 Passenger	10/01/98	$50,000.00	$0.00	$0.00	$50,000.00	$0.00	$50,000.00	$0.00	S/L	8.00
158	Vehicle	05/01/01	$17,131.00	$0.00	$0.00	$17,131.00	$0.00	$17,131.00	$0.00	S/L	5.00
159	2002 Pickup	09/01/01	$34,710.20	$0.00	$0.00	$34,710.20	$0.00	$34,710.20	$0.00	S/L	5.00

SOURCE: Brownfield ISD, December, 2019.

contains new items purchased by the district, but not older pieces of equipment that still are in use. In addition, at the end of the school year, the district does not inventory the items that the technology director tracks.

Brownfield ISD also lacks procedures for asset disposal, which is the removal of an asset from an organization's accounting records. A district may dispose of an asset that is depreciated fully or has been sold at a gain or loss because it is no longer useful or needed. During interviews, staff said that the recycling company contracted by the district to dispose of technology equipment provides a certificate of destruction for the devices it hauls away.

However, the lack of published guidelines for asset disposal has resulted in the district accumulating stored surplus property. During the onsite visit, staff said that some old furniture is stored in an abandoned cafeteria. According to staff, the district has disposed of some outdated textbooks but many are stored at the campuses. The district has not sold surplus items at auction for at least 10 years. Staff described a recent disposal process in which the district asked campus staff to place items for disposal in a dumpster, from which the Maintenance and Transportation Department took them to the landfill. The review team found no evidence that the district followed a formal disposal procedure or documented the disposal of these items.

In the absence of annual inventories, the district cannot hold campuses, departments, or staff accountable for the safeguarding of district property. 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, Brownfield ISD is at risk of violating state and federal guidelines for the disposal of assets purchased with federal or state pass-through grant funds. Identifying assets purchased with federal funding is a requirement of most grant awards that follow the Education Department General Administrative Regulations (EDGAR) guidelines. TEA has developed specific requirements for the disposal of these types of assets. District staff said that they do 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.

The district's upcoming bond projects and recent vehicle lease purchases intensify the need for formal asset disposal procedures. With the pending construction of a new high school and the renovation of the old high school for use by the middle school, the district will have multiple furnishings to either move, sell, or retain. District facilities may contain many items of value that the district no longer needs. The district may have purchased some of the assets with federal or state grant funds; therefore, the district will need to identify which surplus items were grant-funded, complete the appropriate documentation, and obtain approval before disposal. In addition, the district recently entered into a lease–purchase agreement for vehicles. As Brownfield ISD brings these new vehicles into service, it is likely that the district will retire some of its current fleet due to the vehicles' age and the inefficiency of continuing to service them.

Effective districts have forms that require the staff to list the asset, explain the reason for the disposal (e.g., obsolete, unrepairable, lost, stolen, etc.) and the method of disposal (e.g., sale, recycled, donated, etc.) Some school districts require prior approval before an asset can be disposed. If a district sells an item, the procedures also stipulate where to deposit the proceeds. Procedures often require documentation of lost or stolen items.

Some disposal policies stipulate that all property purchased with district funds belongs to the district, and staff must follow district guidelines to dispose of district property. This statement serves as notice that just because an asset is currently not in use, staff may not simply throw it away, take it home, or give it to a person or group without documenting the transaction.

To recoup some of the money invested in the district's assets, many districts use online auctions, physical auctions, and other means to sell surplus assets. Others identify other school districts or nonprofit organizations that need the surplus items and are eligible to accept donations of school district property.

Brownfield ISD should develop and implement controls to manage district assets efficiently.

The business manager should perform the following tasks:

- amend the Business Office Procedures Manual with procedures for how to conduct annual inventories, to reconcile annual inventories to the asset databases, and to dispose of assets, including assets purchased with federal funding. These procedures should follow EDGAR requirements to the extent possible;

- establish a process during the receipt of goods for tagging assets. The process should involve the

use of differentiated tags for assets purchased with federal funding so that the need for special handling is apparent;

- conduct the first inventory of assets at the end of the school year, during which staff should capture the missing data needed for the inventory databases, tag the assets, and identify any assets that should be removed from the lists;

- during the physical inventory recommended at the end of the school year, identify and tag the furniture and fixtures that were purchased with federal or state grant funds, identify items that might be retained for use at the new high school or the renovated middle school, and mark those items that could become surplus;

- after the list is completed, review the various disposal options and select those 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 first inventory will establish the baseline for all future inventories and may require significant time and effort to accomplish. The fiscal impact assumes that the district hires two temporary staff at each campus for one week to assist in the first inventory at a onetime cost of $6,240 (10 temporary staff x 40.0 hours at an hourly rate of $15.60). During subsequent years, existing staff should conduct the inventory without outside assistance. Disposing of surplus property will generate additional revenues for the district, but the actual amount cannot be estimated at this time.

BUSINESS OFFICE PROCEDURES MANUAL (REC. 22)

Brownfield ISD's Business Office Procedures Manual lacks key elements to ensure consistency, accountability, and compliance with state and federal regulations.

Board Policy CB (LOCAL) mandates that "the superintendent shall develop and enforce financial management systems, internal control procedures, procurement procedures, and other administrative procedures as needed to provide reasonable assurance that the district is complying with requirements for state and federal grants and awards." However, the district does not have written procedures to guide all Business Office functions.

Brownfield ISD's Business Office Procedures Manual was revised in October 2017. As discussed previously, the manual is missing key elements that would ensure compliance with FASRG and EDGAR guidelines.

Figure 3–16 shows the sections and topics included in the Business Office Procedures Manual.

Region 20 has developed templates that school districts can use to develop their own administrative procedures relating to finance, procurement, and travel. These templates were adapted to address FASRG requirements and matters dealing with federal and state grants, including a "framework for creating policies and procedures related to the administration of federal education programs." According to the template instructions, "it contains the internal controls and grant management standards … [school districts] must use to ensure that all federal funding are lawfully expended. It describes in detail financial management standards, including appropriate cash management procedures; allowability rules; property management protocols; time distribution procedures; record retention requirements; and self-monitoring and audit resolution procedures."

Figure 3–17 shows the topics included in the Region 20 Financial/Administrative Policies and Procedures Template, 2017, compared to those included in Brownfield ISD's Business Office Procedures Manual. As shown, the district's manual does not address most of these procedure topics.

As discussed previously, the district's lack of adequate procedures for asset management, budget development, and administration for grants, cash handling, compensation, and records retention has, in some instances, resulted in lost revenues and placed the district out of compliance with some state and federal guidelines.

Karnack ISD has an updated business procedures manual that covers all areas of its business operations, contains business forms and instructions, and includes procedures for student activity funds. The manual communicates policies and procedures to district staff, provides systematic procedures, and serves as a useful training tool for staff. The business manager and superintendent update the business procedures manual annually. The business manager also reviews the procedures contained in the manual with new staff and provides each a copy as a reference guide. By using documented business procedures, Karnack ISD provides a smooth transition for staff assigned to new jobs. The manual is also useful as a training tool and provides a consistent method for processing transactions, holds staff accountable,

and communicates expectations for complying with the district's business procedures.

Early ISD and Cameron ISD have effectively implemented a version of the Region 20 template and made their procedures available on their respective websites.

Brownfield ISD should develop comprehensive procedures to guide the daily functions of the Business Office and ensure that financial management activities adhere to best practices.

The business manager should perform the following tasks:

- revise the Business Office Procedures Manual to address the best practice topics shown in the Region 20 template. This manual should incorporate the existing procedures manual so that there are not separate manuals and one document contains all pertinent Business Office information;

- obtain feedback on the draft from all Business Office staff. Upon completion, the Business Office should post the Business Office Procedures Manual on the district's intranet site and share the link with all staff;

- require that Business Office staff conduct trainings on the manual with campus-level and district-level office staff; and

- review and revise the manual annually, or whenever significant changes occur.

The district could implement this recommendation with existing resources.

EXTERNAL AUDITOR (REC. 23)

Brownfield ISD has not established a policy to rotate external auditors periodically.

The Texas Education Code, Section 44.008(a), requires each school district to have its "fiscal accounts audited annually at district expense by a certified or public accountant holding a permit from the Texas State Board of Public Accountancy.

FIGURE 3–16
BROWNFIELD ISD BUSINESS OFFICE PROCEDURES MANUAL SECTIONS AND TOPICS
OCTOBER 2017

Section 1 – Introduction

Section 2 – Purchasing guidelines

1.0	General Purchasing Guidelines
2.0	Purchasing Legal/Local Requirements
3.0	Purchase Requisitions/Purchase Orders

Section 3 – Accounts payable guidelines

1.0	Accounts Payable Receiving
2.0	Accounts Payable Check Payment Schedule

Section 4 – Charge card guidelines

1.0	General Charge Card Guidelines
2.0	Charge Card Usage and Activity

Section 5 – Employee travel guidelines

1.0	Employee Travel Request Form
2.0	Employee Travel Settlement Form
3.0	Employee Meal Allowances
4.0	Employee Lodging
5.0	Employee Transportation

Section 6 – Student travel guidelines

1.0	Student Overnight Travel
2.0	Student Travel Process

Section 7 – Cash management guidelines

1.0	Campus Cash Management/Deposits
2.0	Business Office Cash Management/Deposits
3.0	Petty Cash

Section 8 – Activity fund guidelines

1.0	General Activity Fund Guidelines
2.0	Responsibility for Activity Funds
3.0	Activity Fund Categories
4.0	Expenditures from Activity Funds

SOURCE: Brownfield ISD Business Office Procedures Manual, October 2017.

FIGURE 3–17
REGIONAL EDUCATION SERVICE CENTER XX FINANCE PROCEDURES TEMPLATE TOPICS COMPARED TO BROWNFIELD ISD'S BUSINESS OFFICE PROCEDURES MANUAL, DECEMBER 2019

TOPIC	ADDRESSED IN BUSINESS OFFICE PROCEDURES MANUAL?
1.0 Introduction	Addressed
2.0 Waste, Fraud, and Abuse	Not addressed in Procedures Manual but appears in Board Policy CAA (LOCAL)
3.0 Organizational Information	Addressed

FIGURE 3–17 (CONTINUED)
REGIONAL EDUCATION SERVICE CENTER XX FINANCE PROCEDURES TEMPLATE TOPICS COMPARED TO BROWNFIELD ISD'S BUSINESS OFFICE PROCEDURES MANUAL, DECEMBER 2019

TOPIC	ADDRESSED IN BUSINESS OFFICE PROCEDURES MANUAL?
4.0 Financial Management System	Not addressed
Financial Management Standards	Not addressed
Financial Management/Accounting System	Not addressed
Budgeting	Not addressed
Budgeting for Federal and State Grants	Not addressed
Planning the Grant Budget	Not addressed
Reviewing and Approving the Budget	Not addressed
Submitting the Grant Application for Federal and State Awards	Not addressed
Accounting Records	Not addressed
Direct and Indirect Costs	Not addressed
Travel Costs – Refer to separate travel manual	Partially addressed
Field Trips	Not addressed
Cash Management – District level	Not addressed
Cash Management for Federal Funds	Not addressed
Local Cash/Check Handling	Partially addressed
Petty Cash	Addressed
Check Processing	Not addressed
Campus Activity Funds	Partially addressed
Student Activity Funds	Partially addressed
5.0 Procurement System	Partially addressed in a separate Procurement Manual
6.0 Property Management Systems	Not addressed
Property Classifications	Not addressed
Inventory Procedure	Not addressed
Inventory Records	Not addressed
Physical Inventory	Not addressed
Disposal of Equipment Purchased from Federal Funds	Not addressed
Disposal of Unused Supplies Purchased from Federal Funds	Not addressed
Disposal of Equipment and Unused Supplies Purchased from Non-Federal Funding	Not addressed
Sale of Surplus Property	Not addressed
7.0 Compensation Policies and Procedures	Not addressed in Procedures Manual or in Compensation Plan; some information appears in Employee Handbook
8.0 Record Keeping	Not addressed
Record Retention	Not addressed
Federal Requirements Regarding Record Retention	Not addressed
State Law Regarding Record Retention	Not addressed
Collection and Transmission of Records	Not addressed
Storage of Records	Not addressed
Destruction of Records	Not addressed
9.0 Self-Monitoring and Audit Resolution	Not addressed
Audits	Not addressed
Audit Resolution	Not addressed

Sources: Regional Education Service Center XX, Financial/Administrative Policies and Procedures Template, 2017; Brownfield ISD Business Office Procedures Manual, October 2017.

The audit must be completed following the close of each fiscal year" and submitted to TEA.

FASRG describes the rules for financial accounting, including the selection of an auditor and the requirements for the audit. In accordance with FASRG, school district financial audits are intended to provide reasonable assurance about whether the financial statements of the audited entity present fairly the district's status in the following categories:

- financial position;

- results of operations; and

- cash flows or changes in financial positions in accordance with generally accepted accounting principles.

Financial audits also determine whether the school district has complied with laws and regulations for those transactions and events that may have a material effect on the financial statements.

Board Policy CFC (LEGAL) includes the requirements in the Texas Education Code, Section 44.008; however, the board has not established a local policy for implementing the state requirements. Audit reports provided by the district show that Bolinger, Segars, Gilbert & Moss, LLP, has conducted the five most recent external audits of Brownfield ISD, from fiscal years 2015 to 2019. The audits for these years have been unmodified, with no reported deficiencies or material weaknesses. According to district staff, this firm also performed the district's annual audits for several years before fiscal year 2015. District staff stated that they use the same audit firm because no firms in local or neighboring communities can provide this service.

According to FASRG guidelines, "if the auditor's compliance report and/or the auditor's report on internal controls disclose areas of noncompliance with laws, rules, or regulations; questioned amounts; or material weaknesses, the school district must file comments on any such findings and recommendations with the Division of Financial Compliance at TEA. This filing should include a plan for corrective action (taken or planned) and comments on the status of corrective action taken on prior findings, or reasons that corrective action is not necessary."

Although Brownfield ISD's external auditor did not report any findings in the audits reviewed, the district received two management letters regarding the fiscal year 2016 and 2017 audits, which identified internal control and other operational matters presented for the district's consideration. However, matters presented in management letters do not affect audit report findings, and the district is not required to submit a corrective action plan to TEA.

The management letter dated December 2017 raised concerns that the district was not in compliance with the following requirements:

- the maintenance-of-effort requirements of the federal Individuals with Disabilities Education Act, Part B;

- the gifted and talented special allotment requirements; and

- the high school special allotment requirements.

In the management letter dated November 2018, the auditors again pointed to the district's possible noncompliance with gifted and talented allotment requirements. The letter stipulates that these matters do not affect the auditor's report on the district's financial statements.

Although the long-term use of the same audit firm can provide benefits, such as institutional knowledge of the district's operations, this practice increases the risk that the auditors do not maintain objectivity and independence. According to the Center for Audit Quality, "the technical competence of the external auditor alone is not sufficient to ensure a high-quality audit. The external auditor also must exercise a high level of objectivity and professional skepticism." Long-term auditor–client relationships may decrease auditor objectivity when auditors become more trusting of clients' assertions. The downside to rotating audit firms periodically is the loss of institutional knowledge. Hiring new firms may increase costs due to the additional time required for the auditor to become familiar with the organization's structure and systems. In some instances, a more desirable approach is to have the audit firm periodically rotate the assigned auditors.

FASRG describes the rules for financial accounting, including the selection of an auditor and the requirements for the audit. It contains detailed instructions and guidelines regarding contracting for audit services, including a Sample Request for Qualifications in Appendix 1 that specifies among the elements that an interested accounting firm should include in its proposal "satisfactory evidence of capability to provide in a professional and timely manner the services stated in the Request for Qualifications. To meet this requirement … [the firm should] describe staff rotation plans for audit team members if this is to be a multiyear contract."

The review team could not find evidence of rotation of audit team members for the district's annual financial audits.

Brownfield ISD should implement measures to ensure that auditors perform the district's annual financial audit with objectivity and independence.

To accomplish this, the board should perform the following tasks:

- adopt a policy of rotating auditors within a firm or audit firms every five years and issue a request for qualifications for audit services;

- ensure that the staff rotation provision is included in multiyear contracts;

- examine the current contract for services with the audit firm and determine whether a provision that requires the periodic rotation of auditors exists and is being implemented; and

- if such a provision exists, verify how the firm is following this provision and determine whether changes to the language are required to ensure independence.

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 promptly address them. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team identified a fiscal impact for the following recommendations:

RECOMMENDATIONS	2020–21	2021–22	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
3. BUSINESS MANAGEMENT							
13. Develop a proactive budget-planning approach to connect spending with identified needs and goals.	$317,454	$317,454	$317,454	$317,454	$317,454	$1,587,270	$0
18. Implement controls to improve contract management functions.	($52,000)	($52,000)	($52,000)	($52,000)	($52,000)	($260,000)	$0
19. Strengthen the district's charge card guidelines to include more detailed procedures and establish internal controls to comply with the guidelines.	$23,708	$23,708	$23,708	$23,708	$23,708	$118,540	$0
21. Develop and implement controls to manage district assets efficiently.	$0	$0	$0	$0	$0	$0	($6,240)
Total	**$289,162**	**$289,162**	**$289,162**	**$289,162**	**$289,162**	**$1,445,810**	**($6,240)**

4. HUMAN RESOURCES MANAGEMENT

Brownfield Independent School District's (ISD) chief financial officer also serves as the human resources director. Although the district does not have a formal human resources department, the chief financial officer/human resources director, along with various district and campus staff, conducts human resources tasks including recruitment, compensation, compliance, personnel records, employee relations, and the district's hiring and separation processes. During school year 2018–19, Brownfield ISD employed 274.9 full-time-equivalent positions, including 124.7 teacher full-time-equivalent positions.

ACCOMPLISHMENT
♦ Brownfield ISD has implemented policies and procedures to improve teacher recruitment.

FINDINGS
♦ Brownfield ISD's human resources function is dispersed among various positions and lacks clear documentation, which limits staff's efficiency and ability to access critical information and support.

♦ Brownfield ISD does not maintain and monitor documentation of mandatory staff trainings effectively.

♦ Brownfield ISD's records retention procedures are incomplete and do not address all required records.

♦ Brownfield ISD lacks sufficient guidelines for stipends and allowances and does not differentiate effectively pay based on experience.

RECOMMENDATIONS
♦ **Recommendation 24: Define, document, and communicate all human resources roles and responsibilities.**

♦ **Recommendation 25: Develop a mandatory staff training system and assign central oversight of this training to the assistant superintendent.**

♦ **Recommendation 26: Update records retention procedures and provide training for relevant staff.**

♦ **Recommendation 27: Evaluate the staff compensation system and develop detailed documentation to administer the compensation system and extra-duty pay.**

BACKGROUND

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

Figure 4–1 shows the organization of Brownfield ISD's human resources (HR) function. The chief financial officer (CFO)/HR director manages the HR functions and supervises an HR secretary. As an ancillary function of their primary position, various district and campus staff also perform HR tasks. These staff include the superintendent, assistant superintendent, Business Office staff, campus principals, department managers, and the superintendent's secretary. The Brownfield ISD department managers are the director of maintenance and transportation, food services director, and technology director.

Brownfield ISD district and campus staff with 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 files; and
- distribute and collect staff evaluations.

FIGURE 4–1
BROWNFIELD ISD HUMAN RESOURCES ORGANIZATION
SCHOOL YEAR 2019–20
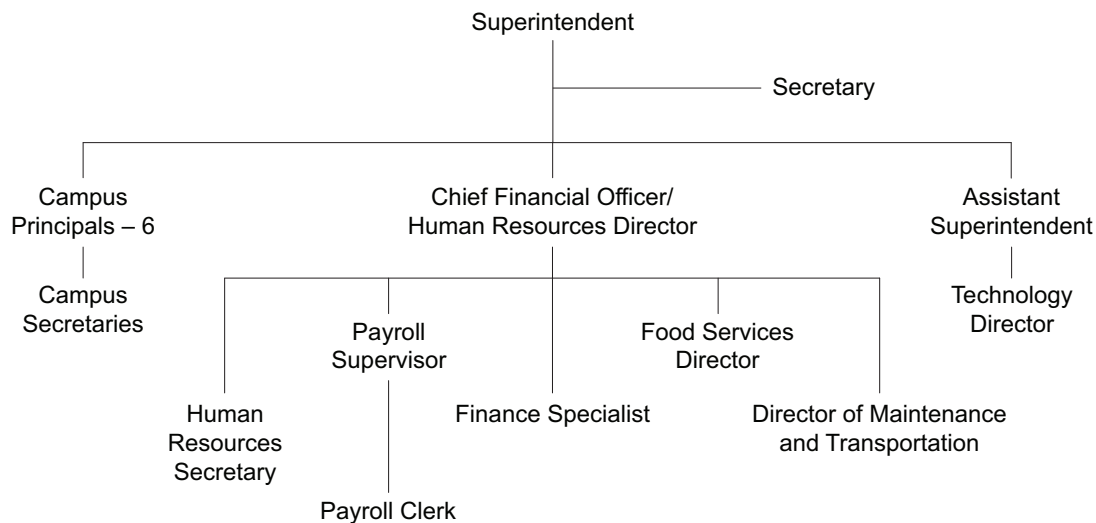
NOTE: Brownfield ISD does not have a formal human resources department; these staff perform some human resources roles in the district.
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

During school year 2018–19, Brownfield ISD employed 274.9 full-time-equivalent (FTE) positions to provide services to 1,725 students. **Figure 4–2** shows Brownfield ISD's budgeted payroll expenditure as a percentage of all funds compared to its peer districts during school year 2018–19. Peer districts are districts similar in size and other characteristics to Brownfield ISD that are used for comparison purposes. Payroll expenditures for all five districts ranged from $9.3 million to $15.2 million. Brownfield ISD's payroll accounted for 68.8 percent of its total expenditures, which is the second greatest among peer districts.

Figure 4–3 shows the percentage of staff in five categories for Brownfield ISD compared to those of its peer districts. During school year 2018–19, Brownfield ISD employed the second-lowest percentage of teachers, the highest percentage of professional support, and the second-highest percentage of auxiliary staff.

Figure 4–4 shows the student-to-teacher ratios and student-to-staff ratios for Brownfield ISD and its peer districts. Brownfield ISD has a student-to-teacher ratio of 13.8 and a student-to-staff ratio of 6.3, which both are less than all its peer districts.

FIGURE 4–2
BROWNFIELD ISD ACTUAL PAYROLL EXPENDITURES COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2018–19

CATEGORY	BROWNFIELD ISD	BISHOP CISD (1)	KERMIT ISD	LITTLEFIELD ISD	WEST OSO ISD
Total operating expenditures (in millions)	$15.0	$13.8	$13.4	$10.5	$20.1
Payroll expenditures (in millions)	$12.0	$11.2	$10.4	$8.9	$14.9
Payroll as a percentage of total operating expenditures (2)	79.7%	81.0%	77.4%	84.4%	73.9%
Total Staff FTE positions (3)	274.9	183.1	191.4	191.6	317.7
Total Teacher FTE positions	124.7	105.1	82.6	95.6	149.2
Student Enrollment	1,725	1,521	1,471	1,350	2,087

NOTES:
(1) CISD=consolidated independent school district.
(2) Reported percentages may not match percentages calculated with rounded expenditures.
(3) FTE=full-time-equivalent positions.
SOURCES: Texas Education Agency, Public Education Information Management System, Actual Financial Data, and Texas Academic Performance Report, school year 2018–19.

FIGURE 4–3
BROWNFIELD ISD PERCENTAGE OF STAFF TYPES COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2018–19 (1)

STAFF	BROWNFIELD ISD	BISHOP CISD (2)	KERMIT ISD	LITTLEFIELD ISD	WEST OSO ISD
Teachers	**45.4%**	57.4%	43.2%	49.9%	47.0%
Auxiliary staff	**27.1%**	24.0%	26.2%	22.7%	32.0%
Educational aides	**13.7%**	7.1%	20.4%	18.8%	9.0%
Professional support	**8.9%**	5.9%	4.9%	4.2%	7.4%
Administrative staff	**5.0%**	5.6%	5.3%	4.3%	4.6%

NOTES:
(1)   Percentages may not sum to 100.0 percent due to rounding.
(2)   CISD=consolidated independent school district.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2018–19.

FIGURE 4–4
BROWNFIELD ISD STUDENT-TO-TEACHER AND STUDENT-TO-STAFF RATIOS COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2018–19

TYPE OF RATIO	BROWNFIELD ISD	BISHOP CISD	KERMIT ISD	LITTLEFIELD ISD	WEST OSO ISD
Student-to-Teacher	**13.8**	14.5	17.8	14.1	14.0
Student-to-Staff	**6.3**	8.3	7.7	7.0	6.6

NOTE: CISD=consolidated independent school district.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2018–19.

DETAILED ACCOMPLISHMENT

RECRUITMENT

Brownfield ISD has implemented policies and procedures to improve teacher recruitment.

District staff reported that Brownfield ISD historically experienced challenges in the hiring process because of the delay between identifying qualified applicants at job fairs and offering them positions. District staff and campus principals reported that candidates were hired by other districts during the time required for Brownfield ISD to make formal offers, especially considering the district's close proximity to Lubbock's highly competitive teaching market.

The board adopted Board Policy DC (LOCAL) in February 2019 delegating to the superintendent final authority for hiring new staff. The board president stated that the decision to authorize the superintendent to hire without board approval was a strategy intended to enable the immediate hiring of high-quality teachers at job fairs. The superintendent provides the board with a list of hew hires and positions filled; this provision functions as an information item rather than an agenda item requiring board approval. The board president reported that, considering the board's limited ability to evaluate candidate qualifications and the ultimate responsibility of the superintendent for staff, this policy makes the district's hiring process more efficient.

The assistant superintendent maintains a list of job fairs and develops a rotating schedule for leadership staff and principals to attend them. The schedule enables the assistant superintendent, CFO/HR director, or superintendent and principals representing primary and secondary grade levels to attend each job fair. During spring 2019, district representatives attended job fairs at Lubbock Christian University, Wayland Baptist University, Texas Tech University, West Texas A&M University, Angelo State University, and the Tri-University Teacher Fair.

Before attending job fairs, the superintendent, assistant superintendent, and CFO/HR director, meet with the principals to discuss what positions each principal is seeking to hire, particularly in high-need areas. Principals coordinate to determine which candidates have the best potential for each campus instead of competing for candidates that have certifications that meet needs on multiple Brownfield ISD campuses.

If the superintendent does not attend a fair, principals or other attending district leaders contact the superintendent to authorize an immediate offer. The HR secretary conducts background checks of candidates and prepares offer letters for approved candidates, the superintendent signs the letters, and the HR secretary emails the offer letters to the candidates. The hiring process, supported by board policy, enables timely, efficient hiring of qualified candidates at recruitment events.

DETAILED FINDINGS

HUMAN RESOURCES ORGANIZATION (REC. 24)

Brownfield ISD's human resources function is dispersed among various positions and lacks clear documentation, which limits staff's efficiency and ability to access critical information and support.

Brownfield ISD does not have a dedicated HR department. The Legislative Budget Board's School Performance Review Team visited the district during December 2019. At the time of the review team's onsite visit, the CFO/HR director had primary responsibility for HR in the district. District and campus staff have assigned roles and responsibilities to conduct HR functions.

Figure 4–5 shows the HR functions in the district and the position or positions with related roles and responsibilities assigned.

As shown in **Figure 4–5**, Brownfield ISD's HR functions are not streamlined and are conducted by a large number of various staff. Although the CFO/HR director and the HR secretary have some HR training and contacts with HR networks, other staff that are assigned HR roles and responsibilities have limited HR training, are not members of professional HR organizations, and lack significant HR experience.

Additionally, HR roles and responsibilities are implemented through institutional knowledge, and the district lacks

FIGURE 4–5
BROWNFIELD ISD HUMAN RESOURCES ROLES AND RESPONSIBILITIES, SCHOOL YEAR 2019–20

HUMAN RESOURCES (HR) FUNCTION	POSITION(S) WITH ROLES AND RESPONSIBILITIES ASSIGNED
Overall management of HR functions	Chief financial officer (CFO)/HR director
Maintenance of Employee Handbook, Compensation Manual, and Employee Policies	CFO/HR director
Job posting, receipt of applications, coordinating interviews	CFO/HR director, leadership team (1), HR secretary, department managers (2)
Teacher recruitment	Assistant superintendent, principals
Background checks, fingerprinting	HR secretary
New hire onboarding	HR secretary, CFO/HR director, payroll supervisor
Terminations, exit interviews	Principals, department managers, CFO/HR director, payroll supervisor
Employment verification	HR secretary, CFO/HR director
Performance evaluations	CFO/HR director, HR secretary
Workers' compensation	CFO/HR director, principals, department managers, payroll clerk
Leave accounting	CFO/HR director, department managers, principals, payroll supervisor, finance specialist
Employee relations, discipline management, grievances	Superintendent, CFO/HR director, assistant superintendent, principals, department managers, superintendent's secretary, the district's attorneys
Benefits – new and open enrollment	Payroll supervisor, payroll clerk, HR secretary
Maintaining personnel files	HR secretary, payroll supervisor
Annual contracting, nonrenewal letters, letters of reasonable assurance for noncontract staff leaving for the summer	Assistant superintendent, principals, department managers, CFO/HR director, HR secretary
Staff development monitoring and tracking	Principals, department managers, HR secretary

NOTES:
(1) Leadership team consists of the superintendent, assistant superintendent, and CFO/HR director.
(2) Department managers include the director of maintenance and transportation, food services director, and technology director.
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

comprehensive written procedures to guide district and campus staff in carrying out these roles and responsibilities. The CFO/HR director has limited oversight and monitoring of staff that complete these HR tasks.

The district's website, documents for staff, and internal communications do not define clearly nor communicate the organization of HR in the district and provide Brownfield ISD staff with insufficient information about how to access HR support.

The district has multiple documents that address HR-related issues. For example, the Brownfield ISD employee handbook addresses topics, including employment, leaves and absences, and complaints and grievances. The Business Office procedures manual addresses some HR topics, and the district's website provides some related staff forms, such as staff travel request forms, direct deposit forms, employee travel settlement forms, and mileage reimbursement logs. Many important HR topics are addressed in the district's publications; however these documents are not comprehensive and provide insufficient guidance regarding the implementation of HR policies, procedures, and regulations.

Figure 4–6 shows a comparison of the Brownfield ISD employee handbook and industry best practices.

The high school campus also published a school year 2019–20 staff handbook, *The Teacher Handbook and Survival Guide 2019–20*. The majority of the information in it relates to roles and activities carried out at the high school campus; however, some sections regard HR topics, including professional expectations and teacher absences. The district lacks a process to ensure that HR-related staff review drafts of staff publications to ensure that they represent all HR guidelines, rules, and regulations accurately and consistently.

The district's lack of clearly defined, documented, and communicated HR roles results in additional risk for the district because the CFO/HR director planned to leave employment at the district in December 2019. District staff reported that an informal transition plan was in place to reorganize the Business Office and reassign the HR roles of the current CFO/HR director. At the time of the review team's onsite visit, the district had not provided a written transition plan to Brownfield ISD staff with updated information about how to access HR support. During onsite interviews, Brownfield ISD staff reported that they lacked a clear understanding of the transition plan and how their HR roles and responsibilities would change after the CFO/HR director left.

Brownfield ISD's lack of comprehensive written procedures increases the risk of noncompliance with critical federal and state HR regulations because multiple staff in the district are responsible for HR-related functions. Considering the CFO/HR director's absence, the district may lack sufficient professional expertise regarding federal and state personnel and labor laws and guidelines, placing the district at additional risk.

As a result of the fragmented HR roles and incomplete documentation for HR staff and for users, the review team identified multiple inconsistencies and issues for Brownfield ISD staff.

For example, staff insurance benefit administration is the primary responsibility of the payroll supervisor and the district's third-party administrator. However, new staff do not receive the benefits guide as part of their new hire documentation. District staff reported difficulty obtaining information about benefits and did not know consistently which Brownfield ISD staff were designated to provide support.

The district's limited HR support and oversight has led to inconsistencies in HR procedures among food services staff and other hourly staff and limited understanding of new procedures for affected staff. Brownfield ISD adopted a compensatory time system food services staff beginning in school year 2019–20. In a compensatory time system, staff accrue compensatory time when they work more than 40.0 hours per week. The district awards compensatory time to its staff instead of overtime pay. During onsite interviews, food services staff and cafeteria managers were unaware of how the district's compensatory time system worked. They were uncertain when the district authorized using compensatory time, how it is accrued, and the period that staff have available to use accrued time. Additionally, the staffing structure of the Food Services Department requires all staff to be present daily for the cafeterias to operate effectively. As a result, Food Services Department staff reported difficulty scheduling when they could use any compensatory time that they accrue. Overall, staff interviewed said that they were frustrated and confused by the district's compensatory time system, and several staff stated that the frustration harmed staff morale.

Brownfield ISD's HR structure also affected worker's compensation claims. The Texas Association of School Boards (TASB), a professional organization supporting Texas school districts, provides worker's compensation coverage for the district through the TASB Risk Management Fund. The

FIGURE 4–6
BROWNFIELD ISD EMPLOYEE HANDBOOK HUMAN RESOURCES INFORMATION
SCHOOL YEAR 2019–20

TOPIC	BROWNFIELD ISD REFERENCE	COMPARISON TO INDUSTRY BEST PRACTICE
Exhausted sick leave – additional 10 days granted when sick leave is exhausted	Not covered	Lacks explanation that includes required medical certification, the charges deducted from daily rate by employee category, and how this leave influences federal Family and Medical Leave Act and Sick Leave Pool.
Prorating and paying salaries for hourly and salaried staff employed more than 12 months	Not covered	Lacks an explanation of the process and the way this pay method will affect deductions for insurance, etc. Lacks explanation of how overtime and compensatory time will be earned and paid through this pay method.
13-month check option for new teachers	Not covered	Lacks explanation of how this option works and how new staff can exercise it.
Paychecks	Paychecks section contains erroneous statement: "Hourly employees are paid every two weeks."	Information provided should be accurate, and corrections should be communicated clearly to staff.
Grievances and complaints	Grievances and Complaints section contains reference to Board Policy DGBA (LOCAL), and neither the policy nor the handbook provides a complaint form.	Lacks the entire policy in the handbook or a more detailed summary of the process, including the chain of command to be followed and a link to the grievance form referenced in policy.
Grievances and complaints	Board Policy DGBA (LOCAL) states, "The District shall inform employees of this policy through appropriate District publications."	Lacks references to detailed references to grievances.
Five extra days paid in teacher contracts – the administration of those extra days, particularly when the teacher exits district employment during the school year	Not covered	Lacks clear explanation of the topic.
Leave payouts upon termination	The handbook discusses leave proration regarding leave that was granted in advance at the beginning of the year, but makes no mention of payouts for accumulated leave. Reference is made in the Personal Leave section and referred to in the Local Leave section: "State personal leave accumulates without limit, is transferable to other Texas school districts, and generally transfers to education service centers."	Lacks an explanation of the district's policy or position regarding the payout of local and state leave balances at the time of termination and lacks an online link to information regarding the options for the disposition of state leave.
Leave accounting, time clocks, and the use of systems	The handbook discusses the amount and type of leave available to staff, but it does not explain the use of the substitute management system, digital time clock system, or the supervisor signoff process. The Overtime Compensation section states, "Weekly time records will be maintained on all nonexempt employees for the purpose of wage and salary administration."	Lacks an explanation that all staff, including teachers, must track their leave, and lacks an explanation of where leave balances and pay stubs can be found. Handbook does not discuss the approval process for timesheets in the digital time clock system or the substitute management system, does not include a document containing this information, and does not provide an online link to the employee handbook for reference.
Travel expense reimbursement	Handbook restates Board Policy DEE (LEGAL) but does not link to or reference the Business Office procedures manual that provides more detailed information.	Does not provide references or links to where staff can find more detailed information or forms.

Sources: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

payroll clerk enters the first report of accidents before TASB administers the process. However, the Business Office procedures manual provides no reference to the handling of staff accidents. The requirement to report staff accidents immediately is referenced in several sections in the employee handbook, but the handbook does not provide forms or detailed instructions for documentation and reporting. During focus groups and interviews with department managers, they indicated that they were uncertain about the steps to follow regarding a staff injury or accident. Department managers said that they did not know where to obtain the necessary forms or the type of investigation and documentation that were required.

Brownfield ISD's HR structure and limited documentation restrict the effectiveness of the employee grievance process. Brownfield ISD staff are expected to obtain the employee grievance forms from the superintendent's administrative assistant in the central office. Most staff surveyed were unfamiliar with the steps of the district's grievance process, and, during interviews, many staff stated that they did not know what the process was or whom to contact for support.

Effective school districts provide clear information about HR staff and document how to access HR support. Effective districts maintain comprehensive, documented operating procedures. Documented procedures help districts develop work standards, ensure consistency, implement overall operational efficiency, and preserve institutional knowledge in when staff are absent or leave employment with the district.

To ensure coordinated HR functions and compliance with federal and state HR regulations, some effective small districts have an HR generalist position or identify staff to coordinate every aspect of the HR function similarly. Districts that have effective HR functions have staff designated to advise administrators in all HR practices, to provide staff with information regarding regulations and policies, and to provide general support for all HR functions. The Society for Human Resource Management (SHRM), a major national professional organization for HR, provides a sample job description for an HR generalist position. **Figure 4–7** shows the purpose, required knowledge, skills, and primary responsibilities for this position.

Spring ISD maintains a website page dedicated to worker's compensation that includes sequential instructions for staff and supervisors, copies of the forms to be completed by the employee and the supervisor, and contact information for additional questions.

College Station ISD publishes an employee handbook that provides staff with detailed information, including sequential instructions for the grievance process.

Brownfield ISD should define, document, and communicate all human resources roles and responsibilities.

The superintendent and leadership team should evaluate the district's current HR structure and consider options to restructure or consolidate HR tasks among a smaller number of district staff.

The superintendent should designate a primary staff for HR responsibilities, ensure that the designated staff gains the training necessary to execute the functions identified fully, and prioritize the training based on the district's needs. The superintendent should ensure that this staff joins at least one HR-affiliated professional association for additional educational and networking opportunities with other HR professionals. The HR generalist job description could serve as a reference point to develop the staff position's roles and responsibilities.

The superintendent and designated HR staff should document and communicate HR roles to all staff clearly. This documentation should include a reference guide by task to help staff access HR support. District staff should update procedures manuals to include procedures for all HR roles and responsibilities and revise the employee handbook to include all critical information with sufficient detail for staff. The district should ensure that all necessary staff forms, including those for worker's compensation and grievances, are readily available to all staff.

The fiscal impact assumes that the district joins a professional HR organization, such as SHRM, for a cost of $219 for the professional membership fee. Any additional fiscal impact of the recommendation depends on the district's method of implementation and could not be determined.

STAFF TRAINING (REC. 25)

Brownfield ISD does not maintain and monitor documentation of mandatory staff trainings effectively.

The district has not identified a position to coordinate staff development for district-level staff. The assistant superintendent, with campus principals, manages instructional staff professional development. However, the assistant superintendent does not maintain central tracking of required mandatory staff training or training records for district staff, including food service, maintenance, technology, and custodial staff.

FIGURE 4–7
HUMAN RESOURCES GENERALIST JOB DESCRIPTION, DECEMBER 2019

The human resources (HR) generalist will run the daily functions of the HR department including hiring and interviewing staff, administering pay, benefits, and leave, and enforcing company policies and practices.

Supervisory Responsibilities:

• May oversee the scheduling, assignments, and daily workflow of subordinate staff in the department.
• May assist with constructive and timely performance evaluations.

Duties/Responsibilities:

• Reviews, tracks, and documents compliance with mandatory and nonmandatory training, continuing education, and work assessments. This may include safety training, anti-harassment training, professional licensure, and aptitude exams and certifications.
• Recruits, interviews, and facilitates the hiring of qualified job applicants for open positions; collaborates with departmental managers to understand skills and competencies required for openings.
• Conducts or acquires background checks and employee eligibility verifications.
• Implements new hire orientation and employee recognition programs.
• Performs routine tasks required to administer and execute human resource programs, including but not limited to compensation, benefits, and leave; disciplinary matters; disputes and investigations; performance and talent management; productivity, recognition, and morale; occupational health and safety; and training and development.
• Handles employment-related inquiries from applicants, employees, and supervisors, referring complex and/or sensitive matters to the appropriate staff.
• Attends and participates in employee disciplinary meetings, terminations, and investigations.
• Maintains compliance with federal, state, and local employment laws and regulations, and recommended best practices; reviews policies and practices to maintain compliance.
• Maintains knowledge of trends, best practices, regulatory changes, and new technologies in human resources, talent management, and employment law.
• Performs other duties as assigned.

Required Skills/Abilities:

• Excellent verbal and written communication skills.
• Excellent interpersonal, negotiation, and conflict resolution skills.
• Excellent organizational skills and attention to detail.
• Excellent time management skills with a proven ability to meet deadlines.
• Strong analytical and problem-solving skills.
• Ability to prioritize tasks and to delegate them when appropriate.
• Ability to act with integrity, professionalism, and confidentiality.
• Thorough knowledge of employment-related laws and regulations.
• Proficient with Microsoft Office Suite or related software.
• Proficiency with or the ability to quickly learn the organization's HRIS and talent management systems.

Education and Experience:

• Bachelor's degree in human resources, business administration, or related field required.
• At least one year of human resource management experience preferred.
• SHRM-CP a plus.

NOTE: HRIS=Human Resource Information System; SHRM-CP=Society of Human Resource Management-Certified Professional.
SOURCE: Society for Human Resource Management, December 2019.

School district staff typically are required to participate in mandatory training applicable to all staff and job-specific training that may be required by external agencies. **Figure 4–8** shows examples of board policies regarding mandatory staff training referenced in the school year 2019–20 employee handbook.

Brownfield ISD has not designated HR staff with the role of monitoring and oversight of mandatory staff training. Individual department managers and campus principals are responsible for conducting and tracking staff training. Department managers reported that no other district staff check the records that they maintain for their respective staff,

FIGURE 4–8
EXAMPLES OF BROWNFIELD ISD BOARD POLICIES REGARDING MANDATORY STAFF TRAINING
SCHOOL YEAR 2019–20

BOARD POLICY	TOPIC	EMPLOYEE HANDBOOK REFERENCE
DBA (LEGAL); DBA (LOCAL); DMA (LEGAL)	Health safety training	Certain employees that are involved in physical activities for students must maintain and submit to the district proof of current certification or training in first aid, cardiopulmonary resuscitation (CPR), the use of an automated external defibrillator (AED), concussion, and extracurricular athletic activity safety. Certification or documentation of training must be issued by the American Red Cross, the American Heart Association, University Interscholastic League, or another organization that provides equivalent training and certification. Employees subject to this requirement must submit their certification or documentation to Personnel Office by September 1, 2019. School nurses and employees that have regular contact with students must complete a Texas Education Agency-approved, online training regarding seizure disorder awareness, recognition, and related first aid.
DMA (LEGAL)	Staff development	Staff development activities are organized to meet the needs of employees and the district. Staff development for instructional personnel is predominantly campus-based, related to achieving campus performance objectives, addressed in the campus improvement plan, and approved by a campus-level advisory committee. Staff development for noninstructional personnel is structured to meet specific licensing requirements (e.g., bus drivers) and continued employee skill development. Individuals holding renewable State Board for Educator Certification certificates are responsible for obtaining the required training hours and maintaining appropriate documentation.
CLB (LEGAL), CLB (LOCAL), DI (LEGAL)	Pest control treatment	Employees are prohibited from applying any pesticide or herbicide without appropriate training and prior approval of the integrated pest management (IPM) coordinator.

Sources: Legislative Budget Board School Performance Review Team; Brownfield ISD, Board Policy Manual, school year 2019–20.

and that they are not required to submit any records to the central office.

In the absence of a compilation of the training and professional development considered to be required or mandatory for all staff and by job classification, Brownfield ISD does not monitor the departmental files to determine whether staff are meeting requirements and following board policies.

Brownfield ISD has no central electronic tracking system for staff development; therefore, all monitoring of completed training is manual and prone to error. Staff risk noncompliance unless the department manager or principal maintains a reminder system to notify when staff are required to retake certain training.

During onsite interviews, Food Services Department staff reported receiving less continuing education than required previously. The U.S. Department of Agriculture and the Texas Department of Agriculture have training requirements for food service staff. These requirements enable food service staff to complete required trainings within a one-year or two-year range. Directors, managers, and other staff have separate training requirements. At the time of the review team's onsite visit, none of Brownfield ISD's Food Services Department staff had met these training requirements. District staff were not yet in violation of these requirements. However, these staff have limited time available for trainings.

Without effective oversight of mandatory staff training, the district cannot ensure that staff are in compliance for all certifications and continuing education hours and that staff have adequate training to conduct their work safely and effectively.

Effective districts coordinate staff development on departmental, campus, and district levels. Some districts use electronic tracking systems to track staff professional development activities. Culberson County–Allamore Consolidated ISD in Van Horn utilizes a centralized database that tracks all required trainings. District staff use the system to notify staff of the schedule of required trainings and to verify that all staff receive all mandatory trainings. This system also provides documentation for internal or external auditors and transparency for all stakeholders.

Brownfield ISD should develop a mandatory staff training system and assign central oversight of this training to the assistant superintendent.

The assistant superintendent should compile a list of mandatory training required for all staff and a list of additional training that is required by each staff classification. The compilation should show the training intervals and total training hour requirements.

The assistant superintendent should use the compilation to develop and maintain a database of all mandatory staff trainings to monitor that campuses and departments conduct required trainings and to maintain associated documentation. The assistant superintendent should coordinate with principals and department managers to plan and schedule mandatory trainings and update the database regularly as laws and regulations change.

The district could implement this recommendation with existing resources.

RECORDS RETENTION (REC. 26)

Brownfield ISD's records retention procedures are incomplete and do not address all required records.

The HR function in school districts includes development, maintenance, and oversight of records. Brownfield ISD Board Policies CPC (LEGAL) and CPC (LOCAL) address office management and records management and designate the superintendent as the district's records management officer. By policy, the superintendent is responsible for understanding and complying with the Local Government Records Act, the Texas Local Government Code, Chapters 201 to 205, and for ensuring that custodians of records and other applicable district staff are trained on the district's records management program, including policy and corresponding procedures. The district maintains a records retention procedure document including 43 record types and their retention length. However, the document contains limited information regarding records and no specific procedures or guidelines for staff regarding the storage or handling of these documents.

The handling and completion of student records is covered in detail in the district's secretary handbook; however, the retention of those records is mentioned briefly as being stored at the central office for five years. The district does not maintain detailed operating procedures or provide sufficient training regarding the proper management of records, including student and staff records and legal and business-related documents.

Brownfield ISD's records retention procedure lacks sufficient detail to comply with Texas State Library and Archives Commission (TSLAC) guidelines for records management. TSLAC's Local Schedule SD: Retention Schedule for Records of Public School Districts establishes mandatory minimum retention periods, provides a comprehensive list of these records and their retention period, and provides additional clarifications.

TASB publishes procedures to guide school districts in the implementation of TSLAC-compliant records management. **Figure 4–9** shows a comparison of Brownfield ISD's records management procedures and TASB's guidelines for record management procedures. Brownfield ISD's procedures for record storage, managing record collections, and training are limited and do not meet TASB's best practice recommendations.

Brownfield ISD's master staff files are well-organized and based on a checklist of documents that are required to be kept in the files. The primary staff file folders that the review team observed included performance evaluation documents, which, according to TSLAC's Schedule SD, are permanent records. Each folder also contained a section for confidential information; however, none of the file folders contained any documents in that tab section. The CFO/HR director said that the only confidential information kept in the staff folders would be disciplinary documents. However, teacher performance evaluations are considered confidential documents.

The HR secretary maintains separate notebooks for all staff that contain confidential information including income tax-related forms and copies of driver licenses and Social Security cards. Although the master staff files are stored in a locked office, the HR secretary keeps the staff notebooks at her desk and locks them in the secure room with the master staff files each night. The payroll supervisor maintains separate staff files that include a copy of the employee's driver license, Social Security card, income tax-related forms, and garnishment or other withholding authorizations. The payroll supervisor stores these files in an unlocked cabinet in that position's office; because they are copies, the files may be stored or destroyed at will.

Each campus manages and stores student records. Campus secretaries reported that paper student records are kept in a vault or locked room, are labeled with a date, and are destroyed after five years. The campus secretary procedures manual directs that records should be stored for five years at the central office.

FIGURE 4–9
BROWNFIELD ISD AND TEXAS ASSOCIATION OF SCHOOL BOARDS (TASB) RECORD MANAGEMENT PROCEDURES
SCHOOL YEAR 2019–20

ACTIVITY	TASB RECOMMENDED PROCEDURES	BROWNFIELD ISD PROCEDURES
Record storage	Develop procedures for storage and management of personnel and other district records; ensure that storage area is fireproof and that all records are protected from destruction by water damage, corruption, and theft; control access to records that may contain confidential information; and organize records so that district stores only records that correlate to Texas State Library and Archives Commission (TSLAC) retention guidelines	The district developed procedures for handling campus-based student records and a procedure showing the retention periods for 43 types of documents, but no procedures for the storage and management of personnel and other district records; records are not stored consistently in a designated storage area that is fireproof and protected from destruction; access to records with confidential information is not controlled consistently; and records are not separated or secured consistently in a way that differentiates between permanent records and those with retention dates designated by TSLAC; records retained at the campus and department levels have minimal central office oversight
Manage record collection	Separate records that are permanent from records that have a retention date; secure permanent records; organize records by record type as outlined in the TSLAC schedule and clearly mark their destruction dates on boxes; organize boxes by their destruction dates; and annually schedule destruction of nonpermanent records that have met their retention dates	Records are not managed consistently to include separating and securing all types of records that TSLAC designates as permanent; the district does not organize records consistently by record type as outlined in the TSLAC schedule or organize boxes by destruction date; and the district maintains confidential containers for shredding by an external vendor; some records are destroyed annually
Training	Train district staff on establishing records management procedures; provide guidance on annual purging and organization of records	Responsibility for records retention is decentralized; district staff are not trained regularly on establishing records management procedures; and the district provides limited guidance regarding annual purging and organization of records

SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019; Texas Association of School Boards, Organizing Personnel Records, September 15, 2010.

The district records retention procedure states that "after the time period for retention has passed, the CFO/HR director will oversee destruction of the records. The CFO/HR director will keep a list of what has been destroyed." During interviews with district and campus staff, they were not able to describe clearly a process for preapproval for records destruction or for notifying the CFO/HR director of the destruction of records at the campuses.

Insufficient written procedures and training have resulted in inconsistent implementation of board policy and procedures and discrepancies with state guidelines. The practice of destroying student records after five years may

be appropriate for some records, but TSLAC's guidelines include keeping some types of student records permanently. Board policy requires compliance with state laws and guidelines; however, it is not apparent that staff follow the guidelines. For example, Brownfield ISD's procedure includes various types of contracts that have different retention periods, depending on the type of contract. Original contract documents are not stored centrally consistently; department managers have responsibility for the retention of those records based on the type of contract, with little central office guidance or oversight. Retention of personnel records and the appropriate destruction of those records relates to both state and federal compliance.

Best practices dictate that school districts should have clear records management procedures to ensure compliance with board local and legal policies, such as those outlined by TASB. Effective districts have comprehensive records management systems that help the districts maintain accurate records and assist in compiling documentation to meet federal, state, and local laws and regulations. Accurate and consistent records management can decrease litigation exposure, protect staff, and improve efficiency. Additionally, it is sound business practice to maintain records of the terms of each staff's employment relationship with the school district.

Waxahachie ISD has developed a comprehensive records management process that includes physical security, monitoring for content completeness, and periodic auditing to ensure compliance with federal and state law and local government retention regulations. The HR Department keeps critical files in a fireproof vault and segregates sensitive documents from the staff files in a separate locking file cabinet.

Brownfield ISD should update records retention procedures and provide training for relevant staff.

The superintendent should ensure that the records retention list is complete and includes accurate retention periods, that documented procedures exist for the destruction of records, and that staff are trained regularly on the records retention process.

The district should identify and separate confidential information within each staff file. Any copies of confidential documents kept in the Business Office for daily reference should be secured while they are in use and locked in the secure room at all other times.

The district could implement this recommendation with existing resources.

COMPENSATION (REC. 27)

Brownfield ISD lacks sufficient guidelines for stipends and allowances and does not differentiate effectively pay based on experience.

Stipends and allowances are a significant part of salary expenses in the district. During school year 2018–19, stipends and allowances totaled more than $492,000 and accounted for 4.5 percent of total salary expenditures.

The district's compensation manual provides little guidance related to extra-duty pay, including stipends and allowances.

The compensation manual provides a schedule of stipend amounts by type of stipend. However, the manual does not document the expectations of each position, the evaluation required to receive the stipend, criteria for selection, or criteria for stipend renewal. Additionally, the district awards allowances to some staff for automotive, cellular telephone, and technology costs.

The CFO/HR director reported that stipends are addressed within the budget planning process through stipend planning worksheets that are distributed to campus principals and department managers. Principals and department managers indicate the number of planned stipends and explain any increases in the number of stipends. Although the compensation manual includes the names and amounts of stipends, it provides no guidance regarding the overall amount of stipends that can be awarded.

Figure 4–10 shows the number and amount of the stipends awarded from school years 2016–17 to 2018–19. The cost of stipends has increased by nearly $68,000 during this period, although student enrollment has decreased. Extracurricular stipends represent the largest number and expenditure of stipends.

The review team observed inconsistencies with the stipends awarded. For example, the single largest stipend, $20,000, was awarded to a campus principal for providing leadership training and is categorized as miscellaneous. This category is not listed in the compensation manual and appears to be used for extra pay that has not been defined previously and has varying expectations. The amount of this miscellaneous stipend is twice the amount of the highest listed stipend and is awarded to an administrator, although stipend guidelines discourage awarding stipends to administrators.

Additionally, the review team observed inconsistencies between the naming conventions used in staff salary files and in the compensation manual. During school years 2016–17 to 2018–19, the district awarded four stipends in the category called nurse, 10-month, for $2,000 each. However, the compensation manual lists three separate nursing stipends, none of which correspond to the number of months worked.

The review team also observed that some individual staff receive a large number of separate stipends. Without clear expectations for receiving compensation for extra duties and criteria for selection, this awarding practice could result in negative impressions that the district's compensation system lacks equity and transparency.

FIGURE 4–10
BROWNFIELD ISD STIPENDS, SCHOOL YEARS 2016–17 TO 2018–19

STIPEND	2016–17		2017–18		2018–19		PERCENTAGE CHANGE (2)
	AWARDED	TOTAL EXPENDITURE (1)	AWARDED	TOTAL EXPENDITURE	AWARDED	TOTAL EXPENDITURE	
Extracurricular Stipends							
Band, 10-month	2	$5,920	0	$0	0	$0	(100.0%)
Band, 11-month	2	$15,000	4	$21,000	4	$21,000	40.0%
Cheerleading	3	$4,500	4	$7,000	5	$9,000	100.0%
Choir	2	$5,000	2	$5,000	2	$5,000	0.0%
Coach	29	$248,540	27	$232,220	23	$220,060	(11.5%)
National Honor Society	1	$1,000	2	$4,000	2	$4,000	300.0%
National Junior Honor Society	2	$500	2	$2,000	2	$2,000	300.0%
Pep Squad	1	$500	0	$0	0	$0	(100.0%)
Silver Spoons	1	$1,500	2	$4000	1	$2,000	33.3%
Student Council	3	$1,900	4	$6,000	4	$6,000	215.8%
Theater Arts	3	$6,000	3	$7,500	3	$7,500	25.0%
Trainer	1	$10,000	1	$10,000	1	$10,000	0.0%
UIL (3)	2	$2,000	2	$3,500	3	$4,500	125.0%
Yearbook	2	$1,600	2	$3,000	2	$3,000	87.5%
Instructional Stipends							
Core Subject	0	$0	18	$15,750	14	$11,965	100.0%
Counselor, 11-month	4	$6,000	5	$10,000	5	$10,000	66.7%
CTE Certification (4)	1	$500	1	$500	1	$500	0.0%
Department Chair	0	$0	8	$28,000	8	$28,000	100.0%
Diagnostician, 11-month	2	$3,000	2	$2,520	2	$3,000	0.0%
District Testing Coordinator	1	$5,000	1	$4,580	1	$5,000	0.0%
Dyslexia	0	$0	1	$3,500	2	$7,000	100.0%
Math	12	$21,600	11	$19,800	12	$40,200	86.1%
Migrant	0	$0	1	$5,000	0	$0	N/A
Nurse, 10-Month	4	$8,000	4	$8,000	4	$8,000	0.0%
Pharmacy Technician	0	$0	1	$6,000	1	$6,000	100.0%
Reading	0	$0	1	$800	2	$1,600	100.0%
Science	5	$9,000	8	$14,100	9	$15,900	76.7%
Speech	1	$3,000	1	$3,000	1	$3,000	0.0%
Teacher, 12-Month	1	$10,000	1	$10,000	1	$10,000	0.0%
Miscellaneous Stipends							
Accounts Payable	0	$0	1	$2,751	1	$3,000	100.0%
Miscellaneous	4	$35,920	2	$21,832	3	$26,500	(26.2%)
Total Stipends	**89**	**$405,980**	**122**	**$461,353**	**119**	**$473,725**	**16.7%**

NOTES:
(1) All expenditures are rounded to the nearest dollar.
(2) Percentage change is calculated from school years 2016–17 to 2018–19.
(3) UIL=University Interscholastic League.
(4) CTE=career and technical education.
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

FIGURE 4–11
BROWNFIELD ISD ALLOWANCES
SCHOOL YEARS 2016–17 TO 2018–19

ALLOWANCE	SCHOOL YEAR 2016–17		SCHOOL YEAR 2017–18		SCHOOL YEAR 2018–19		PERCENTAGE CHANGE (2)
	AWARDED	TOTAL EXPENDITURE (1)	AWARDED	TOTAL EXPENDITURE	AWARDED	TOTAL EXPENDITURE	
Auto	2	$9,600	3	$8,587	1	$8,700	(9.4%)
Phone	16	$9,593	17	$9,213	16	$8,676	(9.6%)
Technology	1	$3,000	2	$2,117	1	$1,500	(50.0%)
Total Allowances	**19**	**$22,193**	**22**	**$19,917**	**18**	**$18,876**	**(14.9%)**

NOTES:
(1)   Allowance expenditures are rounded to the nearest dollar.
(2)   Percentage change is calculated from school years 2016–17 to 2018–19.
SOURCES: Legislative Budget Board School Performance Review Team, December 2019; Brownfield ISD, school years 2016–17 to 2018–19.

The district's process for awarding allowances for automotive, cellular telephone, and technology also is not defined clearly. Eligibility and requirements for these allowances are not documented clearly. During onsite interviews, some district staff stated that they are uncertain who qualifies for the allowance and whether they also qualified for this compensation.

Figure 4–11 shows the number and amount of the allowances awarded from school years 2016–17 to 2018–19. The district awarded approximately $18,876 in allowances during school year 2018–19, and the number of allowances and total cost decreased each year during the period.

The district publishes a compensation manual and a salary schedule for teachers, librarians, and registered nurses (RN). The compensation manual provides few instructions for implementation and does not address salary information for teachers, librarians, and RNs that have more than 20 years of experience.

The district's salary schedule for teachers, librarians, and RNs provides inconsistent salary increases based on experience, and includes limited compensation incentives for the most experienced educators.

Figure 4–12 shows a comparison between Brownfield ISD's salary schedule and the state minimum salary schedule for school year 2019–20. Brownfield ISD's salaries for educators with from zero to five years of experience are considerably greater than the state minimums. At the sixth year of experience, the difference begins to narrow, and by the tenth year district salaries begin to equal the state's minimum.

Teachers in Brownfield ISD that teach for 20 years can expect to be paid 33.1 percent more than a new teacher, whereas the state schedule provides that a teacher that has 20 years of experience would earn 62.0 percent more than a new teacher.

Considering the large percentage of district funds expended for staff payroll, insufficient guidelines and monitoring of stipends and allowances could result in the inefficient expenditure of district resources. The district's ineffective oversight of stipends risks that staff could be compensated for duties that they did not effectively fulfill. Some staff reported a perception that stipends had been awarded inappropriately; therefore, the district's lack of transparency regarding qualifications for stipends could influence morale negatively.

Brownfield ISD's salary structure may not compensate highly experienced educators effectively, which could limit the district's ability to retain and recruit veteran educators.

TASB provides guidance for school districts related to systems of compensation. The TASB publication *Getting the Most Out of Stipends* states that "conducting a comprehensive audit of all stipends paid will reveal which are appropriate and which should be eliminated. Maintaining a simple and market-based stipend schedule can help districts keep competitive and pay in fair and compliant ways for extracurricular duty assignments."

Effective districts establish compensation systems and differentiate compensation to improve recruitment and retention of experienced teachers. Effective districts also maintain detailed operating procedures for the implementation of a comprehensive compensation manual.

Niles Township Schools in Illinois publishes detailed job descriptions for stipends. The description for a club sponsor stipend, for example, includes the title, reporting relationship,

FIGURE 4–12
BROWNFIELD ISD AND STATE MINIMUM SALARY SCHEDULES (1)
SCHOOL YEAR 2019–20

YEARS EXPERIENCE	BROWNFIELD ISD		STATE MINIMUM		DIFFERENCE	
	ANNUAL SALARY	ANNUAL PERCENTAGE INCREASE	ANNUAL SALARY	ANNUAL PERCENTAGE INCREASE	AMOUNT	PERCENTAGE
0	$41,000		$33,660		$7,340	21.8%
1	$41,400	0.98%	$34,390	2.17%	$7,010	20.4%
2	$41,700	0.72%	$35,100	2.06%	$6,600	18.8%
3	$42,200	1.20%	$35,830	2.08%	$6,370	17.8%
4	$42,500	0.71%	$37,350	4.24%	$5,150	13.8%
5	$43,000	1.18%	$38,880	4.10%	$4,120	10.6%
6	$43,300	0.70%	$40,410	3.94%	$2,890	7.2%
7	$43,600	0.69%	$41,830	3.51%	$1,770	4.2%
8	$43,900	0.69%	$43,170	3.20%	$730	1.7%
9	$45,500	3.64%	$44,440	2.94%	$1,060	2.4%
10	$45,900	0.88%	$45,630	2.68%	$270	0.6%
11	$46,770	1.90%	$46,770	2.50%	$0	0.0%
12	$47,940	2.50%	$47,850	2.31%	$90	0.2%
13	$49,100	2.42%	$48,850	2.09%	$250	0.5%
14	$50,170	2.18%	$49,810	1.97%	$360	0.7%
15	$51,220	2.09%	$50,710	1.81%	$510	1.0%
16	$51,570	0.68%	$51,570	1.70%	$0	0.0%
17	$52,540	1.88%	$52,370	1.55%	$170	0.3%
18	$53,450	1.73%	$53,140	1.47%	$310	0.6%
19	$54,340	1.67%	$53,860	1.35%	$480	0.9%
20	$54,590	0.46%	$54,540	1.26%	$50	0.1%
	Range Spread=33.10%		**Range Spread=62.00%**			

NOTE: (1) Salary schedules apply to classroom teachers, full-time librarians, full-time counselors, and full-time registered nurses.
SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Minimum Salary Schedule; Brownfield ISD, compensation manual, school year 2019–20.

position statement, an essential functions section including 19 detailed functions carried out by the position, goals of the club, calendar, expected hours per week, and description of how the position will be evaluated.

Brownfield ISD should evaluate the staff compensation system and develop detailed documentation to administer the compensation system and extra-duty pay.

The district should evaluate extra-duty pay and determine whether it is appropriate to include the duties in a new or existing classification or to make scheduling or other adjustments that facilitate the assigned work to be performed as a core function.

The district should require department managers or district leaders to develop detailed and consistent expectations for each stipend duty, and should not pay stipends unless such descriptions and expectations are in place. The documented expectations should include clear and measurable goals and functions to be performed, which will provide the evaluation of the employee's performance and the basis for continuation of the stipend each year.

District staff should revise the compensation manual to include more comprehensive procedures for implementation of compensation. District staff should document in the compensation manual how teachers that have reached the maximum years listed on the salary schedule will be

compensated. One option is to state that these staff will be eligible for board-approved cost-of-living increases. Or the district could establish increases based on a percentage of an experienced teacher's current salary. The district should update the compensation manual annually.

The district's revised compensation manuals should include clear job descriptions for all extra-duty pay including stipends and allowances. The descriptions for stipends and allowances should include expected duties, time commitments, the process used to determine that duties are performed before awarding or renewing stipends, and the maximum number of stipends by type that will be awarded. The district should ensure that information in the revised compensation manual, including stipend naming conventions, is used consistently, including in budgeting and financial reporting.

The district should adopt a revised teacher salary scheduled with a greater range spread to provide consistent annual increases and differentiated compensation for experienced staff. The district could accomplish this change in multiple ways, such as adopting a teacher salary schedule that has a range spread of 45.0 percent to 60.0 percent, consistent with an annual increase of at least 1.0 percent to 3.0 percent per year of experience. **Figure 4–13** shows an example salary schedule that the district could consider.

Alternatively, the district could consider adopting a teacher salary schedule directly based on the state minimum schedule. For example, Brownfield ISD could adopt a policy of paying all levels of teachers $2,000, $3,000, or $4,000 greater than the state minimum. In this way, district teachers' salaries would not be as low as the state minimum, which is the case for Brownfield ISD teachers that have 10 or more years of experience.

The fiscal impact assumes that the district decreases the amount of stipends and allowances to 3.5 percent of total salary, a decrease of 1.0 percent, resulting in an annual savings of $110,190 ($492,601 total school year 2018–19 stipends and allowances - $382,411 total stipends and allowances decreased by 1.0 percent). The fiscal impact for adjusting the compensation system for experienced teachers could not be assumed, because the cost varies based on the district's method of implementation.

FIGURE 4–13
SAMPLE SALARY SCHEDULE, DECEMBER 2019

YEARS EXPERIENCE	ANNUAL SALARY	ANNUAL INCREASE
0	$41,000.00	
1	$41,820.00	2.0%
2	$42,656.40	2.0%
3	$43,509.53	2.0%
4	$44,379.72	2.0%
5	$45,267.31	2.0%
6	$46,172.66	2.0%
7	$47,096.11	2.0%
8	$48,038.03	2.0%
9	$48,998.80	2.0%
10	$49,978.77	2.0%
11	$50,978.35	2.0%
12	$51,997.91	2.0%
13	$53,037.87	2.0%
14	$54,098.63	2.0%
15	$55,180.60	2.0%
16	$56,284.21	2.0%
17	$57,409.90	2.0%
18	$58,558.10	2.0%
19	$59,729.26	2.0%
20	$60,923.84	2.0%

Source: Legislative Budget Board School Performance Review Team, December 2019.

FISCAL IMPACT

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

The Legislative Budget Board's School Performance Review Team identified a fiscal impact for the following recommendations:

RECOMMENDATIONS	2020–21	2021–22	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
4. HUMAN RESOURCES MANAGEMENT							
24. Define, document, and communicate all human resources roles and responsibilities.	($219)	($219)	($219)	($219)	($219)	($1,095)	$0
27. Evaluate the staff compensation system and develop detailed documentation to administer the compensation system and extra-duty pay.	$110,190	$110,190	$110,190	$110,190	$110,190	$550,950	$0
Total	**$109,971**	**$109,971**	**$109,971**	**$109,971**	**$109,971**	**$549,855**	**$0**

5. FACILITIES USE AND MANAGEMENT

Brownfield Independent School District (ISD) has six campuses, an early childhood center, two elementary school campuses; one middle school campus; one high school campus; and the Brownfield Education Center, a split program that includes a Disciplinary Alternative Education Program and an educational credit recovery program. Brownfield ISD has approximately 562,967 square feet of facilities. These buildings range in age from nine years to 79 years. The district employs 30 maintenance and custodial staff including the director of maintenance and transportation.

FINDINGS

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

♦ Brownfield ISD does not have a process to determine the extent of its facilities' deferred maintenance needs and corresponding potential costs.

♦ Brownfield ISD lacks a formal process to manage, measure, and monitor its energy use.

RECOMMENDATIONS

♦ **Recommendation 28: Establish a five-year facilities master plan and update the plan annually.**

♦ **Recommendation 29: Contract for a comprehensive facilities condition assessment, and develop and implement a preventive maintenance program.**

♦ **Recommendation 30: Develop and implement an energy management plan to conserve energy and reduce energy costs in compliance with state law and board policy.**

BACKGROUND

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

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, the same staff may be responsible for custodial and grounds keeping tasks. Facilities planning establishes district priorities, allocates resources and funds, and identifies facility goals. 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.

Brownfield ISD's director of maintenance and transportation oversees the Maintenance and Transportation Department, which is responsible for facilities maintenance, code compliance, custodial services, and other areas relating to district facilities. **Figure 5–1** shows the reporting structure in the Maintenance and Transportation Department.

This chapter discusses the maintenance function of the Maintenance and Transportation Department; see the **Transportation Management and Fleet Operations** chapter for a discussion of the transportation function.

Brownfield ISD manages its own custodial services and employs 24 custodial staff. The district employs three general maintenance workers, a head grounds keeper, and a grounds worker. The general maintenance workers maintain mechanical equipment and district facilities. The grounds workers maintain the landscaping and grounds surrounding district facilities.
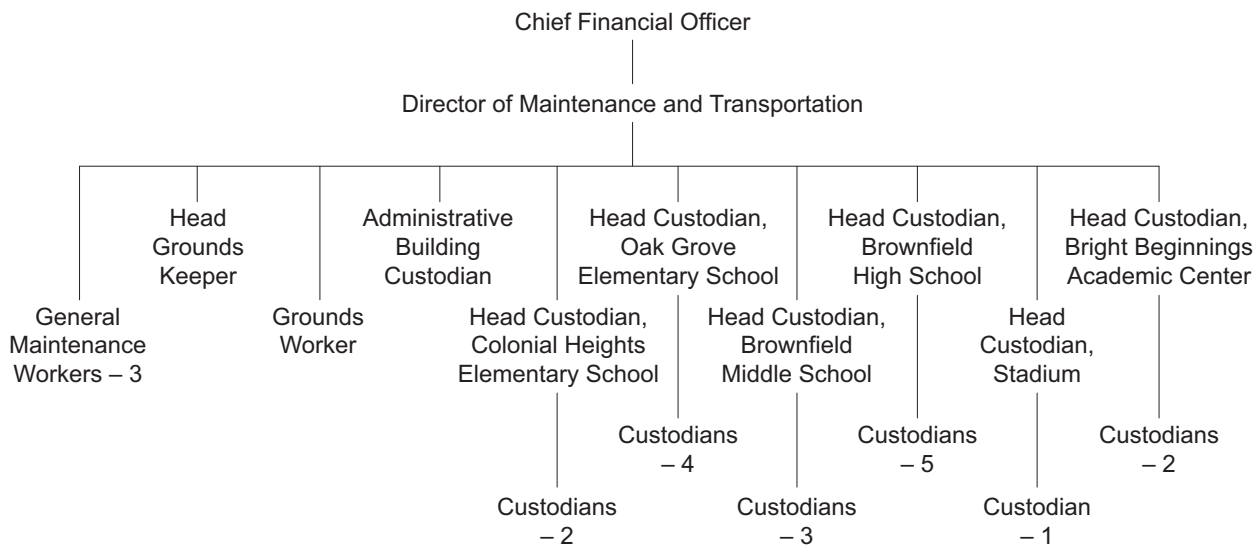
Figure 5–2 shows Brownfield ISD campuses and their student populations for school year 2018–19.

Figure 5–3 shows Brownfield ISD's facilities, including year of construction and square footage for each.

In May 2019, voters approved a $40.0 million facilities bond package for Brownfield ISD, which finances the following construction and renovation project plans:

• construct a new high school on land owned by Brownfield ISD east of the existing high school to

FIGURE 5–1
BROWNFIELD ISD MAINTENANCE AND TRANSPORTATION DEPARTMENT (1), SCHOOL YEAR 2019–20

```
                              Chief Financial Officer
                                      │
                      Director of Maintenance and Transportation
                                      │
   ┌──────────────┬──────────────┬──────────────┬──────────────┬──────────────┐
  Head        Administrative   Head Custodian,  Head Custodian,  Head Custodian,
  Grounds      Building        Oak Grove        Brownfield       Bright Beginnings
  Keeper       Custodian       Elementary School High School     Academic Center
   │              │                │                │                │
 General       Grounds       Head Custodian,   Head Custodian,      Head
 Maintenance   Worker        Colonial Heights  Brownfield          Custodian,
 Workers – 3                 Elementary School Middle School        Stadium
                                 │                │                │
                             Custodians       Custodians        Custodians
                                – 4              – 5               – 2
                                 │                │                │
                             Custodians       Custodians        Custodian
                                – 2              – 3               – 1
```

NOTE: (1) Figure shows the maintenance function of the Maintenance and Transportation Department.
SOURCES: Legislative Budget Board School Performance Review Team, December 2019; Brownfield ISD, school year 2019–20.

include the following core academic areas; a science, technology, engineering and math lab; career and technical education facilities; a fine arts space for band, theater arts classroom, and choir; and a new competition gymnasium and practice gymnasium. The district estimates it will complete the new high school by the end of calendar year 2021;

• renovate the existing high school and repurpose it as the Brownfield Middle School;

• partially demolish and perform asbestos abatement at the existing middle school; the auditorium and gymnasium areas would remain, with new entrances constructed to enable community access and use;

• construct secure entrances and visitor screening areas at all campuses with the exception of Bright Beginnings Academic Center; and

• install new playgrounds at Colonial Heights Elementary and Oak Grove Elementary schools.

The bond process began by utilizing a facilities study and condition assessment conducted on Brownfield Middle School in fall 2018. This assessment reported an estimated cost of $27.0 million to repair and renovate the middle school in accordance with district standards. In response, Brownfield ISD established a Citizens Bond Committee that consisted of

FIGURE 5–2
BROWNFIELD ISD CAMPUSES AND STUDENT ENROLLMENT SCHOOL YEAR 2018–19(1)

CAMPUS	ENROLLMENT
Bright Beginnings Academic Center	151
Colonial Heights Elementary School	230
Oak Grove Elementary School	498
Brownfield ISD Education Center	27
Brownfield Middle School	361
Brownfield High School	458
Total	**1,725**

NOTE: (1) School year 2018–19 is the most recent campus data available at the time of the onsite visit.
SOURCE: Texas Education Agency, Texas Academic Performance Report school year 2018–19.

community representatives. The committee met regularly to review the results of the facility study and master-planning options to address facility needs. The committee recommended the need for a bond election to the Brownfield ISD Board of Trustees (board). After reviewing options for addressing the district's operational, instructional, and safety needs, the Citizens Bond Committee, district staff, and the board collectively agreed upon a plan to move the middle school to the current high school campus, partially demolish the current middle school, and construct a new high school campus.

FIGURE 5–3
BROWNFIELD ISD FACILITY INFORMATION
CALENDAR YEAR 2016

FACILITY	YEAR OF CONSTRUCTION	SQUARE FOOTAGE
Brownfield High School	1971 – renovated in 1980 and 2000	149,344
Brownfield Middle School	1950 – additions completed in 1963 and 2000	121,407
Oak Grove Elementary School	1960 – additions completed in 2000	101,251
District Athletic Fields	2000 – the Field House was built in 2014	49,824
Colonial Heights Elementary School	1954 – additions completed in 1971, 1977, and 2000	48,753
Administrative Building (1)	1941	25,659
District Transportation Complex	1963 – additions completed in 2009	24,283
Bright Beginnings Academic Center	1990	17,643
District Maintenance Complex	Maintenance Office – 1973; Warehouse and Maintenance Shop – 1941	13,730
Agriculture Farm	2000	11,073
Total		**562,967**

NOTE: (1) The Brownfield Education Center is part of the Administrative Building.
SOURCE: Texas Association of School Boards, Risk Management Assessment, 2016.

DETAILED FINDINGS

FACILITIES PLANNING (REC. 28)

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

In 2013, Brownfield ISD commissioned a report of district facilities, which emphasized the need for the district to implement a comprehensive facility master planning process. The report stated:

> It is important that Brownfield ISD create a facility master plan for its long-term use. The district needs to deal with existing space needs and program needs; Brownfield ISD should become as aggressive with the process of replacing and upgrading schools for long-term use as well as addressing anticipated growth needs. The needs are substantial and will become more serious. Solutions for both program and space needs should be based on well-defined planning guidelines that reflect the district's instructional program and values. Given the complexity and interrelatedness of the various facility needs, master planning activities should be addressed urgently. A districtwide master plan will help determine the sequence for schools to be built, updated and/or redeveloped, or liquidated and sites to be acquired.

The Legislative Budget Board's School Performance Review Team found that Brownfield ISD has not addressed the concerns included in the 2013 report. Information gathered from onsite interviews with Brownfield ISD staff indicated that the district does not have a facilities master plan and that the district does not engage in several key elements of long-term facilities planning.

A facilities master plan provides guidelines for future construction and renovation programs. Effective plans demonstrate organizational commitment to facilities maintenance. Plans may include short-term and long-term objectives, budgets, and timelines. A comprehensive master plan also may include the following elements:

- an extensive evaluation of the condition and educational functionality of existing buildings and sites;

- a capacity analysis of all district education facilities, reflecting the district's instructional program;

- an evaluation of each campus and facility to determine its best use, considering local programs and state staffing and space requirements;

- a determination of technology capabilities within existing facilities;

- information relative to school facilities conformance to state and federal mandates;

- a series of recommendations and options available to the district to meet current and projected facility needs; and

- a 10-year enrollment forecast by grade and by campus for the entire district.

Brownfield ISD engaged in several of these activities leading up to the approval of its $40.0 million facilities bond in May 2019. The district contracted for a condition assessment of the middle school in October 2018. Additionally, staff and the Citizens Bond Committee collectively discussed the broad use of facilities at each campus to determine the best use of each facility.

The district's facilities planning has focused on the approval and allotment bond funds. However, Brownfield ISD has not developed a process to continue long-term facilities planning beyond the completion of the bond project. When the review team requested a facilities master plan, the district provided a two-page document that was limited to the elements of the bond program.

One of the most important elements of long-term facilities planning is analyzing capacity rates accurately for all district facilities. Campus capacity is the total number of students that can occupy a campus safely while that campus meets educational standards for each student. Determining campus capacities enables school districts to prepare for incoming students by calculating campus utilization rates. Districts calculate these rates by dividing the number of students enrolled at each campus by the capacity of each campus. However, Brownfield ISD staff report that the district has not conducted any formal analysis of campus capacity for any district facilities.

Another key component of facilities planning is establishing a process for accurate student enrollment projections that forecast student enrollment at least five years into the future. These projections compare past districtwide projections with past actual enrollments to identify trends and forecast facility's needs. During onsite interviews, Brownfield ISD staff reported that the district has not conducted formal student enrollment projections since 2013.

Brownfield ISD also does not conduct regular audits and inspections of school facilities, and the district has not set any official short- or long-term goals for facilities beyond the completion of bond projects.

Without a comprehensive facilities master plan, a district is unable to ensure that it directs school district resources to the highest priorities. The lack of a facilities master plan may result in underutilized campuses and increased operating costs. Additionally, without a facilities master plan, a district cannot effectively schedule and budget funds to properly maintain and enhance its facilities.

The district's recent facility decisions outside of the bond program provide an example of the impact of Brownfield ISD's lack of facility master planning. During onsite interviews, Brownfield ISD staff said that the district planned to carry out the following actions:

- close Bright Beginnings Academic Center and relocate the student population to Colonial Heights Elementary School;

- move Colonial Heights Elementary students to Oak Grove Elementary School; and

- open an employee daycare in the Colonial Heights Elementary facility.

Staff said that the district would begin these projects during school year 2020–21 and complete them by the beginning of school year 2021–22.

Because the district does not have a facilities master planning process, the district made these decisions without the benefit of a formal capacity analysis, enrollment projections, or establishing long-term goals or objectives. As a result, the district has not addressed several crucial issues surrounding these decisions. These issues include determining the changes and improvements needed to transition Colonial Heights Elementary to a daycare facility, particularly whether its spaces and amenities are suited to the academic and social and emotional early childhood needs of Bright Beginnings students. In addition, the 2013 facilities condition assessment recommended addressing the following issues at the Oak Grove Elementary facility:

- large group spaces that do not support the student population adequately, including the library and cafeteria;

- additional computer and sensory lab space needs;

- a single gymnasium and activities room that is small for the 2013 student population; and

- inadequate or unavailable support spaces, including kitchen dining space, school offices, clinic, and counselor's space.

The district shows no evidence that it has addressed these issues. If these problems existed at Oak Grove Elementary for its student population during 2013, it is unclear whether its facilities can accommodate the influx of students from Colonial Heights Elementary.

FIGURE 5–4
SAMPLE LONG-RANGE FACILITY MASTER PLAN ELEMENTS
CALENDAR YEAR 2003

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

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

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

- providing a baseline element for decision making across the district;

- ensuring that current and long-range educational programming needs are and will be met;

- providing a conduit for input from all stakeholders, including the community, parents, students, and staff;

- ensuring that the district's requirements and goals are communicated clearly; and

- providing the starting point for the development of bond proposals needed to support facility improvements and accomplish educational initiatives.

A 2016 report from the *Journal of Facility Management* titled "Heightened Change Awareness and Responsiveness Through Continuous Facility Master Planning" emphasizes the importance of a facilities master plan in providing guidance from the existing physical plant to educational environments that align with the district's mission. The facilities master plan coordinates and aligns many diverse considerations into a strategic long-term vision for facilities.

The Texas Education Agency (TEA) provides districts with a recommended planning model for facilities. **Figure 5–4** shows TEA's recommended program elements for districts to

develop a well-documented and comprehensive master planning approach to facilities.

Brownfield ISD should establish a five-year facilities master plan and update the plan annually.

The superintendent should designate and establish a facilities master planning team chaired by the director of maintenance and transportation. Team members should include the food services director, the business manager, and selected principals, teachers, custodial staff, and community representatives.

The team should adopt a formal facility master-planning process to develop and implement the plan, beginning with an assessment of the district's current and future facility needs. To accomplish this needs assessment the district should carry out the following steps:

- conduct a facility capacity assessment to establish 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, gyms, 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; and

- analyze student enrollment to establish accurate enrollment projections of at least five years.

After completing the needs assessment, the team should analyze all the available data and develop a five-year facilities master plan that includes a listing of 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 district should submit the master facilities plan to the board and superintendent for review and approval and update the plan annually to ensure that it continually assesses its facility needs.

The district could implement this recommendation with existing resources.

DEFERRED MAINTENANCE (REC. 29)

Brownfield ISD does not have a process to determine the extent of its facilities' deferred maintenance needs and corresponding potential costs.

Deferred maintenance is the practice of postponing needed maintenance activities such as repairs on both real property (i.e., infrastructure) and personal property (e.g., machinery). Deferring maintenance can save an organization costs in the short term; however, the long-term effects of deferred maintenance can be costly. Deferring maintenance can lead to facilities and equipment deteriorating prematurely and needing repairs that are more expensive and time-consuming than otherwise would have been necessary. In addition to higher costs, the results can range from simple poor building aesthetics to the forced renovation or demolition of an entire structure.

During onsite interviews, Brownfield ISD staff acknowledged that the district cannot determine its deferred maintenance needs because it does not track deferred maintenance. Brownfield ISD has not conducted a facilities condition assessment of all district facilities since calendar year 2013. A facilities condition assessment is a periodic procedure conducted typically by architects or engineers to determine the condition of all elements of a building. Its purpose is to identify, in detail, deferred maintenance in building components that a district should be maintaining, repairing, or replacing, and any other needed maintenance actions. The only condition assessment the district has conducted during the past seven years was an assessment of Brownfield Middle School during 2018 that served as the basis for the $40.0 million bond package approved in May 2019.

Another obstacle to the effective tracking of deferred maintenance is that the district does not analyze data from its work order system. The district manages its daily maintenance operations through work order requests that Brownfield ISD staff enter into an online work order system. Maintenance Department staff issue printed work orders generated through the system to maintenance staff, who close the work orders after performing the requested maintenance. The district does not analyze work order data for trends or patterns.

Effective districts use work order systems to track recurring problems with a facility or in a piece of equipment. Work orders also can provide a written record of parts needed for the job, work completed each day, the number of hours taken to complete tasks, and the cost of equipment and facility repairs or replacement. In this way, more detailed work order systems provide information for equipment needs and determining the cost of deferred maintenance. Brownfield ISD does not use its work order system to accomplish these tasks.

In addition to the lack of a recent facilities condition assessment or analysis generated by the district's work order system, two indicators suggest that Brownfield ISD may have excessive deferred maintenance.

First, the district lacks an effective preventive maintenance program. Preventive maintenance is maintenance that is performed regularly on a piece of equipment to lessen the likelihood of it failing. Districts perform this maintenance while the equipment is still working to eliminate unexpected breakdowns. Staff can schedule preventive maintenance based on a time-based or usage-based trigger. A typical example of a time-based preventive maintenance trigger is a regular inspection on a critical piece of equipment. Staff may schedule usage-based preventive maintenance when a piece of equipment reaches a certain number of hours in use or production cycles.

During onsite interviews, Brownfield ISD staff reported that the district has no preventive maintenance schedule. According to staff, the majority of the maintenance performed in the district is of a reactive nature. When equipment malfunctions or breaks, staff repair or replace it as quickly as possible. Staff acknowledged the need for preventive maintenance but said that a lack of funding contributed to the district's inability to implement an effective preventive maintenance program.

During onsite observations, the review team found several examples of visible maintenance neglect in the form of stained ceiling tiles from unrepaired condensate, plumbing and roof leaks, and deteriorating window frames and caulking. Additionally, mechanical, electrical, and plumbing systems are in poor condition and require replacement at two campuses and major overhaul in the remaining school facilities. The prolonged lack of preventive maintenance has hastened the deterioration of these building systems.

The second indicator that Brownfield ISD may have excessive deferred maintenance appears in the results from the 2013 facilities condition assessment. The report summarized the condition of all but one of the campuses as needing complete renovation or replacement. For example, the report recommended the abandonment of Brownfield Middle School and found that only Oak Grove Elementary School was appropriate for its current use, following minor repairs. The 2013 report provided a ratings systems that determined the quality of the campuses and other facilities, but it included no monetary values for deferred maintenance.

It is likely that the district's deferred maintenance has increased since the 2013 assessment, because the district has not addressed any major issues presented in the assessment at the time of the review team's onsite visit. This likelihood is supported further by Brownfield ISD's low spending on maintenance.

From school years 2016–17 to 2018–19, Brownfield ISD spent an average of $2,064,826 annually on maintenance expenses, including all custodial costs. The district estimates that the total current replacement value (CRV) of all district facilities is $80,581,795. This value means that the district spent, on average, a little more than 2.5 percent of CRV on maintenance and repair during the past three school years. Without custodial costs, the annual maintenance expense for these three school years is $1,105,617, or 1.37 percent of CRV.

The Building Research Board advises on technology and science issues related to the planning, design, production, and management of buildings, public facilities, and other physical infrastructure. Its 1990 report, *Committing to the Cost of Ownership: Maintenance and Repair of Public Buildings*, established an industry standard for maintenance and repair spending for facilities that remains in wide use. According to the report:

> An appropriate budget allocation for routine M&R [maintenance and repair] for a substantial inventory of facilities will typically be in the range of two {percent} to

four percent of the aggregate current replacement value of those facilities (excluding land and major associated infrastructure). In the absence of specific information upon which to base the M&R budget, this funding level should be used as an absolute minimum value. Where neglect of maintenance has caused a backlog of needed repairs to accumulate, spending must exceed this minimum level until the backlog has been eliminated.

Neglect of maintenance at Brownfield ISD has caused a backlog of repairs, and the amount the district is spending on maintenance and repair is much less than industry standards.

The district's lack of a current facilities condition assessment, effective work order system, and preventive maintenance practices, and low spending for maintenance all have contributed to potential deferred maintenance issues. Not addressing deferred maintenance can affect districts negatively in the following ways:

- extensive, long-term costs;
- reduced equipment efficiency;
- entire system failure;
- safety and health risk to occupants;
- possibility of fines from regulatory agencies;
- shorter life cycles for equipment and facilities; and
- increased downtime for equipment and facilities, which negatively affects the district's ability to educate students.

The $40.0 million bond package enables the district to address some of the issues found in the 2013 condition assessment. However, it contains no funds to remedy any deferred maintenance, other than the retirement of deferred maintenance through demolition. If the district continues to forgo deferred maintenance tracking, the new buildings and renovations planned in the bond could deteriorate more quickly because they will not be maintained and serviced regularly.

Best practices in addressing deferred maintenance consist of conducting a building condition assessment, establishing a system to track deferred maintenance, and implementing a preventive maintenance program.

The *Journal of Infrastructure Reporting and Asset Management*'s 2011 report, "Building Condition Assessment Metrics: Best Practices," states that "an objective and repeatable inspection process is essential to an accurate and credible condition

assessment measure." *State of Practice for Facility Condition Assessment*, published in 2016, states that facility condition assessments are integral to buildings' overall performance. In the National Research Council's 1990 report *Committing to the Total Cost of Ownership: Maintenance and Repair of Public Buildings*, the authors say that periodic condition assessments are an essential step toward effective facilities management.

The Florida Office of Program Policy Analysis and Government Accountability states that "implementing a preventative maintenance program to reduce long-term maintenance costs and service outages" is a best practice for preventive maintenance of public facilities. In Texas, Manor ISD has established a preventive maintenance program that has increased the projected useful life of district facilities and equipment. Supervision of the program is well-organized and sets high expectations for all district staff. A component of Manor ISD's preventive maintenance program begins with teachers, who are encouraged to be observant and proactive in identifying building and playground issues related to maintenance. Each spring, principals are required to obtain written input from teachers to develop a list of instructional facility repairs, alterations, or improvements that will make facilities more attractive, safer, or more useful. The district administration attempts to complete as many of these requests as reasonably possible to reinforce teachers' participation in the process.

Figure 5–5 shows a sample preventive maintenance schedule that Brownfield ISD can use as a template.

Brownfield ISD should contract for a comprehensive facilities condition assessment, and develop and implement a preventive maintenance program.

Using its established procedures and processes to procure professional consulting services, the district should issue a request for qualifications (RFQ) from potential contractors for a comprehensive facilities condition assessment of the district's facilities inventory. Brownfield ISD's RFQ should require that the assessment includes an evaluation of the cost of deferred maintenance. The district should budget for a firm to conduct a facilities condition assessment every five years.

After receiving the results of the initial facilities condition assessment, the director of maintenance and transportation should prioritize the tasks that the district should perform to remedy the identified deferred maintenance. After two successive five-year condition assessments showing an acceptably low level of deferred maintenance, the district may opt to schedule an update 10 years later.

Before the district completes any of the bond projects, the director of maintenance and transportation should implement a districtwide preventive maintenance program to lengthen the expected life span of all newly constructed or renovated district facilities. The director of maintenance and transportation should assemble a complete inventory of all equipment and building systems, a five-year history of failures, and the related repair costs. The director then should develop and implement a detailed preventive maintenance schedule for all district maintenance projects and prioritize these projects by building and equipment. The preventive maintenance schedule should incorporate routine inspections and scheduled maintenance, and should track the associated maintenance costs. The district can use the preventive maintenance schedule shown in **Figure 5–5** as a template.

As part of its preventive maintenance program, Brownfield ISD should optimize the use of its work order system to plan preventive maintenance effectively and assess the overall efficiency of the Maintenance and Transportation Department. Staff should use the work order system to track equipment repairs, the time it takes to repair equipment, and repair costs. Additionally, the director of maintenance and transportation should use the reports available through the work order system to evaluate the district's existing and future facility needs. The district should use these reports to determine the preventive maintenance tasks necessary for typical facilities equipment and systems and the frequency with which the maintenance should occur. Any preventive maintenance plan should include an annual assessment of the cost of the district's deferred maintenance.

After the district has evaluated the condition assessment and developed a preventive maintenance plan, the director of maintenance and transportation, representatives from the Business Office, and the superintendent should establish a budget for maintenance and repair. It is likely that the district will need to spend more than the $1.5 million it has averaged during the past three school years. The district should expect maintenance and repair spending to exceed 4.0 percent of CRV.

The fiscal impact assumes that the comprehensive facilities condition assessment will cost approximately $40,000 ($10,000 x four campuses based on average condition assessment rates). The fiscal impact of needed maintenance and repair cannot be determined until the facilities condition assessment occurs and the district completes the bond projects.

FIGURE 5–5
SAMPLE FACILITIES PREVENTIVE MAINTENANCE SCHEDULE
DECEMBER 2019

PREVENTIVE MAINTENANCE ACTIVITY	ACTIVITY FREQUENCY
Clean air-conditioning unit filters	Every 2 months
Change air-conditioning unit filters	Intervals of 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 capacity test chillers	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 – 20-year roof warranty
Inspect exterior lighting	Every 6 months
Inspect elementary play gym lighting	Annually
Inspect and clean gym gas heaters	Annually
Inspect playground equipment	Monthly, repair as needed
Clean fire alarm system smoke detectors	Semiannually
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 – 8-year replacement
Stripe exterior parking lots	Annually
Check condition of asphalt parking lots	Annually – 12-year replacement
Check carpet	15-year replacement
Check vinyl composition tile floors	20-year replacement
Spray wash exterior soffits and building	Every 2 years or as needed
Replace glass and Plexiglas	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, December 2019.

ENERGY MANAGEMENT (REC. 30)

Brownfield ISD lacks a formal process to manage, measure, and monitor its energy use.

During onsite interviews, Brownfield ISD maintenance staff said that they are working to improve energy usage in the district. The district has installed heating and air energy management systems at several facilities and requires staff to replace light bulbs with energy-efficient models. Staff also said they are investigating purchasing energy-efficient shades for windows at the administrative building.

However, the review team observed several issues with energy management throughout the district.

For example, the heating and cooling plants at Colonial Heights Elementary School, Oak Grove Elementary School, and the current Brownfield High School likely have reached or exceeded their respective life spans. Colonial Heights Elementary is 67 years old, and Oak Grove Elementary and the high school each are more than 50 years old. A heating, ventilation, and air-conditioning (HVAC) system replacement or major overhaul improves efficiency and

provides a more balanced heating and cooling environment. Additionally, Colonial Heights Elementary School, Oak Grove Elementary School, and the current Brownfield High School have single-pane windows that predate energy-efficient design. At Colonial Heights Elementary, the frames and caulk are separating on several windows. In addition, district staff said they are replacing existing light bulbs with more energy efficient ones; however, the lighting systems in most district facilities use older, less-efficient methods.

Texas school districts are required to develop energy management strategies to reduce their overall energy consumption. The Texas Education Code, Section 44.902(a), requires each district to establish a long-range energy plan to decrease and maintain its annual electric consumption by 5.0 percent. Brownfield ISD's Board Policy CL (LEGAL) includes these requirements. However, despite the requirements in statute and board policy, the district has not developed an energy management plan.

Brownfield ISD pays City of Brownfield Utilities a monthly invoice for electricity, water, sewer, and garbage. The district did not provide invoices for other utilities to the review team. During school year 2017–18, the total cost of electricity for Brownfield ISD was approximately $332,566, and its total kilowatt-hour (kWh) consumption was 3,010,287. The kWh is an industry standard that measures electricity usage. It is the amount of energy used to keep a 1,000-watt appliance operating for one hour.

As shown in **Figure 5–3**, the total floor area of Brownfield ISD's facilities is 562,967 square feet. After subtracting the areas of athletic fields, transportation barns, warehouses, storage sheds, and livestock barns from the total listed floor area, the review team estimates that 282,000 square feet of the district's floor area requiring heating and cooling.

The Council of Great City Schools (CGCS), a coalition of 76 school districts nationwide dedicated to improving education for children, identified key performance indicators in several operational areas within a school district. In the area of energy management, the council identified the following indicators:

- utility costs per square foot;

- electricity usage per square foot; and

- heating fuel usage per square foot.

Figure 5–6 shows how Brownfield ISD's energy management data compare to those of CGCS member districts for utility

costs and electricity usage. The data does not show a comparison of heating fuel usage because Brownfield ISD did not provide the review team with this information. The CGCS uses a quartile system to assess data.

Brownfield ISD's total utility cost per square foot is within the lower quartile of CGCS data due to low electricity costs, but the district's electricity usage per square foot is within the upper quartile due to energy-inefficient buildings and mechanical systems.

An effective energy management plan includes strategies for using the minimum amount of energy while continuing to provide a desired level of comfort to building occupants. These strategies should include the education of building staff, enhancements to or automation of building controls, proper maintenance of existing equipment, and installation of energy-efficient equipment as the district replaces systems.

In addition to this basic mandate, best practices dictate that an energy plan includes the following elements:

- strategies for achieving energy efficiency that result in net savings for the district, or that could be achieved without financial cost to the district; and

- the initial, short-term capital costs and lifetime costs and savings that could result from implementation of each strategy.

The State Energy Conservation Office (SECO) provides free support to schools in the following areas:

- energy accounting;

- energy-efficient facility operation and maintenance;

- indoor air quality;

- water conservation; and

- comprehensive energy planning.

SECO also can provide a Preliminary Energy Assessment to the district at no cost. The Preliminary Energy Assessment includes the following elements:

- analysis of utility bills and other building information to determine energy and cost utilization indices of facilities;

- recommended maintenance procedures and capital energy retrofits;

- design and monitoring of customized procedures to control the run times of energy-using systems;

FIGURE 5–6
ENERGY MANAGEMENT KEY PERFORMANCE INDICATORS FROM COUNCIL OF GREAT CITY SCHOOLS COMPARED TO BROWNFIELD ISD
FISCAL YEAR 2018 (1)

INDICATOR	LOWER QUARTILE (2)	MEDIAN	UPPER QUARTILE	BROWNFIELD ISD
Utility Cost per Square Foot	$1.14	$1.34	$1.59	**$1.18**
Electricity Usage per Square Foot (kWh)	7.1	9.5	11.8	**10.67**

NOTES:
(1)   The indicators from the Council of Great City Schools (CGCS) are based on data collected from member districts during calendar year 2018. This data is compared to Brownfield ISD's school year 2018–19 data. This data is the most recent available from both sources.
(2)   The quartiles are reasonable benchmarks (upper, median, and lower) for measuring performance. CGCS places data into four quartiles with the lower quartile number being the desired value for which the district should aim and the upper quartile number being a value that represents a need for improvement.

SOURCES: Council of Great City Schools, *Managing for Results in America's Great City Schools*, October 2019; Brownfield ISD, October 2019.

- informal onsite training for building operators and maintenance staff;

- follow-up visits to assist with the implementation of the recommendations and to determine savings associated with the project;

- development of an overall energy management policy;

- assistance with the development of guidelines for efficiency levels of future equipment purchases; and

- facility benchmarking using Energy Star Portfolio Manager.

Brownfield ISD should develop and implement an energy management plan to conserve energy and reduce energy costs in compliance with state law and board policy.

The director of maintenance and transportation should develop an energy management plan that includes a mission statement and specific energy conservation and building management guidelines. These guidelines should include policies for appropriately regulating classroom temperatures and communication and enforcement strategies. The energy management plan also should include the following components:

- evaluating installed controls to ensure that systems are functioning correctly, which includes checking independent motion detectors for controlling lights and HVAC systems, checking night and weekend set-back controls, and performing preventive maintenance, such as fixing leaks to reduce water consumption;

- performing energy surveys to identify solutions for systems or operational practices that are wasting energy;

- adopting policies for closing windows and doors and for controlling exhaust fans to reduce the cost of heating and cooling;

- establishing a schedule for regular cleaning, maintenance, and filter changes of HVAC equipment to protect indoor air quality and extend the equipment life;

- adopting standards for routine maintenance that require the use of energy-efficient equipment; for example, using high-efficiency light-emitting diode (LED) technology for all relamping and fixture replacements; and

- developing an incremental plan to increase staff awareness; for example, encouraging district staff to place equipment with high-energy use, such as coffee pots and refrigerators, in common rooms instead of keeping personal equipment in classrooms and offices.

Brownfield ISD should train district staff in energy-efficient behaviors. The director of maintenance and transportation should conduct an audit of the facilities to identify energy waste. Examples of wasteful practices include the installation of non-LED light bulbs, the presence of loose seals around windows, and doors left open unnecessarily.

Brownfield ISD should request a preliminary energy assessment from SECO and work further with the agency to determine other workable energy management services that it can provide the district.

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 to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team identified a fiscal impact for the following recommendation.

	RECOMMENDATION	2020–21	2021–22	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
5. FACILITIES USE AND MANAGEMENT								
29.	Contract for a comprehensive facilities condition assessment, and develop and implement a preventive maintenance program.	$0	$0	$0	$0	$0	$0	($40,000)
Total		**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**($40,000)**

6. FOOD SERVICES MANAGEMENT

Brownfield Independent School District (ISD) offers free breakfast and lunch to all district students. During school year 2018–19, Brownfield ISD had 1,725 students enrolled in prekindergarten through grade 12. The district has a cafeteria at each of its five campuses. During school year 2018–19, the Brownfield ISD Food Services Department had $1,452,903 in revenue and $1,141,018 in expenditures, with a fund balance of $311,885. The Brownfield ISD Food Services Department has 20.5 full-time-equivalent staff positions.

FINDINGS

♦ Brownfield ISD lacks a process to evaluate the Food Services Department's financial status regularly and to ensure that the program is operating efficiently.

♦ Brownfield ISD does not have a formal process guiding the operational decisions of the Food Services Department.

♦ Brownfield ISD does not administer its Child Nutrition Program effectively.

♦ Brownfield ISD's Food Services Department uses an inefficient staffing model for meal production and service.

♦ Brownfield ISD's kitchen facilities and equipment lack consistent maintenance.

♦ Brownfield ISD's Food Services Department does not budget or manage effectively the foods donated by the U.S. Department of Agriculture.

RECOMMENDATIONS

♦ **Recommendation 31: Designate the food services director to oversee the financial monitoring of the Food Services Department, and utilize sound financial reports to enhance financial monitoring of operations and promote financial stability in the Child Nutrition Program.**

♦ **Recommendation 32: Develop and implement a strategic plan for the Food Services Department.**

♦ **Recommendation 33: Establish and implement a food services operations manual.**

♦ **Recommendation 34: Develop and implement a staffing formula based on industry standards and individual operational needs for the Food Services Department and establish a substitute pool to cover staff absences.**

♦ **Recommendation 35: Formulate and implement a preventive maintenance and replacement program for all food services equipment and facilities.**

♦ **Recommendation 36: Develop and implement written procedures to manage and monitor foods donated by the U.S. Department of Agriculture.**

BACKGROUND

An independent school district's food services 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 benefit categories: free, reduced-price, and paid. Texas law requires school districts to participate in the breakfast program if at least 10.0 percent of their students are eligible to receive free or reduced-price meals. The 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 services operation also may offer catering services to supplement the food services budget or provide training for students interested in pursuing careers in the food service industry.

The food services operation is dependent on the organizational structure of the district. The two primary models of organizing food services operations are self-management and contracted management. Using the self-management model, a district operates its food services department without assistance from an outside entity. Using a contracted management model, a district contracts with a food service

FIGURE 6–1
BROWNFIELD ISD FOOD SERVICES DEPARTMENT
SCHOOL YEAR 2019–20
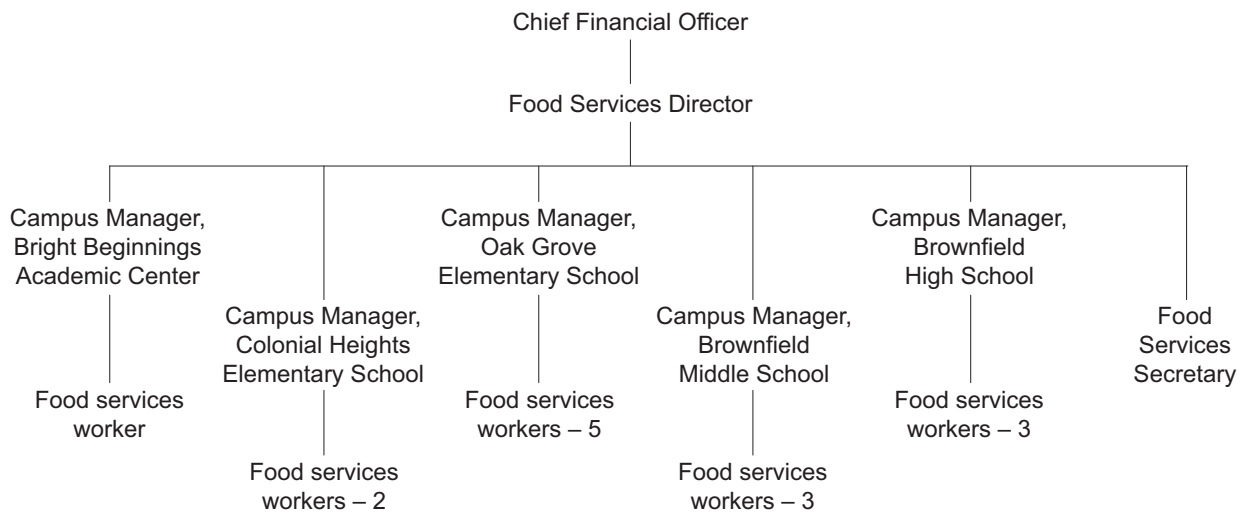
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

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.

Brownfield 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 Distribution Program. During school year 2016–17, the district began offering free breakfast and lunch to all students at all campuses through the federal Community Eligibility Provision (CEP), a nonpricing meal service option for campuses and school districts located in low-income areas. CEP enables the highest-poverty campuses and districts to serve breakfast and lunch at no cost to all enrolled students without collecting household applications. USDA reimburses campuses that adopt CEP using a formula based on the percentage of students that categorically are eligible for free meals based on their participation in other specific means-tested programs.

Brownfield ISD has a cafeteria at each of its five campuses: Bright Beginnings Academic Center, Colonial Heights Elementary School, Oak Grove Elementary School, Brownfield Middle School, and Brownfield High School. The district serves breakfast in the classroom at Colonial Heights and Oak Grove elementary schools. Bright Beginnings Academic Center,

Brownfield Middle School, and Brownfield High School serve breakfast in their cafeterias.

Brownfield ISD's Food Services Department has 21 staff, including a food services director, five campus managers, 14 food services workers, and one part-time secretary. The secretary handles purchase orders, inputs deposits into the district's financial management system, and assists the food services director as needed.

Figure 6–1 shows the district's reporting structure for the Food Services Department. The food services director oversees the department and reports to the district's chief financial officer (CFO) in the Business Office. The Legislative Budget Board's School Performance Review Team (review team) visited the district in December 2019. During onsite interviews, Brownfield ISD staff reported that the CFO would be leaving the district's employment at the beginning of calendar year 2020 and would be replaced with a business manager. This chapter refers to the CFO when discussing district processes that occurred at the time of and prior to the review team's onsite visit. When discussing future recommendations the chapter refers to the business manager.

The food services director ensures compliance with federal, state, and program requirements and the CFO develops and administers the food services budget. All campus managers and food services workers work 40.0 hours per week and follow 6:30 AM to 3:00 PM schedules.

The food services director annually evaluates the five campus managers and the food services secretary, and the campus managers annually evaluate their respective food services workers. All food preparation takes place onsite. The district uses Nutrikids, a point-of-sale software for counting and claiming reimbursable meals. District custodial staff clean the floors in the dining rooms, but food services staff clean the tables and remove the trash. Brownfield High School maintains an open campus policy that authorizes juniors and seniors to eat lunch off campus. The district's other students must remain on campus for mealtimes.

During November 2019, the average daily participation (ADP) in the NSLP was 85.1 percent of enrolled students, and the ADP in the SBP was 78.4 percent.

DETAILED FINDINGS

PROGRAM MONITORING (REC. 31)

Brownfield ISD lacks a process to evaluate the Food Services Department's financial status regularly and to ensure that the program is operating efficiently.

Use of sound financial management concepts and principles in the operation of CNPs is critical to ensure that the program meets the nutritional standards, accountability requirements, and the identified financial program goals of the district. The ability to interpret and analyze the financial outcomes of operational decisions is essential to effective management of CNPs.

Financial monitoring of CNPs is important because these programs have both revenue and expenditure accounts. If revenue does not cover expenditures, the district must use its general funds to subsidize the CNP. Regular financial monitoring helps to ensure that the program is solvent fiscally and provides information for decision making.

Brownfield ISD does not oversee the Food Services Department's financial operations effectively. The department operates without the benefit of financial tools such as monthly financial statements, precost and post-cost menu analyses, and calculations of cost per meal served.

Without the use of these financial tools, the district cannot perform the following tasks effectively:

- highlight areas of strength or identify areas for improvement;

- identify financial trends and take appropriate steps to address these trends in a timely manner;

- monitor and track key operating and financial measures such as net profit or loss, student participation, meals per labor hour, food costs, and wages;

- hold campus staff accountable for operations; and

- determine if the district's method of management is efficient and cost effective.

Staff reported confusion regarding who is responsible for generating financial statements for the Food Services Department and monitoring its financial operations. The district uses Skyward as its enterprise resource planning (ERP) system to conduct all of its financial accounting, payroll, and procurement functions, and to produce detailed financial reports. The Food Services Department also uses the Nutrikids point-of-sale (POS) system to record lunch and breakfast transactions in district cafeterias. This system also has the ability to generate financial reports for the CNP.

However, staff said that the department does not access financial reports from the district's ERP or POS systems consistently. During onsite interviews, the CFO said that the food services director was responsible for overseeing the daily financial operations of the department; however, the food services director reported not having access to the district's ERP to generate financial reports. As a result, neither the Business Office nor the Food Services Department consistently monitors the monthly revenue and expenditure for food services, either at the department level or by cafeteria.

The food services director said that the only financial updates she receives are occasional informal discussions with the CFO regarding whether the department is projecting a net profit or net loss. The food services director said she receives no financial reports. Campus managers reported that they are not aware of the financial status of their operations because they do not receive monthly financial reports or regular updates on how efficiently their cafeterias are performing. This lack of financial monitoring makes it difficult for the district to determine whether the department or the individual cafeterias are financially sound or in need of improvements. The food services director makes decisions regarding menus, costs of food and supply items, salaries, and assigning labor hours with no data analysis of how these costs affect the program's financial health. For example, each cafeteria inventories food, but it does not price the items to adjust monthly or annual financial statements.

The lack of detailed financial reports and monitoring leaves the district unable to analyze the overall finances of the Food

Services Department effectively. **Figure 6–2** shows the budgeted and actual totals for the Brownfield ISD Food Services Department from school years 2016–17 to 2018–19.

As shown in **Figure 6–2**, the Brownfield ISD Food Services Department totals changed from a net loss of $47,532 during school year 2016–17 to net profits of $248,657 during school year 2017–18 and $311,885 during school year 2018–19. This change is a significant shift in financial outcomes, because the actual revenues exceeded the budgeted expenditures. Neither the Business Office nor the Food Services Department investigated this turnaround in financial performance, and neither the food services director nor the CFO could explain it fully during onsite interviews.

According to staff, the district hired a consultant to evaluate the Food Services Department during school year 2016–17 to determine why the department's expenditures were exceeding its revenue. The consultant made several recommendations to improve departmental efficiency, and staff reported that the district followed these recommendations, which include shifting from a six-week menu to a four-week menu and reducing food costs. Staff also expressed the belief that enrolling in the CEP to make all meals free for students increased revenue. However, even after implementing the consultant's recommended changes beginning during school year 2017–18, the district budgeted for a greater net loss than during school year 2016–17. After earning a $248,657 profit during school year 2017–18, the district budgeted for the department to break even during school year 2018–19. Failure to anticipate the profits for either school year indicates that the district is not monitoring Food Services Department finances effectively.

The district's lack of financial monitoring of the Food Services Department also has placed it at risk for noncompliance with state and federal requirements. As shown in **Figure 6–2**, the Food Services Department made a $248,657 profit during school year 2017–18. The district transferred these funds from the Food Services Department into the district's general fund. During onsite interviews, Brownfield ISD staff said that the district transferred the funds to repay for previous years during which the Food Services Department had operated at a loss and required supplemental funds from the general fund. According to the TDA's *Administrator's Reference Manual*, Section 14.66, although a district can provide a loan to a CNP, the CNP must repay the loan within the fiscal year the loan was made. The district may not transfer funds from a CNP account to a district fund to cover CNP deficits from previous years. This practice constitutes a

FIGURE 6–2
BROWNFIELD ISD FOOD SERVICES DEPARTMENT BUDGETED AND ACTUAL TOTALS
SCHOOL YEARS 2016–17 TO 2018–19

CATEGORY	2016–17	2017–18	2018–19
Budgeted Revenue	$1,400,000	$1,225,000	$1,193,500
Budgeted Expenditures	$1,500,000	$1,419,943	$1,193,500
Budgeted Total	**($100,000)**	**($194,943)**	**$0**
Actual Revenue	$1,357,240	$1,447,313	$1,452,903
Actual Expenditures	$1,404,772	$1,198,656	$1,141,018
Actual Total	**($47,532)**	**$248,657**	**$311,885**

SOURCE: Brownfield ISD, school years 2016–17 to 2018–19.

misuse of child nutrition funds, which may result in a TDA corrective action. Failure to address a corrective action may result in withholding or terminating CNP funding.

Although it is commendable that the department changed its financial outcomes from an annual net loss to a profit, the district's lack of financial monitoring tools resulted in Brownfield ISD staff being uncertain regarding which factors were increasing profits for the Food Services Department. Additionally, the district's lack of financial monitoring could result in it being unprepared to adapt to issues that affect Food Services Department finances negatively.

Standard business practice dictates the development of a well-defined set of reports that districts can use for data analysis and program improvement. The 2008 book *Managing Child Nutrition Programs: Leadership for Excellence* states that one of the most important aspects of financial management involves the preparation of financial statements to analyze program operations.

Figure 6–3 shows the reports used by effective districts for financially monitoring CNPs.

The Institute of Child Nutrition (ICN), part of the School of Applied Sciences at The University of Mississippi, provides training and technical assistance for child nutrition programs. The ICN has a financial management training that is available to food services directors and food services department staff.

Brownfield ISD should designate the food services director to oversee the financial monitoring of the Food Services Department, and utilize sound financial reports to enhance

FIGURE 6–3
FINANCIAL REPORTS FOR MONITORING BROWNFIELD ISD'S FOOD SERVICES OPERATIONS, DECEMBER 2019

REPORT	USES	FREQUENCY	SOURCE
Budget	Forecasts for the next year by using historical, economic, and demographic data; projected enrollment; menu changes; and changes in operational procedures. Enables informed financial decisions. Enables a forecast of financial performance for the next year. Provides data for comparisons of actual and forecasted performance.	Annual, with monthly monitoring	Food Services Department collaborates with the Business Office
Menu costing	Enables informed decision making for purchases and the continuation of products' costs.	Daily	Food Services Department
Daily revenue received from lunch and breakfast	Enables the identification of major sources of revenue such as daily deposits, free, reduced-price, paid reimbursements, a la carte, catering, or other.	Daily	Food Services Department point-of-sale system and Business Office
Balance sheet	Enables a comparison of current balances with balances at the end of the month of the previous year.	Monthly	Business Office
Profit and loss statement	Enables identification and analysis of increases or decreases in participation or expenses. Enables identification of campuses making a profit or experiencing a loss. Enables administrators to determine where key issues exist.	Monthly	Food Services Department
Key operating percentages	Enables management and staff to measure expenses, including: • food cost percentage; • labor cost percentage; • other cost percentage; • break-even point; • inventory turnover; • meal participation rates; • average daily labor costs; and • average hourly labor costs	Monthly or annually	Food Services Department point-of-sale system and Business Office

SOURCE: Legislative Budget Board School Performance Review Team, December 2019.

financial monitoring of operations and promote financial stability in the CNP.

As soon as practicable, the food services director should attend training in financial management for CNPs. The district should look into the training available through the ICN. Upon completion of the training, the business manager should coordinate with the food services director to implement budget and financial control systems for the Food Services Department. The Business Office staff should train the food services director and the food services secretary in the use of Skyward, including how to generate and produce financial reports from the system. The food services director and Business Office should configure the financial reports to monitor food services operations. Campus managers also should receive financial reports regularly to update them on the status of their cafeterias. The food services director should use the financial reports to hold campus managers responsible for the efficiency of their cafeterias. Brownfield ISD should use all of these reports with the frequency shown in **Figure 6–3**.

The food services director should meet at the beginning of every school year with the supervisor in the Business Office (i.e., business manager or CFO) to identify the annual

financial and operational goals for the Food Services Department. The food services director should meet quarterly with the supervisor to provide information regarding the status of these goals. Finally, the supervisor in the Business Office should evaluate the food services director annually at the end of the school year on how effectively the director met these yearly goals.

The district could implement this recommendation with existing resources.

STRATEGIC PLANNING (REC. 32)

Brownfield ISD does not have a formal process guiding the operational decisions of the Food Services Department.

Effective food services departments manage multiple operational elements, such as accurate accounting and reporting, effective marketing, menu planning, inventory management, establishing efficient production and tracking methods, public relations, facilities maintenance, and implementing correct sanitation procedures.

Effective districts engage in a strategic planning process to manage all the elements that maintains and sustains their CNPs. Strategic planning is a management tool that helps an organization focus its efforts toward common objectives, ensure that members of the organization work toward the same goals, and assess and adjust the organization's direction in response to changes. Strategic planning provides the foundation for a structured effort to produce decisions and actions that shape and guide the mission and work of an organization. Developing a strategic plan for food services operations enables districts to manage the programs' operational elements more effectively.

Brownfield ISD lacks a strategic plan for the Food Services Department and long-term or short-term department goals. During onsite interviews, staff reported that the Food Services Department makes decisions based on daily operational needs and the availability of funds without a long-term analysis of the effects of those decisions.

For example, meal participation rates are a measurable statistic that indicates how well a district's food services operations are attracting students to participate in the CNP. Successful districts closely monitor meal participation rates by campus to assist in evaluating the success of their CNPs and in setting goals for annual or quarterly meal participation rates. Brownfield ISD staff said that the district does not set meal participation goals, nor are meal participation rates monitored closely or used as part of the food services

FIGURE 6–4
BROWNFIELD ISD MEAL PARTICIPATION RATES FOR ALL CAMPUSES
SCHOOL YEARS 2016–17 TO 2019–20

YEAR	MEAL	RATE
2016–17	Breakfast	96.2%
	Lunch	86.6%
2017–18	Breakfast	83.8%
	Lunch	84.4%
2018–19	Breakfast	81.7%
	Lunch	86.0%
2019–20 (1)	Breakfast	79.0%
	Lunch	87.0%

NOTE: School year 2019–20 data was available through the end of November 2019.
SOURCE: Texas Department of Agriculture, District Profile – Brownfield ISD, school years 2016–17 to 2019–20.

director's and cafeteria managers' evaluations. **Figure 6–4** shows Brownfield ISD's meal participation rates for all campuses from school years 2016–17 to 2019–20 as of November 2019.

As shown in **Figure 6–4**, breakfast participation rates have decreased by approximately 17.0 percent during the past four school years, even though breakfast became free for all students during school year 2016–17. The lack of long-term or short-term goal setting or monitoring of meal participation rates inhibits the district's effectiveness in assessing whether this trend indicates issues with the way the Food Services Department operates breakfast service. District staff said that the decrease may have resulted from the middle school and high school no longer serving breakfast in the classroom. However, the district has not assessed or analyzed the situation, nor were staff aware of how much breakfast participation had decreased.

Another example of the district's lack of long-term planning is in the area of meal planning. Brownfield ISD operates on a four-week menu cycle, and menu items are selected from sample menus developed by Regional Education Service Center (ESC) XVII (Region 17). Menu planning is challenging, and unpopular menus can reduce meal participation. Decreased breakfast participation may have resulted from the lack of variety in the menu, use of unpopular food items, or the lack of student involvement in the menu-planning process. However, Brownfield ISD lacks a process to monitor or evaluate the popularity of menu items and adjust menus accordingly. The district does not conduct surveys of

students or staff nor formally monitor plate waste to determine if the frequency and variety of menu offerings is appropriate. Brownfield ISD's decision-making process for which items to include on menus is not guided by data or goals set by the district, but instead is based on the Region 17 sample menus.

Brownfield ISD's lack of a formal process for guiding operational decisions also is evident in how the department budget is developed. According to information gathered during onsite interviews, the district's CFO prepares the annual budget for the Food Services Department based on the previous year's budget adjusted for projected enrollment changes. The food services director is not included in the budget development and planning process nor any discussion of the Food Services Department's long-term or short-term goals or needs. The district's lack of long-term planning regarding budget development contributed to large differences between budgeted and actual revenues and expenditures beginning during school year 2016–17.

As a best practice, Brownsville ISD's Food Services Department developed a three-year strategic plan to assist in meeting departmental goals and objectives. Food services staff met for strategic planning sessions to identify the department's core purpose and develop a systematic guide to achieve that purpose. The department incorporated the district's goals into its strategic plan and considered the unique needs of the food services function. Campus managers contributed to setting the annual goals, and supervisors assessed the strategic effects of these goals. After soliciting input from its customer base and its staff, the department formulated a plan to correct areas within its control. The Brownsville ISD staff annually evaluates progress in meeting the strategic plan's mission statement and formulates an action plan for the next school year. The action plan contains seven goals and identifies each goal's objectives. The plan includes action steps to meet each goal and objective and requires a completion date to track progress toward each goal.

Brownfield ISD should develop and implement a strategic plan for the Food Services Department.

To facilitate this process, the food services director should coordinate with the Business Office to engage in a strategic planning process for the Food Services Department. The process should identify the department's approach to providing healthy and nutritious meals for students in an efficient and cost-effective manner. The plan should serve as a framework to guide short-term and long-term decision making and assist the district in managing the Food Services Department efficiently and effectively. The strategic plan should include the following elements:

- identification of key program stakeholders and their needs and preferences regarding the district's CNP;

- a Food Services Department mission statement;

- quantifiable goals and objectives for measuring, monitoring, and reporting efficiency and effectiveness;

- strategies with detailed action plans to implement program goals and objectives that can be monitored and reported; and

- a method for reporting plan results and tactics to resolve any unfavorable deviations from the plan or to make appropriate adjustments to the plan.

The plan should project the financial revenue and expenditures for the next three to five years. It should include assumptions about changes, such as changes in student demographics or the need for major equipment purchases and facility renovations. The plan also should include measurable goals and objectives, such as meal participation goals for every campus and a target percentage of student and staff that express satisfaction with cafeteria food as determined by surveys and taste tests.

Another key part of developing the strategic plan is the food services director's participation in the budget development process for the Food Services Department. The Business Office and the food services director jointly should develop an annual budget for the department, guided by the goals and objectives established within the strategic plan.

The food services director should schedule and facilitate strategic planning sessions with key staff, including the superintendent, campus managers, the business manager, and the director of maintenance and transportation. These planning sessions also should feature feedback from teachers, students, and parents. After the food services director compiles the information from the strategic planning sessions, the business manager should present it to the Board of Trustees for approval.

Additionally, the food services director should establish formalized processes to review and update the strategic plan before the budget planning process each fiscal year.

The district could implement this recommendation with existing resources.

FINANCIAL CONTROLS (REC. 33)

Brownfield ISD does not administer its Child Nutrition Program effectively.

An effective CNP establishes and maintains an internal control structure that supports the accuracy of financial reports, works to eliminate fraud, protects the district's resources, and helps ensure that the district complies with state and federal laws and regulations. Districts often document these internal controls in a food services operations manual.

The purpose of an operations manual is to standardize procedures throughout the district. A food services operations manual provides a written description of how the program should operate, including the food production process, collection procedures, charging of meals, verification procedures, and other program-related matters. It is also a resource for new or temporary cafeteria staff and can inform district stakeholders that may request information regarding food services operations. During onsite interviews, Food Services Department staff reported that the department does not maintain a food services operations manual.

While onsite, the review team observed that the internal controls in Brownfield ISD's Food Services Department are lacking in several areas. For example, the review team observed inaccurate entries of reimbursable meals at cafeteria cash registers. The district receives federal reimbursement for each meal served to students that meets program requirements. To be eligible for reimbursement, a student must select a meal that offers all of the required meal pattern food items in the required serving sizes. The POS is the stage in the food services operation at which staff accurately can determine that the Food Services Department has served a reimbursable meal to an eligible student. At Brownfield ISD, the POS occurs when students bring their meals to the cash register. It is the cashier's responsibility to record each student that receives a meal that can be counted and claimed as reimbursable.

However, observation at one of the cafeterias showed that the cashier did not use the POS software as students came through the line. This cashier used a breakfast sign-in form as a reference for the number of students eating the lunch meal rather than counting the students as they moved through the POS line. This practice increases the chance of meal-counting errors because it relies on the classroom teacher recording on the breakfast form to indicate which students left campus or brought lunches from home and providing this form to the

cashier. The review team observed several instances of students that did not eat a cafeteria meal but were recorded on the form as present and eating a cafeteria meal, which results in an overcount of reimbursable meals.

Another example of the Food Services Department's improper administration of the CNP is its process for monitoring prepaid meals, cash-meal sales, and deposit preparation. The department operates a system through which students, staff, and guests can purchase meals with cash or by debiting from a prepaid account stored in the district's electronic POS system. While all meals are free for all students, some student pay cash for ala-carte items or snacks. Typically, adult staff, guests, or students pay the cashier with cash for deposit into the POS system's electronic record. The customer does not receive a receipt, and the cashier enters this transaction into the system. Later, the customers make purchases by debiting their accounts for the cost of the meal or snack, also without receiving receipts for this transaction. The POS system begins and ends the year with customers' deposits stored in memory, but the balance of cash in the system is not reconciled. The lack of reconciliation of prepaid accounts or receipts makes the Food Services Department more susceptible to errors in calculations or fraud.

While onsite, the review team observed the following additional examples of the Food Services Department's lack of financial controls:

- in most cafeterias, the campus manager operates the cash register, counts the cash with another staff present, and then makes the deposit. Typically, the manager is the cashier and controls the time when the staff verifying the cash drawer approaches the register. Manipulation of the change fund could occur before this second staff is available;

- the food services secretary's duties include developing all purchase orders for the Food Services Department, modifying these purchase orders, and then preparing check generation for the purchase orders; best practices require separation of duties between purchase order generation and payment of the purchase orders; and

- the district does not perform cash audits of cafeterias.

Brownfield ISD's Food Services Department should establish and implement a food services operations manual.

The food services director, along with assistance from the campus managers and the Business Office, should develop

the manual. CNP specialists at Region 17 ESC or TDA can provide additional support as needed. The manual should describe all relevant food operation processes and regulations. These processes and regulations specifically should include establishing written procedures for the POS system, cash handling, deposits, and purchase orders that enable proper segregation of duties to deter and prevent fraud, theft, and financial impropriety.

These procedures should include the following elements:

- a written description of the district's process for operating the POS system, which should include SBP and NSLP requirements for recording reimbursable meals to ensure compliance with these regulations at every campus;

- consistent procedures implemented at all campuses for how cashiers should determine and count reimbursable meals. This process should include counting student meals as they reach the cash register, and not relying on an attendance list;

- procedures for recording deposits for prepaid meals that include issuing a receipt every time a customer deposits or withdraws funds from a prepaid account. Campus managers should reconcile prepaid accounts monthly against meals served to ensure accuracy;

- cash management procedures should involve a staff position other than manager serving as the cashier during meal periods. The manager can audit the cashier's work during and at the end of the day. This practice would separate the current cash handling process partially;

- separate duties in the Food Services Department so that the staff position generating purchase orders is not involved in paying for the goods received through the purchase orders; any modification to a purchase order should require an authorized signature acknowledging the change and original order; and

- the food services director should conduct unscheduled cash audits at each campus.

The Business Office should review and approve the completed manual and distribute it to all Food Services Department staff. The food services director should train all department staff to ensure that they understand all the procedures in the manual and how to implement them correctly. The food services director should review this

document with new staff during the hiring process, and all new Food Services Department staff should sign a copy. This copy should be kept by the Food Services Director. The district should complete the manual by the end of school year 2020–21.

The district could implement this recommendation with existing resources.

STAFFING (REC. 34)

Brownfield ISD's Food Services Department uses an inefficient staffing model for meal production and service.

Beginning in school year 2019–20, Brownfield ISD converted most district staff to an eight-hour daily schedule and eliminated most part-time positions. As a result, all of the Food Services Department staff now work 40.0-hour weeks and receive annualized pay in monthly paychecks. The exceptions to this were the food services secretary, who retired from the district and remains on staff part time, and one part-time staff at the high school cafeteria.

During onsite interviews, Brownfield ISD staff said that the Food Services Department calculates meals per labor hour (MPLH) in the five district cafeterias. MPLH is a common productivity measurement for school cafeteria, calculated by dividing the total meal equivalents (ME) for a period by the total number of productive paid labor hours for the same period. One ME equates to one reimbursable lunch. All other sources of revenue, such as reimbursable breakfasts, snacks, a la carte items, and catering sales, have a conversion factor to calculate the equivalent of one ME. Food services directors and school business managers use ME as the unit measure of productivity for CNPs when evaluating efficiency and formulating staffing patterns for budgeting. MEs are determined from meal count categories and other sources of revenue using the following factors, rounded to the nearest whole number:

- lunch – 1 lunch = 1 ME;

- breakfast – 3 breakfasts = 2 ME (factor of 0.67);

- snack – 3 snacks = 1 ME (factor of 0.33); and

- a la carte and catering – dollar amount of sales divided by free reimbursement rate plus the current USDA foods value.

The actual hours of work performed in a kitchen are productive labor hours, and include all labor charged to and paid from CNP funds for work performed.

FIGURE 6–5
BROWNFIELD ISD MEALS PER LABOR HOUR BY CAMPUS
SEPTEMBER 2019

| | | | INDUSTRY STANDARDS | |
CAMPUS	MEALS PER LABOR HOUR	DAILY MEAL EQUIVALENTS	LOW	HIGH
Bright Beginnings Academic Center	16.08	254	15.00	16.00
Colonial Heights Elementary	15.28	365	16.00	18.00
Oak Grove Elementary	14.93	713	20.00	22.00
Brownfield Middle School	18.06	575	18.00	19.00
Brownfield High School	12.90	411	18.00	19.00

SOURCES: Legislative Budget Board, School Performance Review Team, December 2019; Brownfield ISD, Average Daily Participation, September 2019.

Figure 6–5 shows the calculation of the MPLH produced by Brownfield ISD for September 2019 and the industry standards for MPLH based on the daily MEs at the individual campuses. The low and high standards refer to productivity levels of the food services operation. Brownfield ISD operates a convenience system in its CNP using food that is ready to eat. These heat-and-serve systems of food production do not require the same amount of labor as a system that produces more food from scratch. The MPLH standards are based on CNPs operating convenience systems.

As shown in **Figure 6–5**, the kitchens' rates at Colonial Heights Elementary, Oak Grove Elementary, and Brownfield High School are less than industry standards based on their MPLH calculations. Although district staff calculate MPLH, no evidence indicates that they use this information when allocating labor hours at each cafeteria, nor does the Food Services Department set goals to increase MPLH.

The district's low productivity in several of its kitchens may be a product of the district's eight-hour day staffing model. This model is not efficient for meal production and service in a school food services operation, such as Brownfield ISD's, which serves a limited breakfast menu and then lunch in the cafeteria. The limited breakfast preparation and serving does not require the same amount of labor as does the preparation and serving for lunch. Based on interviews and onsite observations, Brownfield ISD's food services operations include excess labor at breakfast in most cafeterias. This practice is more prevalent in the elementary schools because teachers and students perform much of the serving labor when providing breakfast in the classroom.

Information gathered through onsite observation and interviews also indicates that Food Services Department staff in most cafeterias face challenges during food preparation and service times at lunch. Several staff struggled to prepare and serve the food, clean the tables, remove trash between serving periods, and stock the serving line for the next group of students. In several cases, the review team observed other staff, such as teachers or teachers' aides, helping to clean tables and mop the floor. At one campus, the principal helped to remove trash between lunch periods.

Absences presented additional challenges to the Food Services Department's staffing structure, which lacks an adequate pool of available substitutes. At the time of the review team's onsite visit, the district had one available substitute food services worker, and staff said that the substitute was rarely available. The food services director often fills in when a food services worker is absent, or other staff conduct their own duties along with the absent staff's duties. Brownfield ISD staff report that the district has had difficulty hiring substitutes due to the position's eight-hour commitment.

Brownfield ISD's failure to develop a staffing formula that is based on industry standards, such as MPLH, hinders its ability to determine appropriate staffing levels for the Food Services Department. When a district does not use productivity as a basis for a staffing formula, the district is unable to ensure that it is using its resources efficiently and productively.

Effective districts provide flexible work schedules for food services staff to meet optimal labor standards. Hiring some staff to work part-time schedules may increase the pool of applicants for food services workers and substitutes. Working part time enables potential staff to align their work schedules with other jobs, obligations, or their own children's school schedules. Furthermore, hiring all food services staff for eight hours each day does not follow the industry practice of hiring part-time staff to work during certain meals to meet peak labor requirements.

Brownfield ISD should develop and implement a staffing formula based on industry standards and individual operational needs for the Food Services Department and establish a substitute pool to cover staff absences.

The food services director should collaborate with campus managers to reach industry MPLH standards at all cafeterias within three school years, set MPLH goals for each cafeteria, and adjust labor hours.

The food services director should introduce all campus managers to the process of calculating MPLH and meal equivalents. The food services director should train all managers on the process of how to improve MPLH and how to meet the assigned MPLH goals.

The district also should begin replacing food services workers that retire or resign with part-time staff. Furthermore, the district should offer current food services workers the option of changing their employment schedules to part time beginning with school year 2020–21. The model schedule for the Food Services Department is to pay the food services director and campus managers for an eight-hour day, with one skilled food services worker at each cafeteria working approximately 7.5 hours per day, and the balance of food services workers working part time, as needed. These part-time staff would work on a staggered schedule, with some preparing lunch meals and others serving meals and cleaning the cafeteria part time.

As part of implementing a staffing formula, the Food Services Department should establish a substitute pool to help ensure full coverage for absences without increasing the present staff's workload. The food services director and the campus managers should determine when substitutes are most needed to work part time. The food services director should begin the process of vetting part-time substitutes for a substitute pool as soon as possible.

The fiscal impact of this recommendation cannot be determined until the district establishes the staffing formula and determines the optimal number of food services workers at each campus.

KITCHEN FACILITIES AND EQUIPMENT (REC. 35)

Brownfield ISD's kitchen facilities and equipment lack consistent maintenance.

According to Brownfield ISD staff, the planning and oversight of kitchen facilities and equipment is the responsibility of the Food Services Department. The Food Services Department can request service from the Maintenance Department to repair facilities and equipment, but the Food Services Department is responsible for any kitchen facility audits, assessments, or replacement planning for kitchen equipment. However, the Food Services Department staff said that the department does not engage in any long-term planning for repairing or renovating kitchen facilities or replacing kitchen equipment. Instead, the district practices reactive maintenance. During onsite interviews, Brownfield ISD staff said that staff address issues with kitchen equipment or facilities only when items break down or inspectors cite facilities for local health code violations.

Staff acknowledged issues with aging kitchen equipment and facilities throughout the district. During school year 2018–19, the Food Services Department made a profit of $311,885. The food services director and CFO said that the district is using these funds to upgrade kitchen equipment at Oak Grove Elementary School.

The United States Food and Drug Administration (U.S. FDA) publishes a Food Code that provides a uniform system of provisions that address the safety and protection of food offered at retail and in food service. Local health departments use this code when inspecting businesses and organizations that prepare and serve food. Local health department inspectors have cited the district for several code violations as a direct result of the deterioration of kitchen facilities, including the following violations:

- faulty air gap connection for utensil and food preparation sinks;

- holes in the wall and flaking paint; and

- uneven floor surfaces with cracks and partial finishes.

The district had not addressed all of these issues at the time of the review team's onsite visit. For example, the review team observed several sinks in district kitchens that lacked air gap connections, which are required for all sinks used for food or utensils. These connections prevent contamination of the sink and other food preparation services from sewer water if the sinks have plumbing issues. Contamination of food preparation areas could result in foodborne illness. Best practice suggests that air gap connections on sinks are important for maintaining optimal sanitary conditions.

The review team also observed several instances of kitchen walls that had holes and flaking paint, including several located directly above sinks and food preparation areas.

Additionally, the review team observed uneven, damaged floor surfaces in several kitchens. **Figure 6–6** shows flooring in one kitchen that does not meet U.S. FDA code because it has holes that are not easily cleanable, and the vinyl tile is worn and has gaps that can harbor bacteria and insects.

In addition to the facility issues cited by local health inspectors, the review team observed the following issues within kitchen facilities that have not been repaired by the district:

- holes in the floor, ceiling, and wall junction;

- loose floor base and fixtures and equipment that is not installed properly and is not sealed to the wall or floor;

- wood shelving being used as a food contact surface, which, violates U.S. FDA code requirements; and

- exhaust ducts and exhaust hoods that were not welded fully, as required by U.S. FDA code.

Figure 6–7 shows a broken electrical conduit with exposed wires located in the pathway of the Food Services Department staff in one cafeteria.

Brownfield ISD does not maintain an inventory of kitchen equipment by campus that includes the name, description, and number of each item. The district also does not have documentation showing the repair histories of all kitchen equipment. Additionally, the Food Services Department budget does not include a category for kitchen equipment replacement. Staff reported that replacement occurs when the equipment wears out and stops working. No data are available to guide long-term equipment purchasing when the district develops its annual budget because the Food Services Department does not record repairs and breakdowns.

While onsite, the review team observed various issues with food services equipment, including the following issues:

- outdoor refrigeration vaults at several campuses are nearing the end of life, with little prospect for repair; the metal, exterior skin is broken on some of the insulated floor panels of these vaults;

- burner control knobs on ranges are missing in several kitchens;

- serving line equipment is missing thermostat knobs, and staff are using pliers to adjust temperatures;

- in one kitchen, a deep-fat fryer that has not been used for years due to USDA restrictions on this method of

FIGURE 6–6
BROWNFIELD ISD KITCHEN FLOORING
DECEMBER 2019

SOURCE: Legislative Budget Board School Performance Review Team, December 2019.

FIGURE 6–7
BROWNFIELD ISD BROKEN ELECTRICAL CONDUIT
IN CAFETERIA
DECEMBER 2019

SOURCE: Legislative Budget Board School Performance Review Team, December 2019.

cooking is located in the center of the kitchen hood near a steamer, which is in use but is not located beneath the hood because the space is occupied by the fryer. As a result, staff reported that the steamer regularly produces a large amounts of steam regularly fill the lid on top of the pan with boiling water. Staff often stand on a wet floor trying to drain some of the boiling water into the steamer cavity and into the pan below; and

• one cafeteria has a convection oven located on a four-inch concrete platform. The casters on this equipment attach to the oven on an extension sleeve, which raises the oven higher. Such improper installation presents a dangerous work environment. The pans in the convection oven's upper shelves are 12 inches to 18 inches higher than most food services workers' heads. To remove the food from the warmers, food services workers must hold the heated pans above their heads for extended periods. These pans are heavy and often filled with hot liquids and ingredients.

Figure 6–8 shows a serving line in which fruits and salads are not covered by a breath protector (sneeze guard), as required by U.S. FDA code.

Disrepair of kitchen facilities affects food preparation, adequate sanitary conditions, and safety of students and staff. Engaging in reactive maintenance, rather than having an effective plan for preventive and deferred maintenance, could result in unexpected kitchen facility problems or a reduction in the working lifetime of kitchen facilities and equipment.

The practice of not replacing aged or damaged kitchen equipment may decrease efficiency in food preparation and meal service because staff are unable to use equipment properly. The lack of a preventive maintenance program could lead to more frequent repairs. When a food services operation delays cleaning, filter replacement, and maintenance, equipment does not run as efficiently.

The lack of an inventory for equipment age and repairs also risks insufficient funds being budgeted for capital replacement. Therefore, the department would not be prepared if multiple equipment items break down during the same year. Additionally, the Food Services Department is not able to maintain accurate records regarding total costs of the operation without including costs for equipment maintenance.

Brownfield ISD should formulate and implement a preventive maintenance and replacement program for all food services equipment and facilities.

FIGURE 6–8
BROWNFIELD ISD SERVING LINE WITHOUT A BREATH PROTECTOR
DECEMBER 2019

SOURCE: Legislative Budget Board School Performance Review Team, December 2019.

The food services director, with assistance from the maintenance director, should develop long-range and short-range plans for upgrading the kitchen facilities beginning in school year 2020–21. Both plans should determine the most urgent kitchen facility needs and estimate the costs of potential renovations and repairs. The short-term plan should prioritize repair work that Brownfield ISD Maintenance Department staff can perform in the afternoon when the kitchen is empty. The short-term plan also should include a summer repair list including priorities that staff can accomplish when students are not present. Additionally, the long-term plan should identify five-year goals for improving kitchen facilities. After completing the plans, the food services director should submit them to the Business Office and the superintendent for approval.

The Food Services Department should conduct an inventory of all kitchen equipment in the district. The inventory should

include the location, age, description, number, and working condition of each piece of equipment, and an estimate of the repair history for each piece. This information should be entered into the district's asset database. This inventory should be readily accessible by the food services director and the Business Office. The district should conduct a similar inventory annually in the summer and require the recording of repair records for all equipment in the district's asset database. The district also should collaborate with the Business Office to plan the disposal of unwanted equipment.

The food services director should collaborate with the maintenance director to develop a list of preventive maintenance by type of equipment in the campus cafeterias. Maintenance staff could perform this preventive maintenance during the summer, when the kitchens typically are not in use. Staff should use a checklist to ensure that all maintenance items are completed and should complete this process annually.

The food services director also should establish an equipment replacement plan and submit it to the Business Office for approval beginning in school year 2020–21. This replacement plan should include a priority list of pieces of equipment by campus to be replaced, based on frequency of repair and estimated age. As the budget allows, the Food Services Department then should purchase and install new equipment, and remove and dispose of the old equipment in a timely manner.

No fiscal impact can be determined for this recommendation until the district has completed a kitchen facilities maintenance plan and an equipment replacement plan. These plans will include potential costs of repairs, equipment purchases, and renovations. Depending on the cost estimates, this recommendation could be funded with Food Services Department funds.

USDA-DONATED FOODS (REC. 36)

Brownfield ISD's Food Services Department does not budget or manage effectively the foods donated by the USDA.

All campuses participating in the NSLP are eligible to receive USDA-donated foods through the USDA's Food Distribution Program. This program supports American agricultural producers by providing nutritious, USDA-purchased food to nutrition programs in public schools. In addition, this program enables school districts to contract with commercial food processors to convert raw bulk USDA-donated foods into more convenient, ready-to-use products. USDA-

donated foods, formerly known as the commodity foods program, help the district lower food costs by providing domestically produced foods to the CNP. Every dollar's worth of USDA-donated foods used in a school menu saves funds that otherwise would be spent on commercial food purchases. Effective school districts use USDA-donated foods as a valuable resource to keep local food services budgets in the black. The federal government's large volume-purchasing power is an important factor in maintaining school food services budgets because it can provide the procurement of food at a lower unit cost than if a school were purchasing equivalent commercial foods on its own. The district selects foods for campuses to supplement commercially purchased products. According to USDA, on average, USDA-donated foods account for approximately 15.0 percent to 20.0 percent of the cost of a student meal.

Within the structure of the USDA's Food Distribution Program, it is the district's responsibility to ensure that it is receiving the full value of credits, discounts, and rebates and that it is in compliance with federal regulations. USDA requirements state that districts oversee the use and crediting of the value of USDA-donated foods they receive, including entitlement, bonus foods, and the value of USDA-donated foods contained in processed products. Successful food services programs' monitoring activities typically include the following tasks:

- designating the position that will monitor the credits, discounts, and rebates;

- examining the invoices and other documentation provided by the USDA's Food Distribution Program;

- determining the percentage of credits, discounts, and rebates reported in relation to the value of food purchased early in the year as a benchmark for comparison;

- calculating the average credit-purchase proportion received, discount, or rebate received;

- examining products to ensure that domestic commodities are purchased to the maximum extent practicable; and

- visiting storage facilities to observe the origins of purchased food printed on food labels and case units.

Brownfield ISD's Food Services Department has charged the food services director with monitoring USDA credits, discounts, and rebates; however, the district does not have

consistent processes to implement other monitoring activities. For example, the district lacks a consistent process to budget or account for usage of USDA-donated foods. The district reports donated foods as revenue and as an expense during May annually. USDA regulations state that districts must monitor receipt and use of USDA Foods, but cannot include USDA Foods in financial reports. Additionally, the district does not maintain USDA-donated food inventories consistently, which increases its risk for being unable to demonstrate compliance with federal regulations. The district also reports on the financial statement the equal distribution of USDA-donated foods to each campus without accounting for the actual amount delivered to each campus.

Failure to ensure that the district allocates USDA-donated food values accurately increases the risk of the district losing resources that could reduce food costs. Donated foods are a vital part of CNP revenue, constituting up to 20.0 percent of the food budget. Noncompliance with the USDA's requirements for the accountability, storage, and use on the menu of donated foods could result in termination of the USDA food agreement.

The USDA-donated foods Toolkit for CNPs is a collection of resources to assist child nutrition professionals in using their USDA-donated foods effectively. Region 17 child nutrition specialists also serve as a resource for developing and evaluating the district's procedures for monitoring USDA-donated food use and crediting.

Brownfield ISD should develop and implement written procedures to manage and monitor foods donated by the USDA.

The food services director should develop the procedures and submit them to the business manager for approval. The food services director, with the support of Region 17 child nutrition specialists, should develop written procedures for monthly and annual monitoring tasks related to USDA-donated foods, both regular and processed. The food services director should also prepare and review reports comparing the use and crediting of donated foods to benchmarks from the beginning of the school year and previous years. The procedures should ensure that monthly financial statements note the value of the USDA-donated foods and that they are costed for expenditure purposes. Additionally, the procedures should require that the staff maintains records noting the amount of donated foods sent to each campus.

The district's written procedures also should address all required monitoring tasks and best practices from the

USDA's toolkit. Furthermore, the food services director should attend training through Region 17 and free online webinars offered by the USDA.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

During the onsite review, 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.

COMPENSATORY TIME

Brownfield ISD adopted a compensatory time system for food services staff beginning in school year 2019–20. A compensatory time system is one in which staff accrue paid time off for each hour they work per week that exceeds 40.0 hours. The district awards compensatory time to staff instead of overtime pay. During onsite interviews, food services workers and campus managers said they were unaware of how the district's compensatory time system works. They reported not understanding when the district authorized them to take compensatory time, how it is accrued, and whether it will expire if they do not use it. Additionally, the staffing structure of the Food Services Department requires all staff to be present daily for the cafeterias to operate effectively. As a result, Food Services Department staff said that the structure does not provide days during which they could use any compensatory time that they accrued. Overall, staff reported feeling frustrated and confused by the district's compensatory time system, and several said that it was affecting staff morale negatively. A representative from the Business Office should conduct a training with all Food Services Department staff regarding how the compensatory time system functions at Brownfield ISD. This training should involve a discussion of when and how staff can use the compensatory time they have earned and enable staff to ask questions.

FOLLOWING APPROVED WORK SCHEDULES

Brownfield ISD's Food Services Department staff does not adhere consistently to approved work schedules. The review team observed that some food services staff in cafeterias start work in the morning before their scheduled times and without entering their beginning work times in the department's time clock. These staff then clocked in at the correct time after starting job tasks and performing work.

Food Services Department staff should begin work at their scheduled times. Otherwise, the school district is responsible for compensating the additional time of work performed. In addition, any injuries incurred before the scheduled work time may be challenged or denied as part of a workers' compensation claim.

SAFETY OF MILK SERVED IN THE CLASSROOM

Food Services Department staff transport the milk they serve during Breakfast in the Classroom at both elementary campuses without ice, and staff deliver milk to the classrooms up to 30 minutes before students drink it. The review team measured the temperature of the milk at the time students would consume it, and its temperature was high enough to pose a potential hazard. Foods, such as milk, served at incorrect temperatures affect quality, safety, and acceptance of the product. The district should implement a method to keep the milk within approved temperatures either by delivering it with ice or closer to the time when students would consume it.

NUTRITION EDUCATION

The Food Services Department does not provide nutrition education to students, other than posters containing nutritional information that are displayed in the elementary school cafeterias. The district should consider adding nutrition education as a part of its educational curriculum and include the Food Services Department in developing and presenting this information.

ACCOUNTING FOR INDIRECT COSTS

The district does not charge the Food Services Department for services provided by other departments. The district provides custodial, technology, support for human resources and payroll, and facility space usage at no cost to the Food Services Department. The department pays for its own electricity usage. USDA provides indirect cost guidance to districts that operate CNPs, such as the following costs:

- custodial services;

- payroll and financial services;

- human resources;

- workers' compensation;

- procurement;

- gas;

- electricity;

- sewer;

- water; and

- trash.

According to the USDA's guidance, indirect costs are incurred by CNPs for the benefit of multiple programs, functions, or other cost objectives and, therefore, cannot be identified readily and specifically with a particular program or other cost objective. CNPs typically support administrative overhead functions such as additional benefits, accounting, payroll, purchasing, facilities management, and utilities. Brownfield ISD is paying for many of these indirect costs incurred by the Food Services Department.

The Texas Education Agency's guidance on indirect cost percentage rates requires districts to identify the indirect costs, report the calculation method used to generate the indirect cost rate, and document the process in the Food Services Department's financial management procedures.

Considering Brownfield ISD's Food Services Department fund balance of $311,885 during school year 2018–19, the Food Services Department should evaluate the indirect costs that it is receiving from other district departments and consider allocating the costs to enable the Food Services Department to continue to manage its fund balance appropriately. The district should contact Region 17 or TDA for assistance with submitting a plan for indirect costs.

FISCAL IMPACT

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

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

7. INFORMATION TECHNOLOGY MANAGEMENT

Brownfield Independent School District's (ISD) Technology Department manages the district's network, hardware, and software support needs. The assistant superintendent supervises the Technology Department, which includes the technology director and two technology specialists. For school year 2018–19, Brownfield ISD budgeted approximately $592,879 for technology.

FINDINGS

♦ Brownfield ISD does not have an efficient long-range planning process for technology.

♦ Brownfield ISD lacks clearly defined teacher expectations for instructional technology, resulting in a lack of technology integration into classroom instruction.

♦ Brownfield ISD's obsolete help desk system limits the Technology Department's ability to evaluate its own performance.

♦ Brownfield ISD provides limited professional development for staff in the Technology Department.

RECOMMENDATIONS

♦ **Recommendation 37: Prepare and maintain a current technology plan aligned with identified district needs and goals.**

♦ **Recommendation 38: Adopt clear expectations for teachers regarding technology competence that meet statutory requirements.**

♦ **Recommendation 39: Replace the obsolete help desk system with a system that generates daily reports and provides data measures for efficient and effective technology support.**

♦ **Recommendation 40: Determine an optimum skill level for technology staff and provide necessary professional development to reach an efficient staff performance level.**

BACKGROUND

An independent school district's technology management affects the 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 a part of the teaching and learning process (e.g., integration of technology in the classroom, virtual learning, and electronic instructional materials). Instructional technology supports curriculum delivery, classroom instruction, and student learning.

The technology director oversees the Brownfield ISD Technology Department, performs administrative network duties, and manages the district website and databases. The technology specialists manage the district's helpdesk system, resolving a range of technology issues from setting up an Internet connection to initiating student log-in user identifications and passwords. Technology staff tag and inventory technology equipment, update software on district computers, and install interactive boards in classrooms. **Figure 7–1** shows the organization of the Brownfield ISD Technology Department.

DETAILED FINDINGS

TECHNOLOGY LONG-RANGE PLANNING (REC. 37)

Brownfield ISD does not have an efficient long-range planning process for technology.

The Legislative Budget Board's School Performance Review Team visited the district during December 2019. At the time of the review team's onsite visit, stakeholders had little involvement in technology planning. The technology director said that a districtwide technology committee

previously existed, but the district did not have one for school year 2019–20. Technology is discussed in the district's leadership committee, but staff reported that the topic typically is sidelined during meetings. Campus staff said that they did not know of any current technology planning efforts at the district or campus levels.

The district provided a rolling five-year budget for technology spending to the review team, but it did not include all technology items. The technology director said that routine annual technology expenses historically have not been budgeted, and not all technology requests have received funding each year. The assistant superintendent said that the district budgets from $100,000 to $125,000 per year for technology. However, the district has not researched technological devices' life spans or developed a plan for replacing items.

During school year 2018–19, Oak Grove Elementary School purchased desktop computers for its campus library. However, campus staff said that teachers prefer to use the computer labs on portable carts that they can take to their classrooms. While onsite visit at the middle school, the review team observed a classroom that served as storage for outdated computer hardware. The technology director reported not knowing that these items were in storage.

Several leadership staff said that the district is planning to acquire and use more technology. The technology director said that the district has made efforts recently to increase the technology infrastructure and the amount of technology available to students and campus staff. Several leaders spoke of imminent plans to establish a learning environment in which every student has access to a computer. However, this goal is not listed in any district planning documents, nor has a timeline been established for this initiative.

In May 2019, Brownfield ISD voters approved a $40.0 million bond package to build a new high school campus, provide security improvements for the remaining campuses, and upgrade playgrounds at the two elementary school campuses. Staff reported that technology upgrades are included in the cost for the new high school campus, but the bond package does not include a specific or general item for this purpose. The superintendent said that the district would use remaining bond funds to fund technology and other items, such as safety and security. He also said that the district has added $1.5 million into its fund balance during the past two years, with the intention of spending it on technology.

FIGURE 7–1
BROWNFIELD ISD TECHNOLOGY DEPARTMENT
SCHOOL YEAR 2019–20
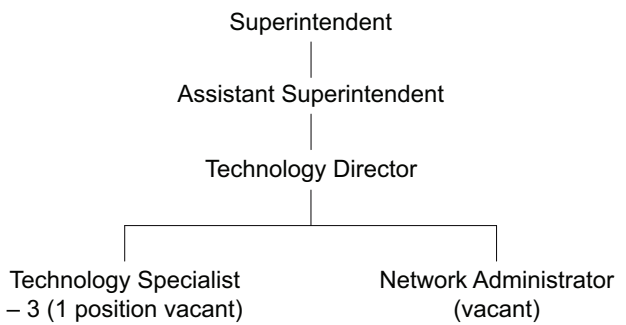
SOURCE: Brownfield ISD, December 2019.

FIGURE 7–2
BROWNFIELD ISD CAMPUS STAFF COMPUTER TYPE PREFERENCES
SCHOOL YEAR 2019–20
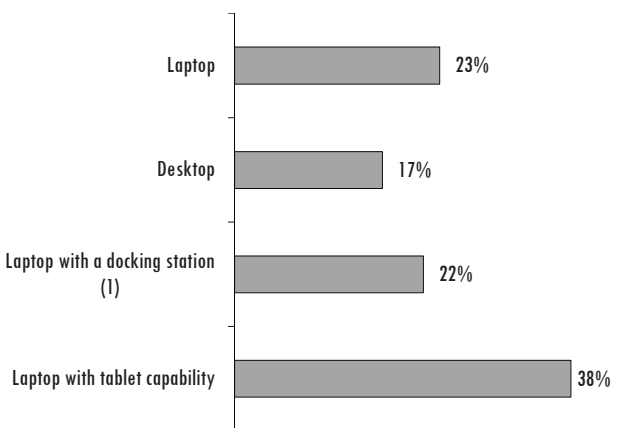
NOTE: (1) A docking station enables connection between the laptop computer and other devices.
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

The superintendent said that, as part of a larger initiative, the district is defining a standard for technology to ensure that all campus staff and students have access to the same technology devices. The district surveyed campus staff regarding their preferred computer types for providing instruction. **Figure 7–2** shows that most staff prefer a laptop computer with tablet capabilities.

The district also planned to send one staff from each campus to the Texas Computer Education Association (TCEA) conference in spring 2020 with the goal of finalizing this technology standard in May 2020. TCEA is a nonprofit organization that supports the use of technology in education.

The Texas Education Code, Section 11.251(a), requires districts to develop an annual district improvement plan (DIP) to guide district and campus staff toward improving students' academic performance. The district also must oversee the annual development of a campus improvement plan (CIP), which serves as the guideline for how each campus will address the objectives and goals in the DIP. The Texas Education Code, Section 11.252(a)(3) states that the DIP must contain strategies for improving student performance that include the integration of technology in instructional and administrative programs. The district did not provide CIPs for school year 2019–20.

CIPs for school years 2016–17 to 2018–19 show that the technology goal for the district has remained the same. The school year 2018–19 CIPs for each Brownfield ISD campus state the same sixth goal: "to utilize or implement technology to increase the effectiveness of student learning, instructional management, and staff development." In addition, the high school CIPs from school years 2016–17 to 2018–19 each include these five strategies to reach the technology goal:

- laptop or tablet computers will be provided to all faculty and staff;

- two computer labs will be available for all students before, during, and after school hours;

- computer labs on carts are available to classrooms for students;

- technology training will be provided to teachers when needed; and

- technology infrastructure will be updated at the Brownfield High School campus to provide increased use of technology in the classroom.

The CIPs do not appear to have been reviewed and revised each year as required by the Texas Education Code, Section 11.251, and some of the school year 2018–19 CIPs still reference completion dates in 2016.

Lacking a clear plan and associated funding for technology can result in inefficient spending on equipment and devices that remain unused. Lack of planning also results in students and staff using devices that may no longer meet the district's needs.

A well-written and well-implemented technology plan provides a framework for effective planning and decision making, and supports the district in achieving its stated goals. Technology plans typically include goals, action plans, timelines, performance and success measures, designated staff responsible for each step in each action plan, and financial allocations. The National Center for Technology Planning (NCTP) is an organization that works to collect and disseminate information on school technology planning. NCTP recommends these five phases for an effective planning model:

- recruit and organize the planning team – the planning team should consist of all stakeholder groups, and members should excel in planning and communication skills; stakeholders may include technology specialists, district leaders, parents, students, and community and business representatives;

- research – conduct a needs assessment and identify how specific technologies can be applied to those needs;

- construct the technology plan – apply the research toward establishing the district's vision and mission and defining the goals and objectives that will lead to fulfilling that vision and mission;

- formalize the planning – synthesize the district's research and plan into a comprehensive document that analyzes the district's present technology, articulates specific goals and objectives, incorporates clearly defined strategies and budgetary plans to realize the desired level of technology, and includes a process for evaluation; and

- continually implement, evaluate, and revise the plan to promote progress toward meeting the district's technology goals.

Seattle Public Schools has a five-year technology plan for school years 2019–20 to 2022–23 that aligns the district's goals to student achievement and state student achievement standards. The plan also specifies the sources and allocation of funding for this purpose. The district formed an Information Technology Advisory Committee, including staff from different district departments and campuses, parents, and community representatives, to provide input on the plan.

Brownfield ISD should prepare and maintain a current technology plan aligned with identified district needs and goals.

The superintendent should select a range of staff from the central office and campuses to serve on a standing technology

FIGURE 7–3
BROWNFIELD ISD TECHNOLOGY DEVICE INVENTORY
SCHOOL YEAR 2019–20

FACILITY OR CAMPUS	DOCUMENT CAMERAS	INTERACTIVE BOARDS	INTERNET PROTOCOL PHONES	TABLET COMPUTERS	DESKTOP COMPUTERS	LAPTOP COMPUTERS	TOTAL
Brownfield ISD Administration Building	0	0	12	321	9	104	446
Bright Beginnings Academic Center	0	6	0	43	20	12	81
Brownfield Education Center	0	0	0	0	0	4	4
Colonial Heights Elementary School	0	22	0	19	17	21	79
Oak Grove Elementary School	29	0	0	90	4	66	189
Brownfield Middle School	0	0	0	77	4	239	320
Brownfield High School	1	0	0	9	47	167	224
Total	**30**	**28**	**12**	**559**	**101**	**613**	**1,343**

Sources: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

advisory committee, which also should include staff from the Technology Department, community representatives, and parents. The technology director should chair the committee, which should review and address the following issues:

- the district's standard for use of technology in teaching and learning;

- adoption of a computer replacement cycle into the regular budget development process;

- how the district will measure use of currently available technology (e.g., whether high school students regularly use library computers); and

- how the technology plan will support other district plans.

The district should develop and integrate into the plan a detailed hardware migration and replacement strategy based on the district's vision for a technology standard.

The committee should draft a five-year technology plan that includes clear milestones, expected achievement dates, accountability mechanisms, and a detailed cost summary, including funding sources. The superintendent should present the plan to the board for review and approval. The superintendent regularly should review with the board the district's progress in implementing the plan.

The district could implement this recommendation with existing resources.

INSTRUCTIONAL TECHNOLOGY (REC. 38)

Brownfield ISD lacks clearly defined teacher expectations for instructional technology, resulting in a lack of technology integration into classroom instruction.

At all grade levels, Brownfield ISD teachers have access to a range of technology in the classroom, including software and online resources. **Figure 7–3** shows the devices including desktop, laptop, and tablet computers assigned to each campus.

Most of the items shown at the administration building are stored in the Technology Department offices for eventual use by the campuses. However, review team observations show that the inventory is incomplete and does not account for interactive boards at all of the campuses, including new interactive boards that Oak Grove Elementary School received during fall 2019. The primary software or applications available to teachers are Achieve 3000, Smarty Ants, Discovery Ed, Pearson, Reading A to Z, Imagine Math, Kahoot, and DynEd for English as a second language students.

District leaders said that teachers have varying skill levels in using technology in the classroom and integrating technology into the learning process. The district lacks explicit, written expectations regarding how teachers should be using technology in the classroom, but some administrators said that the district recently has raised its expectations, at least informally.

The review team visited all district campuses to observe technology use in the classrooms. **Figure 7–4** shows the number of classrooms using technology, as observed.

Although the majority of classes used some technology at the time of observation, it most often was used at a foundational level. At the high school, most teachers were using their interactive boards to display slideshow presentations; at the middle school, most teachers were using their document cameras as projectors. Students rarely used technology directly outside of the computer labs, despite the availability of tablet and laptop computers in classrooms. High school students were engaged in using technology directly in six of 17 classrooms, one of which was a computer applications class.

The district does not have a formal plan for teachers to receive ongoing professional development for instructional technology, and district leadership acknowledged that technology is not being used to its full capacity in the classrooms. Several staff said that teachers have few local resources to learn how to use instructional technology well. The technology director reported that teacher training at the beginning of the school year focuses on basics, such as how to log on to a computer, how to submit a help desk ticket, and an introduction to using the interactive board. The district's instructional specialists have multiple responsibilities, only one of which is to help teachers with technology.

Several staff said that trainings on new devices and applications, such as interactive boards and the Microsoft Office 365 software suite, were limited and introductory in nature. Meanwhile, district leaders said that training on existing technology resources was not needed because teachers already know how to use them. Teachers in a focus group expressed disagreement, with staff reporting that they were not able to use their laptops during the Office 365 training, and that the training did not address administrative technology features that staff are expected to use regularly, such as downloading and sharing files. Additionally, staff said that they have not received additional training on educational software and applications that the district owns. Other campus staff said that teachers receive information about applications that are available to them, but the review team could not determine whether staff are using those applications for instruction.

Brownfield ISD conducted an internal teacher survey during December 2019, which indicated that 38.0 percent of teachers were very or extremely confident in their abilities to develop technology-based lessons, excluding the development

FIGURE 7–4
BROWNFIELD ISD TECHNOLOGY USE IN CLASSROOMS DECEMBER 2019

CAMPUS	CLASSROOMS OBSERVED USING TECHNOLOGY	PERCENTAGE
Bright Beginnings Academic Center	6	83.0%
Colonial Heights Elementary School	12	75.0%
Oak Grove Elementary School	26	65.0%
Brownfield Middle School	20	65.0%
Brownfield High School	17	65.0%
Total	**81**	**68.0%**

SOURCE: Legislative Budget Board School Performance Review Team, December 2019.

of presentations. When considering whether they would attend technology classes without the possibility of receiving a stipend, 81.0 percent of teachers said they would attend half-day classes during the summer and 72.0 percent said they would attend one-hour training sessions after school.

The absence of explicit expectations for how teachers should use technology in the classroom results in a lack of coordination and technology integration into classroom instruction. Investments in equipment and infrastructure do not yield benefits when teachers are not held accountable for improving their pedagogy through technology integration.

The use of classroom technology enhances the teaching process, helps students to learn course material, and prepares them for technology use in the workforce. A curriculum that incorporates technology improves instructional material and familiarizes students with technology.

The Texas Education Code, Section 21.044(c–2), addresses educator preparation. It requires new teachers to receive training on instruction in digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum. The required instruction must include these:

- align with the International Society for Technology in Education's standard for teachers;

- provide effective, evidence-based strategies to determine an individual's degree of digital literacy; and

- include resources to address any deficiencies identified by the digital literacy evaluation.

These requirements were adopted in June 2017, making Texas the first state to enact the International Society for Technology in Education (ISTE) standards in law. ISTE is a nonprofit organization that serves educators interested in the use of technology in education. The ISTE Standards for Educators define the fundamental concepts, knowledge, skills, and attitudes for applying technology in educational settings. The standards define the following roles for teachers in using technology:

- learner – learn from and with others and explore promising practices that leverage technology to improve student learning;

- leader – seek opportunities to support student empowerment, help shape a shared vision, and advocate for student equity;

- citizen – inspire students to contribute responsibly in the digital world and guide them to be curious, wise, empathetic, safe, and ethical;

- collaborator – collaborate with others to improve practice, discover and share resources, and solve problems with others;

- designer – design authentic, learner-driven activities and environments that recognize and accommodate learner variability;

- facilitator – model creative expression, empower students to take ownership of their learning, and provide opportunities for students to innovate and solve problems; and

- analyst – use data to direct instruction and provide alternate ways for students to demonstrate competency and use assessment data to guide progress.

Brownfield ISD should adopt clear expectations for teachers regarding technology competence that meet statutory requirements.

The superintendent should review the state-adopted ISTE standards for new teachers and discuss them with the assistant superintendent, principals, technology director, instructional specialists, and teachers. The superintendent and principals should collaborate to adopt the same standards for all Brownfield ISD teachers, and develop systems to evaluate whether all teachers are meeting those expectations. The superintendent and principals should communicate the standards and expectations to teachers and staff and provide a

timeline for expected implementation. The superintendent also should communicate these expectations to the staff tasked with preparing the CIPs for inclusion into those documents.

The instructional specialists should develop a rubric to assess the skills of teachers in the classroom and provide the rubric for principals and instructional specialists to use when conducting classroom observations. Teachers identified through this process as requiring additional training should coordinate with an instructional specialist individually or in small groups, as needed.

To assist teachers in fulfilling the expectations for technology integration, the district should make funding available for ISTE certification, which includes 30.0 hours of coursework (12.0 hours in person and 18.0 hours online), and costs $800 per person. In Texas, ISTE certification is available through TCEA. The assistant superintendent should collaborate with campus principals to evaluate which staff would benefit from the training and become the first cohort to pursue ISTE certification, with a goal of ensuring that all teaching staff receive certification.

No fiscal impact is assumed until the district identifies the number of staff in the first cohort to pursue certification.

HELP DESK SYSTEM (REC. 39)

Brownfield ISD's obsolete help desk system limits the Technology Department's ability to evaluate its own performance.

District staff use a help desk system to request assistance from Technology Department staff. When staff submit a technology help desk ticket, Technology Department staff receive an email documenting the name and location of the requesting staff, a brief description of the issue, and its priority level. If the Technology Department receives a maintenance request ticket in error, the technology director contacts the director of maintenance and transportation with the ticket details. At the time of the onsite visit, district staff said that the Eduphoria educational management software has begun discontinuing its support of the Technology Department's help desk system and the Maintenance and Transportation Department's work order system. The technology director and director of maintenance and transportation are searching for a replacement help desk system.

Although district staff did not report any difficulty using the help desk system, they said that it could take days to get a ticket resolved, even tickets marked as urgent. To ensure that

technology staff treat a ticket as urgent, campus staff said that they would ask the principal to contact the Technology Department. Staff cannot see the status of their tickets once submitted, and they do not receive an estimate of when the issue will be resolved. The assistant superintendent reported discussions with the technology director about improving communications regarding help desk ticket receipt and resolution time.

Staff report that they have been instructed to submit a help desk ticket and not to request direct help from a technology specialist, even if the issue is minor, such as reconnecting a computer to the district's Internet provider, and the specialist is on campus. Several campus staff said that they assist in basic troubleshooting efforts, such as checking that equipment is plugged in correctly, to avoid submitting a help desk ticket. However, even minor problems, such as resetting a password, require administrative rights exclusive to technology staff. Other staff said that the waiting period to resolve a ticket is frustrating because staff need functioning equipment to teach the curriculum, and students need it to complete lessons or projects.

The help desk system dashboard does not display performance data that the technology director could use to identify areas for improvement in a visible manner. Performance data include the following elements:

- summaries and comparisons of the productivity of each technology specialist, including the number of help desk tickets resolved and the time required to complete each ticket;

- the specific areas in which assistance was needed; and

- cumulative totals for tickets opened and closed each day, and the average time for ticket completion.

The technology director said that he had not used the performance data in the district's current help desk system. The Technology Department does not publish performance metrics or track them for management purposes, nor does it review data or trends in how long technology staff require to complete a ticket. Additionally, the department does not request feedback from staff regarding the quality and timeliness of the work completed.

The technology director reported that the department receives about 150 help desk tickets during an average month. Other staff said that technology staff put tickets on hold when they are required to work on priority items, such as updating computers for state-mandated

testing. Campus staff said that they submit multiple tickets for the same issue if technology staff do not address the issue in a timely manner.

Failure to compile help desk system data routinely limits the Technology Department's ability to provide efficient and effective service to staff, and identify areas for improvement. Additionally, requiring staff to submit a help desk ticket for minor problems while a technology specialist is on campus unnecessarily prolongs the time that tools for classroom instruction remain out of service.

Keller ISD has established metrics to ensure that its help desk system is responding effectively to submitted tickets and communicating the progress to staff. The district also has set goals to monitor the following specific metrics:

- incident acknowledgement time;

- incident resolution time;

- workstation request completion time;

- service desk first-contact resolution;

- service desk abandonment rate; and

- service desk speed to answer.

Brownfield ISD should replace the obsolete help desk system with a system that generates daily reports and provides data measures for efficient and effective technology support.

The technology director should collaborate with the director of maintenance and transportation to complete the following tasks:

- develop criteria and review options for the new help desk system;

- develop performance metrics for the help desk system to use in evaluating department performance; and

- ensure that the selected system can provide data for those metrics.

Metrics for the Technology Department should include the following elements:

- the general subject area of the ticket request (e.g., reset a password, trouble printing);

- the average time in hours to respond initially to a help desk ticket;

- the average time in hours to close a ticket;

- the number of tickets completed by each technology specialist for a set period; and

- a satisfaction rating by the originator of the ticket.

The technology director should compile all of the metrics daily to manage department operations and identify areas for improvement. The technology director should post monthly reports on the Technology Department's webpage and annually submit a report to the superintendent.

Additionally, the technology director should analyze the number of help desk tickets by subject area and determine whether the number of tickets in a specific area can be reduced by providing administrative rights to select campus staff at each campus to handle minor issues, such as reconnecting a computer to the Internet or resetting a password, or by publishing end-user guides for common ticket items, such as fixing printer problems.

No fiscal impact is assumed until the district identifies the recommended help desk system.

TECHNOLOGY STAFF TRAINING (REC. 40)

Brownfield ISD provides limited professional development for staff in the Technology Department.

Technology Department staff serve the district's five campuses and the Brownfield ISD Administration Building/Brownfield Education Center/Disciplinary Alternative Education Program. The staff help set up district presentations and troubleshoot issues with computers and interactive boards. At the time of the review, the Technology Department had experienced staff turnover, and two of the three technology specialist positions were filled. Staff said that training for new technology specialists consists primarily of shadowing existing technology specialists, regardless of the length of existing staff's tenure at the district.

The technology director said that he and other department staff are too busy to attend training. In addition to leading the Technology Department, the technology director also performs network administrator duties while that position is vacant, assists the district's Public Education Information Management System coordinator on database administration, and oversees new software installations for other district departments as needed. The technology director also is researching the technology needs of the new high school that the district plans to build with the 2019 bond funds.

In September 2019, the district purchased new interactive boards for Oak Grove Elementary School to increase technology usage in the classroom. Technology staff said that they did not receive training on the new interactive boards, but they were expected to provide support for issues with the new equipment.

According to staff, the only training that one of the technology specialists attended was on basic cybersecurity at Regional Education Service Center XVII (Region 17), during school year 2018–19. Although staff say they would welcome the opportunity for additional training, the district has no plans to provide the Technology Department staff additional training or technical certification programs. Technology staff report being told by district leadership that they could pursue certification on their own time.

The job description for the technology specialists requires a high school diploma and some knowledge and ability with computer hardware and software. The department has not established minimum training levels for each position or developed programs to align professional development with the individual's job responsibilities and initial skills. Additionally, campus staff said that the turnover of technology specialists has resulted in a gap in knowledge, which is apparent by the reports of long wait times to answer help desk tickets. The superintendent said that the district's initiative to use more technology in the classroom has intensified the demand for technology staff assistance.

Keeping pace with changes in technology is a core job duty for technology specialists. If technology staff are not trained adequately to assist the district as its needs increase, then help desk tickets may remain unaddressed for longer periods, hindering district and campus staff's ability to perform their duties effectively.

ISTE emphasizes the importance of continuous staff development for technology staff. ISTE's Technology Support Index rubric identifies highly efficient school districts as having the following staff development practices:

- a comprehensive staff development program is in place that affects all staff; the program is progressive and balances incentive, accountability, and diverse learning opportunities;

- online training opportunities are provided for staff onsite and remotely, and represent a diversity of skill sets;

- a process and delivery system has been established for immediate training and is used consistently;

- expectations for all staff are articulated clearly and are broad in scope; performance expectations are incorporated into work functions and are part of the organizational culture;

- technology staff receive ample training as a normal part of their employment, including training toward certification; and

- basic troubleshooting is incorporated into the professional development program and is used as a first line of defense in conjunction with technical support.

Brownfield ISD should determine an optimum skill level for technology staff and provide necessary professional development to reach an efficient staff performance level.

The superintendent should collaborate with the technology director to determine the district's technology goals, assess the skill level of technology staff, and develop a list of professional development opportunities for technology staff based on identified staff needs and the district's technology goals. Professional development could consist of internal training sessions or courses delivered in the classroom or online. The technology director also should collaborate with the business manager to incorporate professional development for technology staff as part of the district's annual budget, including funding to reimburse technology staff for the cost of certification programs and testing that align with the district's technology goals.

No fiscal impact is assumed until the superintendent and technology director determine the professional development needed for technology staff.

ADDITIONAL OBSERVATION

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

Brownfield ISD's Internet service is provided through Region 17. District leadership staff said that the district purchases sufficient bandwidth for its needs. However, many campus staff reported that the district's inadequate wireless network capacity makes it difficult to use technology in the classroom and during staff training. For example, some staff said that connecting more than 12 computers to the campus wireless network may slow the connection for all computers or cause another computer to become disconnected. Other staff said that the network capacity is not consistent throughout the district or even within the same campus. For example, tablets or laptops that have adequate connectivity in one classroom may not have it in another. Difficulty maintaining a reliable Internet connection limits teachers from using online instructional resources. It also can prevent students from completing classwork that requires conducting research or using the district's educational literacy software applications. The technology director should perform a connectivity study of the district's Internet service to determine whether more bandwidth or access points are needed, or if the issue requires another solution.

FISCAL IMPACT

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

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

8. SAFETY AND SECURITY MANAGEMENT

Brownfield Independent School District's (ISD) superintendent oversees safety and security in the district. Brownfield ISD has two school resource officers, who are commissioned by the Brownfield Police Department and employed by the district. **Figure 8–1** shows the organization of staff responsible for safety and security. For school year 2018–19, the district spent $278,174 for safety and security, including $144,827 for security equipment upgrades and additions.

FINDINGS

♦ Brownfield ISD does not have a safety and security committee as required by the Texas Education Code.

♦ Brownfield ISD does not have a current multihazard emergency operations plan and lacks a process to monitor and implement emergency operations procedures in a concerted manner.

♦ Brownfield ISD has inconsistent procedures and limited safety equipment to address campus security.

♦ Brownfield ISD does not have a process to evaluate and develop crisis training for staff.

RECOMMENDATIONS

♦ **Recommendation 41: Form a safety and security committee to formalize safety and security processes in the district.**

♦ **Recommendation 42: Implement and update the district's multihazard emergency operations plan.**

♦ **Recommendation 43: Evaluate district facilities to assess the need for additional safety upgrades.**

♦ **Recommendation 44: Survey staff to identify training that would support emergency preparedness.**

BACKGROUND

An independent school district's safety and security function identifies physical and environmental vulnerabilities and includes strategies to minimize risks to ensure a protected learning environment for students and staff. This protection includes a balanced approach of prevention, intervention,

FIGURE 8–1
BROWNFIELD ISD SAFETY AND SECURITY STAFF ORGANIZATION
SCHOOL YEAR 2019–20
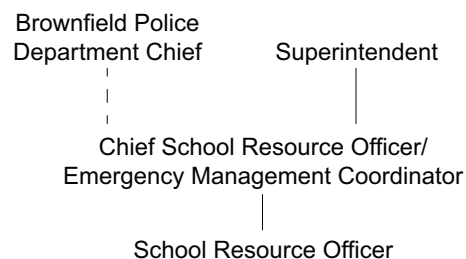
NOTE: Brownfield ISD school resource officers are commissioned by the Brownfield Police Department and employed by the district.
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

enforcement, and recovery. Risks can include environmental disasters, physical hazards, security threats, emergencies, and human-caused crises.

Managing safety and security initiatives is dependent on a district's organizational structure. Larger districts typically have staff dedicated to safety and security, and smaller districts assign staff tasks as a secondary assignment. Safety and security include ensuring the physical security of a campus and its occupants. A comprehensive approach to planning for physical security considers locking systems; monitoring systems; equipment and asset protection; visibility of areas and grounds; police and school resource officers; and emergency operations. Emergency and disaster-related procedures must include fire protection, environmental disasters, communication systems, crisis management, and contingency planning. To identify physical hazards, a school district must consider playground safety and overall building and grounds safety. Environmental factors, such as indoor air quality, mold, asbestos, water management, and waste management, also affect the safety of school district facilities.

One of the stated objectives of public education in the Texas Education Code is for campuses to "maintain a safe and disciplined environment conducive to student 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 safe and secure school environment as defined by the U.S. Department of Education, Title IV, Section 401, 21st Century Schools and the Safe and Drug-free Schools and Communities Act, encompasses communication systems, fire protection, playground safety, facility safety, environmental regulations, and emergency operation planning.

The Brownfield ISD school resource officers (SRO) are stationed at designated campuses and use district vehicles to travel to other district campuses and facilities as needed. One SRO works primarily at the high school campus, and the chief SRO works at the middle school campus and is the district's emergency management coordinator (EMC). Brownfield ISD has a camera surveillance system, which was upgraded during school year 2018–19 to include new cameras for campuses and auxiliary facilities, and remote access capabilities. Additional security improvements include the installation of a keyless access card system at select entrances throughout district facilities. Principals oversee security at their respective campuses by doing walkthroughs and monitoring the camera feeds.

DETAILED FINDINGS

SAFETY AND SECURITY COMMITTEE (REC. 41)

Brownfield ISD does not have a safety and security committee as required by the Texas Education Code.

The Texas Education Code, Section 37.109, requires each Texas school district to maintain an active safety and security committee (SSC) that meets at least three times per calendar year. SSC responsibilities include providing recommendations to the Brownfield ISD Board of Trustees (board) and administrators on updating the multihazard emergency operations plan (EOP), aiding the district in developing and implementing emergency plans consistent with the district's EOP, working with local law enforcement to increase police presence within the district, and reviewing reports that are submitted to the Texas School Safety Center, such as the mandated safety and security audit. Section 37.109 identifies district staff and community representatives that should be members of the SSC. The SSC statutory requirements also are stated in Brownfield ISD's Board Policy CK (LEGAL).

The superintendent said that the district leadership committee functions as the district's SSC, whose meetings include discussions of safety and security concerns along with other district topics, such as curriculum, technology, and daily activities. During leadership committee meetings, district staff planned the districtwide evacuation drill and security upgrades, including the installation of additional cameras and a keyless access card system. **Figure 8–2** shows a comparison between the Texas Education Code's required SSC members and Brownfield ISD's leadership committee members.

District staff did not provide documentation of a previous SSC to the Legislative Budget Board's School Performance Review Team, such as meeting agendas and meeting minutes. The review team visited the district in December 2019.

Substituting the SSC with the leadership committee limits the feedback on safety and security concerns from other district and nondistrict staff. For example, during a teacher focus group, staff discussed safety concerns witnessed during a lockdown drill. However, the principal was not aware of teachers' safety concerns regarding the drill. A county official confirmed to the review team that the district had not invited county officials to district meetings to discuss joint safety and security efforts. A committee that does not include city and county officials limits its coordination efforts during an emergency.

Other staff expressed the need to patrol certain areas near the high school because students are known to gather there during school hours. One of the SSC's responsibilities is to help the district evaluate the need for more police presence within the district and collaborate with the local police department, in this case the Brownfield Police Department, to address safety concerns.

An SSC also is responsible for providing feedback to district staff and the board regarding its EOP and aiding staff and trustees in addressing safety and security issues that affect the district. Without meeting documentation, it is not possible to confirm that the EOP was reviewed by an SSC. At the time of the review team's onsite visit, the most recent EOP was an incomplete draft from school year 2018–19. Furthermore, an SSC supports a district in completing and reviewing its safety and security audit pursuant to the Texas Education Code, Sections 37.108(b) and 37.108(c). At least every three years, each school district is required to conduct a safety and security district audit report (DAR) of its facilities and submit the results to its board of trustees and the Texas School Safety Center (TxSSC). TxSSC is a research center at Texas State

FIGURE 8–2
STATUTORILY REQUIRED SAFETY AND SECURITY COMMITTEE MEMBERS COMPARED TO BROWNFIELD ISD'S LEADERSHIP COMMITTEE MEMBERS
SCHOOL YEAR 2019–20

STATUTORILY REQUIRED SAFETY AND SECURITY COMMITTEE MEMBERS (1)	BROWNFIELD ISD'S LEADERSHIP COMMITTEE MEMBERS	REQUIRED MEMBERS NOT PRESENT FOR SAFETY AND SECURITY COMMITTEE
• the district's superintendent; • the district's board 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 a county or city where the district resides; • 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	• superintendent; • assistant superintendent; • chief financial officer/human resources director; • superintendent's secretary; • technology director; • maintenance and transportation director; • director of special education; • chief school resource officer/emergency management coordinator (2); • six Brownfield ISD campus principals; • two assistant principals; and • three principal fellows	• district's board president; • a second member of the district's board; • one or more representatives of the local police department or sheriff's office; • one or more representatives of an office of emergency management of a county or city where the district resides; • 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

NOTES:
(1) Required pursuant to the Texas Education Code, Section 37.109(a-1).
(2) Brownfield ISD does not have a police department; its school resource officers are commissioned by the Brownfield Police Department (PD) but are district employees and do not participate in law enforcement efforts with Brownfield PD outside of district duties.
SOURCES: Legislative Budget Board School Performance Review Team; the Texas Education Code, Section 37.109(a-1); Brownfield ISD, December 2019.

University that provides research, training, and technical assistance regarding safety and security for kindergarten to grade 12 schools. The TxSSC website also provides districts with guidelines for forming and maintaining an effective SSC. Brownfield ISD last conducted a DAR for school year 2016–17. The district's next DAR, for school year 2019–20, is due in September 2020.

By not maintaining an active SSC, Brownfield ISD is in violation of state law. Additionally, without an active SSC including members from different agencies and job positions, the district is depriving itself of the broad safety and security knowledge these representatives could offer. Appointing SSC members from external organizations would help the district build community partnerships that could support the district during a crisis, and could help the district in completing and submitting key safety and security documents to the board or appropriate state entities.

Cuero ISD has a page on its website for its SSC that includes current membership, meeting dates and times, and a summary of committee responsibilities. The SSC has a diverse membership, as required by the Texas Education Code, Section 37.109(a–1), which includes administrative district staff, campus leadership, board members, parents, a teacher, and three representatives from external organizations, including the Cuero Police Department, the Texas Department of Public Safety, and DeWitt County Emergency Management. The district posts the meeting agendas to inform the public of topics that will be discussed and to provide the opportunity for community representatives to voice safety and security concerns.

Brownfield ISD should form a safety and security committee to formalize safety and security processes in the district.

The superintendent should appoint appropriate district staff to the SSC and coordinate with the board on the roles of the board president and a second board member for the SSC. The superintendent should identify parents that could serve on the SSC and coordinate with city, county, and emergency management officials regarding the proposed committee.

The superintendent should administer the SSC responsibilities to maintain a current roster of committee members, schedule meetings, develop meeting agendas, post meeting dates to the district website, and keep a record of meeting minutes.

The SSC should review the district's EOP annually and present its recommendations to the board, and work with the EMC to develop and implement new emergency procedures as needed. The SSC also should coordinate with

local law enforcement to address district concerns, and review the DAR and ensure its accuracy before it is submitted to the TxSSC.

The district could implement this recommendation with existing resources.

MULTIHAZARD EMERGENCY OPERATIONS PLAN (REC. 42)

Brownfield ISD does not have a current multihazard emergency operations plan and lacks a process to monitor and implement emergency operations procedures in a concerted manner.

The purpose of an EOP is to address prevention, mitigation, preparedness, response, and recovery. Brownfield ISD's most recent EOP is an incomplete draft from school year 2018–19. The EOP does not have action plans for events such as runaway students, student abduction and kidnapping, active shooter, student safety in portable buildings, or continuity of operations. It also does not include a security policy, pursuant to the Texas Education Code, Section 37.108(e), for school district property selected for use as a polling place. The district's EOP identifies staff that no longer work for the district, and not all of the agreements with external organizations include the required information, such as type of partnership and effective date. The EOP has incomplete appendix citations and missing annexes, and it is not signed by the superintendent, campus principals, or the EMC.

The chief SRO serves as the district EMC and maintains the EOP. During interviews, however, other district staff also reported having EMC responsibilities, including updating the EOP. Several staff said that the district has not been consistent with maintaining written plans and procedures. Other staff reported not being aware that the district had an EOP. The chief SRO said that staff turnover is a barrier to updating the EOP because incoming staff need to be trained on the emergency procedures.

During interviews, staff said that the district does not conduct drills consistently at each campus. For example, at the high school, staff reported that the campus did not participate in a lockdown drill during school year 2018–19 and had not participated in one for school year 2019–20 at the time of the review team's onsite visit. The district most consistently performs fire exit evacuation drills, but this practice also varies by campus. The EOP states that drills must be performed regularly. School districts are required to participate in no more than eight emergency drills per semester, including fire exit evacuation, lockdown, lockout,

shelter-in-place, and non-fire evacuation drills. According to the EOP, drills must be documented and reviewed and, when necessary, a corrective action plan should be developed and shared with staff. Brownfield ISD's EMC oversees that principals conduct the required drills.

Staff said that during a small roof fire in the Brownfield ISD Administration Building/Brownfield Education Center/ Disciplinary Alternative Education Program (DAEP), multiple staff checked the building to ensure that students were evacuated instead of exiting the building immediately. Although it is admirable that staff prioritized student safety, the district's lack of current emergency procedures deprived staff and students of guidance for how to evacuate the building properly in the manner most likely to limit harm.

Campus principals are responsible for maintaining drill logs for up to three years, but logs provided by the district show that principals do not maintain logs consistently. Additionally, not all drill logs maintained by the district are completed, and several lack an after-action review or corrective action plan. For example, staff expressed concerns about the high school's designated reunification site during a fire exit evacuation drill. The reunification site is located near butane tanks, which could be a hazardous location during a fire. This concern is not addressed in the drill logs provided by the district. Additionally, the drill logs provided to the review team by the district did not include those for students in the Brownfield Education Center or the DAEP.

Brownfield ISD's EOP identifies the importance of a continuity of operations plan (COOP), but it does not include procedures to follow for COOP. The EOP defines COOP as "program guidance to continue school district business, including instruction and other essential functions in the event of a disruption initiated by natural, human or technological impacts causing the loss of facilities, technology or the workforce." District staff said that the district has built positive relationships with external organizations since the superintendent's April 2018 employment, but these relationships are not secured through formal agreements. The assistant superintendent said that the district has not reviewed its memorandums of understanding (MOU) with external organizations, and the district was unable to provide copies of MOUs regarding COOP. The chief financial officer (CFO) said that the district does not have funding allocated to COOP. An emergency may require coordination with the Department of State Health Services, local emergency management agencies, law enforcement, local health

departments, or fire departments. Without an MOU or other formal written agreement, the district may struggle to maintain support from external organizations if staff members instrumental in building these relationships leave the district. An MOU also delineates district costs and use of specific resources for COOP.

Although the superintendent acknowledged that written procedures in the EOP are not current, he said that the district participates in safety and security efforts such as drills to enhance preparedness for emergencies. For example, in March 2019, Brownfield ISD conducted a districtwide evacuation and reunification drill, although it is not required by the Texas Education Code. All campuses were evacuated, and students and staff were bused to a reunification site. The Brownfield Police Department and the Texas Department of Public Safety also participated in the drill. The superintendent said that the drill enabled district staff to evaluate the evacuation and reunification procedures and address any issues that emerged. Although some staff reported attending an after-action review meeting to discuss the drill's successes and shortcomings, other staff said that they had not seen a corrective action plan from the drill. Brownfield ISD leadership said they planned to conduct a second districtwide drill during spring 2020.

By not having a current EOP, Brownfield ISD is not in compliance with the Texas Education Code, Section 37.108, and the district may not be prepared fully for an emergency or for how it would conduct COOP procedures. Participating in drills and certifying proper evaluation and documentation enhances the district's emergency preparedness and reduces the chance of harm from such an event.

An effective school district reviews its EOP annually with support from the EMC, district staff, and community representatives to ensure that it is updated and contains all the legally required components. Forney ISD has a current, detailed EOP that includes procedures for visitors and emergency school bus evacuation, and emergency planning preparedness for individuals with special needs. It also lists the different types of drills, how often they should occur, and examples that pertain to each drill type. TxSSC's website provides districts with a high-quality EOP toolkit, including a template to guide district staff through the process of developing, reviewing, and updating an EOP in a manner consistent with current standards and best practices. The toolkit specifies important items to include in an EOP, such as threat and hazard identification and risk assessment, an EOP distribution plan, and resource coordination.

Brownfield ISD should implement and update the district's multihazard emergency operations plan.

The superintendent should determine which staff will be responsible for updating the EOP and require them to collaborate with the SSC to review the plan annually and ensure that it includes the following elements:

- emergency responsibilities by staff position;
- procedures for managing threats or events affecting the district;
- procedures to evaluate staff on following emergency drills and procedures;
- current list of MOUs for COOP; and
- the legally required components pursuant to the Texas Education Code, Section 37.108.

The district could implement this recommendation with existing resources.

BUILDING SAFETY AND SECURITY (REC. 43)

Brownfield ISD has inconsistent procedures and limited safety equipment to address campus security.

The Brownfield ISD superintendent has initiated several security upgrades since starting in the position during school year 2018–19. Security upgrades include new camera installations, a keyless access card system for select doors, and camera doorbells. Before school year 2018–19, the chief SRO installed security cameras, but the district since has hired a security firm to install the new security upgrades.

At the time of the review team's onsite visit, most of the new cameras were functional, and campus leadership could view the camera feed from laptop computer and mobile phone interfaces. However, staff report that two cameras at one of the campuses are not functioning, and staff could not view the camera feed. Although the district had contacted the company that installed the cameras to fix the issue, it had not been resolved. The cameras are motion-activated and have a fixed position. According to staff, camera recordings are stored for a specified period. However, staff reported different time frames for how long the recordings are kept. The cameras are not used as a preventive measure but as a way to identify a suspect of misconduct after an event takes place. For example, at Colonial Heights Elementary School staff said that they learned that students vandalized a storage container on campus grounds only after camera footage

revealed that the incident had occurred. The external cameras do not alert administrators if an intruder is on campus grounds. The review team also identified several camera blind spots at two of the campuses.

Many of Brownfield ISD's campus buildings are outdated, and some lack standard security features, such as a fire alarm or a working public address (PA) system. Campuses without a fire alarm use the PA system and the class transition bell to conduct fire drills. However, the PA system's quality varies by campus. For example, during a teacher focus group, staff said that instructions delivered over the PA system during a lockdown event were so audibly distorted that some teachers heard "lockout," instead of "lockdown." As a result, some teachers released their students into the hallways to attend their next class instead of keeping them inside the classrooms. During a lockout students are brought into the building and external doors are locked but regular classroom instruction continues. During a lockdown students and staff are instructed to shelter in place, lock classroom doors, and remain out of sight. Staff also reported other problems with campus PA systems, including that the PA system is not audible in all the classrooms or on the campus grounds and can be difficult to hear in the hallways during class transition.

All campuses have camera doorbells at the entrances. When a visitor rings the doorbell, a campus administrator will ask the reason for the visit and either buzz the visitor in or call a campus principal or an SRO for assistance. The Bright Beginnings Academic Center is the only campus that contains a security vestibule, which is a waiting area where campus staff can check in visitors and verify their identities using the district's visitor management system before admitting them on campus. At other campuses, according to staff, visitors are not led directly to the main office, which provides them access to the whole campus before being required to sign in. If visitors do not arrive at the office to check in, campus staff will search for them and escort them to the office. The superintendent said that the district would use any remaining funds from the 2019 bond package to build security vestibules for the campuses. Brownfield ISD voters approved a $40.0 million bond package during May 2019.

During interviews, several staff stressed the importance of keeping external doors locked, adding that the practice of propping open doors is an ongoing issue that not all staff take seriously. The review team's onsite observation of the high school noted that certain campus staff were in the habit of using a rug to prop open a door, through which the review

team entered the building and was not questioned by staff when inside. Additionally, campus support staff permitted entry to the review team through the cafeteria entrance instead of directing them to the main entrance. Staff said that students also have opened external doors for nondistrict staff to enter the building. At another campus, the review team observed a door propped open by a brick to enable students to pass freely between the main building and the gymnasium.

To increase building security, the district added a keyless access card system whereby staff enter a building by scanning their district identification badges instead of using keys. Staff report lost badges to the Technology Department for deactivation. The keyless access card system is located only at select campus entrances, and standard keys are used to access the remaining entrances. Staff said that the CFO, technology director, SROs, and director of maintenance and transportation receive an email alert when a door with the keyless access card system is left open. According to the chief SRO, the company that installed the access card system did not finish the keyless access card system installation that alerts staff to a propped open door. At the time of the onsite visit, district staff did not receive alerts when a door was left open.

Brownfield ISD principals have master keys that can be used to access any campus, and maintenance staff have master keys to their campus buildings. The director of maintenance and transportation said that the district does not document which staff have been issued keys, and it is possible that other staff have keys that could access a campus building. During calendar year 2015, the director of maintenance and transportation performed a key sweep at Brownfield High School and removed outdoor keys from staff whose job responsibilities did not require them. However, without documentation of issued keys, it is not possible to determine if all outdoor keys were removed.

Inadequate safety measures at campus facilities result in a discontinuity in safety and security that could be exploited. Without crucial safety upgrades and staff and student safety training, Brownfield ISD is vulnerable to intruders entering campus facilities. Additionally, buildings that do not have fire alarms and functioning PA systems place staff and students at risk because they are not alerted properly to an ongoing threat.

National School Safety and Security Services is an established safety and security consulting firm that specializes in school safety. Its online publication, *School Access and Visitor Control*,

offers practical steps to help districts deter access to campus facilities from individuals who are not students or district staff. It also helps districts manage visitors when they are on campus.

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* provides best practices for improving many aspects of school physical safety and security regarding parking lots, building perimeters, classrooms, the PA system, and other school features.

Brownfield ISD should evaluate district facilities to assess the need for additional safety upgrades.

The superintendent should collaborate with the EMC to evaluate the need for additional external cameras, including rotating cameras and motion-activated cameras that can alert staff when they are activated. Until the district adds campus security vestibules, the superintendent should charge the EMC with developing consistent visitor procedures to ensure that campus staff greet visitors when they enter the facilities and that visitors do not have access to the building without being cleared by the visitor management system. The superintendent should require the EMC to perform the following tasks:

- develop and administer training for staff and students on the importance of not permitting nondistrict staff into campus facilities, and to inform staff of the risks of leaving doors propped open;

- coordinate with the security firm that installed the cameras and keyless access card system to complete the following tasks:

  ◦ ensure all cameras are functioning properly; and

  ◦ complete the installation process that will enable staff to receive alerts when a door is propped open; and

- collaborate with the SSC to evaluate the following additional safety installations:

  ◦ upgrading or installing a PA system at the necessary campuses;

  ◦ installing a fire alarm system at the necessary campuses; and

  ◦ upgrading the keyless access card system to include a number entry pad as a secondary safety measure with the access card to increase campus safety.

The director of maintenance and transportation should collaborate with campus principals to document formally which staff have which keys, and should collaborate with human resources staff to develop a process to ensure that all keys are collected from individuals before they leave the district's employment. The superintendent and the EMC should assess the cost of expanding the district's keyless access card system to all campus entrances.

No fiscal impact is assumed regarding additional safety upgrades until district staff have assessed and recommended to the superintendent those that best would fit the district's needs.

STAFF TRAINING (REC. 44)

Brownfield ISD does not have a process to evaluate and develop crisis training for staff.

Brownfield ISD provides annual staff trainings, including suicide prevention, active shooter, crisis management, diffusing a situation, and Stop the Bleed, a course on recognizing and treating life-threatening injuries until help arrives. Staff participate in trainings at the beginning of each school year.

Many staff reported that, although the safety training they receive is informative, they do not receive sufficient emergency preparedness training. Staff said that the district has not provided a midyear refresher course on all trainings to help reinforce the training material, particularly suicide prevention since student suicide and attempts were reported during school years 2017–18 and 2018–19.

Although the district provides training, campus staff report classroom situations for which they are not prepared. For example, staff do not have procedures for contacting appropriate staff and ensuring the safety of other students in scenarios such as aggressive parental behavior or for students throwing items, running out of the building, or bringing weapons to campus.

If staff do not feel prepared to respond to an emergency, it can affect their response time and cause undue harm to staff and students. Furthermore, leaving too much time between trainings prevents staff from recalling procedures more accurately.

The TxSSC website provides a toolkit focused on training, drilling, and exercising to prepare districts to address a range of emergencies or crisis events. The toolkit intends to help prepare staff and improve their

performance during an emergency. The website also provides districts with a guide to developing their own emergency exercises that are unique to their goals and can be based on past occurrences in the district.

Brownfield ISD should survey staff to identify training that would support emergency preparedness.

The assistant superintendent should collaborate with the EMC to develop a survey for staff to identify lacking areas in emergency preparedness. The EMC should coordinate with the Technology Department to place the survey on the district website. Based on survey responses, the EMC should collaborate with the district leadership committee and SSC to develop or identify trainings that would assist district staff to be prepared to respond to various emergencies.

No fiscal impact is assumed until the assistant superintendent and EMC complete the assessment of staff training needs and decide which trainings to pursue.

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.

EMERGENCY COMMUNICATIONS

Brownfield ISD uses the CrisisGo software application to inform staff of a drill and to alert them during an emergency. The application is accessible to staff on their laptop computers and mobile devices. Many staff reported functionality issues with the application, from outdated classroom rosters to the application requiring installation updates when staff need to use it. According to staff, it is the responsibility of the technology director and the SROs to ensure that the information in the application is current. Additionally, the district has not communicated to all staff that the application should be accessed regularly to maintain its current functionality. The technology director and chief SRO should develop procedures to ensure that the application is functional and current and to communicate updating procedures to staff. The district also should develop an auxiliary plan to communicate with staff during an emergency if the application does not function properly or if no Internet connection is available.

SCHOOL RESOURCE OFFICERS

Brownfield ISD campus staff do not have a well-defined understanding of the role and responsibilities of an SRO. Staff reported that the SRO receives calls to assist in classroom management issues, such as students refusing to turn in their mobile phones, which are not SRO responsibilities. The SRO job description charges the SRO with protecting students, staff, and visitors from physical harm; preventing property loss due to theft or vandalism; and enforcing local and state laws. When SRO expectations are not clear, it results in confusion regarding the role of the SRO and may result in staff feeling unsupported if the SRO is unable to assist. The superintendent should ensure that staff know the role and responsibilities of the SROs.

FISCAL IMPACT

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

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

9. TRANSPORTATION MANAGEMENT AND FLEET OPERATIONS

Brownfield Independent School District's (ISD) 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 the purchasing, maintenance, and repair of school buses and general service vehicles.

The district operates 11 regular routes, which include nine regular education routes and two special services routes, and maintains a fleet of 17 school buses. During school year 2018–19, the district reported to the Texas Education Agency transporting approximately 349 students daily out of 1,725 enrolled, or 20.0 percent.

The fleet maintenance facility is located between the Brownfield ISD administrative building and the high school campus. The facility has a fuel point dispensing diesel and regular unleaded fuel. All transportation staff are officed at the fleet maintenance facility. **Figure 9–1** shows the structure of Brownfield ISD's Transportation Department.

ACCOMPLISHMENT

♦ Brownfield ISD has transitioned successfully from a contractor-managed transportation program to a district-managed transportation program, resulting in improvements in stakeholder satisfaction and possible cost savings.

FINDINGS

♦ Brownfield ISD lacks a comprehensive bus replacement plan.

♦ Brownfield ISD does not assess its bus routes regularly for efficiency improvements and lacks a process to determine the proper fleet size and types of vehicles to best serve the district.

♦ Brownfield ISD has insufficient vehicle mechanic staffing for its fleet size and does not have any substitute drivers.

RECOMMENDATIONS

♦ **Recommendation 45: Analyze the district's fleet operations and adopt a bus replacement plan.**

FIGURE 9–1
BROWNFIELD ISD TRANSPORTATION DEPARTMENT
DECEMBER 2019
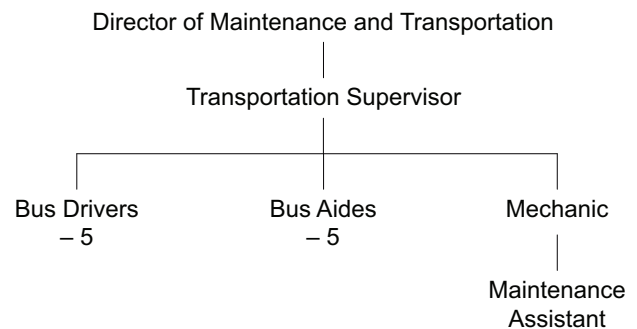
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

♦ **Recommendation 46: Review the district's bus routing process to optimize its fleet.**

♦ **Recommendation 47: Evaluate the Transportation Department's staffing needs and ensure that new staff receive training.**

BACKGROUND

An independent school district's transportation function transports students to and from school and other school-related activities. This function is regulated by federal and state laws related to funding, vehicle type, driver education, and safety issues. Districts implement these regulations, budget and allocate resources, and establish operational procedures for bell schedules, bus routes, and transportation fleet maintenance.

Managing transportation operations is dependent on the organizational structure of the district. Districts either may contract for or self-manage their transportation operations. Using a contracted management model, districts rely on the company to provide supervision of transportation operations. In this arrangement, a district may rely on the company to provide all or some staff, or it may use district staff for its operations. Using the self-management model, a district manages transportation functions without assistance from an outside entity. Managing transportation operations requires planning; state reporting and funding; training and safety; and vehicle maintenance and procurement. Primary

transportation expenditures include capital investments in vehicle fleets and annual costs of maintenance and operations. State transportation funding for each school district is determined by a formula that includes the number and type of students transported. Each district annually submits transportation reports containing these data to the Texas Education Agency for this purpose.

Brownfield ISD contracted for district transportation operations from school years 1998–99 to 2015–16. During the final three years of contracted operation, the district's costs for transportation ranged from $563,000 to $670,000 per year. The district decided to eliminate the contract as of the end of school year 2015–16 and developed an in-house transportation operation to improve service levels, upgrade the fleet, and reduce costs.

The Legislative Budget Board's School Performance Review Team visited the district during December 2019 and conducted several focus group and individual interviews.

DETAILED ACCOMPLISHMENT

MANAGEMENT OF TRANSPORTATION PROGRAM

Brownfield ISD has transitioned successfully from a contractor-managed transportation program to a district-managed transportation program, resulting in improvements in stakeholder satisfaction and possible cost savings.

This initiative has resulted in the following benefits for the district:

- bus ridership has increased 38.0 percent, from 253 students transported daily during school year 2017–18 to 349 students transported daily during school year 2018–19;

- the facilities maintenance and transportation director projects a decrease in annual operating costs ranging from $300,000 to $500,000; these projected savings have not been realized yet because the district is transitioning the maintenance and updating of its fleet and operations;

- according to a focus group of bus drivers, district parents report increased satisfaction with the level of service and feel that their students are in a safe and caring environment; overall satisfaction with the change from contracted transportation services was reinforced by feedback from campus principals during a focus group; and

- during the onsite visit, the review team confirmed through ride along observations that the self-managed transportation operation provides a safe environment for Brownfield ISD students.

DETAILED FINDINGS

BUS REPLACEMENT PLAN (REC. 45)

Brownfield ISD lacks a comprehensive bus replacement plan.

Before school year 2016–17, Brownfield ISD contracted the transportation operations. During this time, the district had no plan for replacing its aging fleet. During onsite interviews, staff noted that both the facility and equipment had sustained a large amount of use during the contracting period. In school year 2016–17, the district began rebuilding its fleet through a series of three-year lease–purchase agreements of buses. During onsite interviews, the director of maintenance and transportation said that the useful life of a route bus at the district is 12.0 years. When assigned to a route, Brownfield ISD buses average from 10,000 miles to 12,000 miles per year.

Figure 9–2 shows that the district had 17 route buses as of December 2019, with an average age of 8.3 years and an average of about 78,000 miles per vehicle.

Figure 9–3 shows the inventory of active route buses for Brownfield ISD by model year. The district's fleet has an uneven spread of model years, which indicates the lack of an effective replacement plan.

School buses are a large capital expense. 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. As explained in one of its white papers, the National Association of State Directors for Pupil Transportation Services, a membership organization of leaders in school bus transportation, argues for the timely replacement of school buses through a planned process. The association further 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.

The Texas School for the Deaf (TSD) follows a model bus replacement plan through which one-third of its fleet is

replaced every five years. This frequency places the fleet on a replacement plan of 12.0 years to 15.0 year, which conforms to industry standards. The average accumulated mileage for TSD's bus fleet is 218,067, and the average annual mileage per unit is 14,538. Based on industry standards, TSD's bus fleet would average 14.0 years for replacement, or 203,532 miles.

Brownfield ISD should analyze the district's fleet operations and adopt a bus replacement plan.

To establish a replacement plan, the district should carry out 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; and

- establish the average number of miles per year each route bus is projected to accumulate, including field trip mileage.

Long-term planning enables the district to keep the fleet in its useful period of service, thus minimizing maintenance expenses, fleet size, and overall operating expenses. Additionally, this practice enables stable long-term budget planning.

No fiscal impact is assumed for this recommendation. The short-term and long-term impacts of this recommendation cannot be determined until the district

FIGURE 9–2
BROWNFIELD ISD ACTIVE INVENTORY OF ROUTE BUSES DECEMBER 2019

UNIT	MODEL YEAR	AGE (IN YEARS)	MILEAGE
105	1998	21	174,900
106	1998	21	84,596
107	2004	15	132,595
108	2006	13	86,446
109	2006	13	85,984
110	2006	13	86,044
111	2008	11	123,994
112	2009	10	117,780
113	2009	10	133,277
114	2010	9	101,472
115	2018	1	55,214
116	2018	1	55,450
117	2018	1	35,962
118	2017	2	47,454
119	2021	Less than 1	2,201
120	2021	Less than 1	2,311
121	2021	Less than 1	2,316
Average	**2011**	**8.3**	**78,117**

SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD bus fleet inventory, December 2019.

develops its bus replacement plan and performs an analysis of associated costs based on the life cycles of the buses in the fleet.

FIGURE 9–3
BROWNFIELD ISD ACTIVE ROUTE BUSES BY MODEL YEAR, DECEMBER 2019
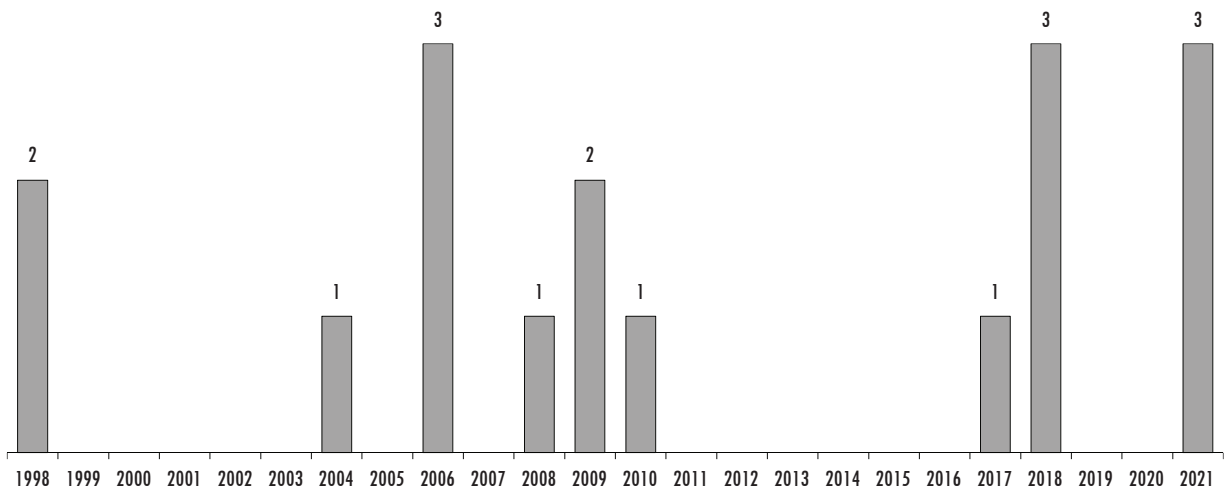
SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD bus fleet inventory, December 2019.

BUS ROUTE ASSESSMENT AND FLEET SIZE (REC. 46)

Brownfield ISD does not assess its bus routes regularly for efficiency improvements and lacks a process to determine the proper fleet size and types of vehicles to best serve the district.

To cover its 546.0 square miles, Brownfield ISD operates nine regular education routes and two special education routes on a one-tier system. Brownfield ISD has established a two-mile walk zone around each campus, except for areas in which the surrounding two-mile radius is deemed too hazardous for students to walk safely to school.

According to the Brownfield ISD transportation supervisor, the routes have remained relatively unchanged since school year 1998–99. Minor changes were made in response to changes in student enrollment, but the district has not reviewed the route system overall due to a lack of resources. Any routing updates or changes are performed manually.

Brownfield ISD students typically are transported from home to school and back, with few group or neighborhood stops. Additionally, the district does not set definitive bus stop times. As a result, students typically wait indoors until they see the bus, which causes buses to stand longer than if students were waiting at the stop, ready to board. Upon arrival at the campus, a bus often will wait up to five minutes for a school administrator to accept the passengers before unloading because the campuses do not have established arrival times. Having more stops than necessary and waiting at each stop and the bus drop adds minutes to the current bus routes.

During interviews, the director of maintenance and transportation and the transportation supervisor reported the lack of an efficient bus routing system. The district's outdated, manual routing system cannot be connected to the district's student management system, which increases the risk of inconsistent transportation reporting to the Texas Education Agency (TEA).

The transportation supervisor said that Brownfield ISD typically transports 125 students to 130 students in the morning, and up to 140 students in the afternoon, on the nine regular education routes. This number is an average of 15.6 passengers per bus. The director of maintenance and transportation reported an average ranging from 10 students to 14 students on the two morning and afternoon special education routes. Information gathered from the bus driver focus group shows a total ridership of 86 students for Routes 1, 7, 10, and 12, an average of 21.5 passengers per bus. The average one-way daily ridership reported to TEA for school

year 2018–19 was 169, or 18.8 riders per bus. Using any of these three estimates and assuming an effective capacity of 54 students per bus, Brownfield ISD is operating its regular education routes at less than 50.0 percent capacity.

Combined with the low number of passengers, the review team observed Brownfield ISD routes to be fairly short, even with numerous door stops and delays in bus stop and school drop procedures. Morning buses leave the bus yard at 6:15 AM and deliver students to campuses between 7:20 AM and 7:30 AM. Afternoon buses pick students up from campuses between 3:10 PM and 3:15 PM and return to the bus yard between 4:30 PM and 5:15 PM. The transportation supervisor estimated, and onsite observations supported, average morning and afternoon ride times for students of 30.0 minutes, and the longest student ride time was approximately 45.0 minutes.

At a maximum of 54 riders per regular route bus, the current nine buses have a total capacity of 486 riders. However, school districts typically do not plan to fill every bus to capacity, because that would leave no room for new students during the course of the school year, nor is 100.0 percent capacity practical on a daily basis. Instead, 80.0 percent bus utilization is considered a departmental planning goal. At 80.0 percent capacity, the nine Brownfield ISD buses should carry 389 riders. The district's heaviest normal passenger load is 140 students during afternoon transit, which would increase at most to 194 students, based on the review team's sample observation, if all nine routes were as busy as the four with the greatest ridership (9 buses x 21.5 students per bus). According to these data, Brownfield ISD has an excess capacity ranging from 195 seats to 249 seats, or 4.5 buses to 5.8 buses.

Brownfield ISD has 17 buses in its current inventory, not considering four buses awaiting disposal by auction. Nine buses are allocated for regular routes, two are allocated for special education routes, and six are available for use as spares. This allocation provides the district with a spare ratio of 35.3 percent. When it is not in use, a spare bus has insurance, inspection, maintenance, and storage costs. District leaders did not explain the reason for the current number of spare buses.

Brownfield ISD has four full-sized charter buses and one mini charter bus, which are used for field trips and athletic trips. The spare route buses also are available for these trips when they are not needed for routes. According to the director of maintenance and transportation, each charter bus averages 10,000 miles annually.

The district could utilize two charter bus companies operating in Lubbock during periods of increased field trips. Typically, two route buses or as many as eight vehicles (e.g., mowers, trailers, and other unpowered vehicles), referred to as white fleet vehicles, may be acquired with the same capital outlay required to purchase one charter bus.

The Council of the Great City Schools is a coalition of public school systems that promotes best practices. Its 2019 Key Performance Indicator and Benchmarking report recommends maintaining a spare bus ratio of 18.0 percent as a factor in establishing a district's desired fleet size, age, and bus utilization. The National Association of State Directors of Pupil Transportation supports an industry standard spare bus ratio ranging from 10.0 percent to 15.0 percent.

Until school year 2019–20, state funding for transportation in Texas was determined through the linear density system. This system is the ratio of the average number of regular education students transported daily to the number of miles traveled daily for those students. Beginning in school year 2019–20, districts still must report linear density to TEA, but funding is based on mileage. For school year 2019–20, the funding is $1.00 per mile. With a reported per mile cost of $4.92 for school year 2017–18, even with substantial efficiency improvements from self-managing the transportation operations, Brownfield ISD is unlikely to recoup all transportation costs from state funding.

In addition, bus routes affect the overall spending for a district's transportation operations because routes help to establish the number of driver positions, staff levels for vehicle maintenance, new bus purchases, and other office staff. Effective districts adjust their bus routes and schedules annually based on student transitions between campuses. This process is difficult and extensive, and if it is not performed correctly, it can affect a district's transportation funding. The process is made more difficult when all the information needed to complete the process is performed manually, as it is at Brownfield ISD.

Proper management of a school district fleet requires review of all aspects of fleet operations, support operations capacity, staff training, district needs, fleet size, and fleet mix. Effective districts coordinate fleet size to district needs, and enrollment is a key factor.

Several districts have implemented automated routing systems successfully to reduce labor hours necessary for planning and to consolidate data needed to schedule efficient routes. Districts that use an automated bus routing and scheduling software system have been successful in decreasing the transportation operating costs by decreasing the number of bus routes required to serve students. This decrease in the number of routes decreases the number of required drivers, buses, and mechanics. Automated systems are available through various vendors. Automated bus routing and scheduling software systems help enable districts to perform the following tasks:

- manage bus routes, students and drivers;

- plan for various contingencies;

- generate reports;

- manage stop and route maps and students;

- manage redistricting issues; and

- develop routes with an integrated mapping system.

Many routing systems can be integrated with other district systems, such as the district's student information system.

Brownfield ISD should review the district's bus routing process to optimize its fleet.

To accomplish this process, the district should perform the following tasks:

- review bus routing to maximize capacity and minimize the number of route buses needed;

- evaluate bus routing software to aid the district in determining the optimal number of routes run daily. As part of this process, the district could consider staggering school start times to enable buses to make multiple runs;

- review the fleet size and vehicle types to determine the appropriate number of vehicles necessary to meet the district's transportation needs;

- determine the number of spare buses required for the district. When developing this number, keep in mind the staffing level and capacity of the bus maintenance operations and the district's practice of bus assignments to address nonroute transportation requirements;

- identify excess buses and dispose of excess buses by auction or other approved method;

- develop dispatch and planning procedures for use of spare and route buses for field trip duties;

- minimize door-to-door stops on routes; and

- develop student pickup requirements to load and unload students efficiently.

Several routing options offer monthly subscription options that could be effective for small school districts. One potential package offered as a monthly subscription with cloud-based servers for data storage costs $349 per month. For a 12-month subscription, the cost would be $4,188 annually ($349 per month x 12 months = $4,188).

Proper inventory and disposal from the bus fleet would result in a cost savings. Based on best practices, the district could eliminate two route buses and four spare buses. At a minimum, the retirement and disposal of these buses would result in auction income of approximately $21,000 (6 x $3,500 average auction revenue for one bus). The district also would avoid costs associated with unnecessary fuel and driver expenses, insurance, inspections, housing, and maintenance.

The fiscal impact assumes an annual cost of $4,188 for a bus routing system, and a onetime gain of $21,000 for the disposal of buses.

VEHICLE MAINTENANCE STAFFING (REC. 47)

Brownfield ISD has insufficient vehicle mechanic staffing for its fleet size and does not have any substitute drivers.

The transportation mechanical support staff consists of one mechanic, one entry-level maintenance assistant, and temporary volunteer labor. The director of maintenance and transportation manages the facility maintenance and operations and transportation functions in the district. The transportation supervisor handles the daily operations and oversees the transportation mechanical staff. The mechanic has 23.0 years of fleet experience. The maintenance assistant helps the mechanic with repairs and also serves as a bus driver and bus washer. Typically, the maintenance assistant drives a bus four hours per day, then assists in the shop during the remaining four hours. Temporary mechanical labor is provided by individuals that are, by court order, required to provide community service hours. In most cases, the court-ordered temporary staff have low levels of mechanical skill. The temporary staff work half-time, five hours per day, four days per week. Brownfield ISD has no guarantee that this practice will continue, nor of the quality of the temporary staff provided. Effectively, the district has one qualified mechanic to support the fleet, a challenge recognized by the director of maintenance and transportation and superintendent.

FIGURE 9–4
BROWNFIELD ISD WHITE FLEET AND OTHER VEHICLE INVENTORY
DECEMBER 2019

VEHICLE	ITEMS
Bobcat	1
Bucket truck	1
Car	5
Charter bus	4
Dump truck	1
Minibus	1
Pickup truck	9
Sport-utility vehicle	7
Tractor	4
Van	2
Total	**35**

SOURCES: Legislative Budget Board School Performance Review Team; Brownfield ISD bus routes, December 2019.

Currently, the district has no plan to recruit or develop qualified technicians. Competition from the petroleum industry has resulted in a shortage of skilled vehicle technicians in the Brownfield area. The district also has been unable to hire a substitute driver when the regular route drivers are unavailable. The director of maintenance and transportation and the transportation supervisor serve as substitute drivers because the district does not have any substitute drivers on call.

A substantial portion of the fleet is older, which results in higher maintenance demands. As of December 2019, the district had 17 route buses, with an average age of 8.3 years and an average of 78,000 vehicle miles.

In addition to the bus fleet, the Transportation Department manages and maintains the Brownfield ISD white fleet, which includes trailers, mowers, and construction equipment. **Figure 9–4** shows the district's white fleet inventory, which includes 35 motorized vehicles, plus trailers and other unpowered items of equipment.

The district's lack of skilled mechanical labor could result in the following consequences:

- the need to outsource maintenance support likely would be more expensive than hiring staff for this purpose;

- a fleet with excessive downtime due to lack of preventive maintenance or ineffective repair

could interfere with academic and extracurricular programming; and

- securing additional spare buses to compensate for excessive downtime within the fleet would result in additional expenses for insurance, inspections, and preventive maintenance.

Adequate mechanical support is critical to the functionality of school district fleet operations. The district's ability to transport students safely, on time, and in a manner that meets the community's expectations is impaired without sufficient and knowledgeable fleet mechanics. Industry benchmarks specify a ratio of one qualified technician for every 25 to 30 fleet vehicles. The variance in the range is affected by the current age of the fleet, operating environment, number of spare vehicles, availability of spare parts, physical capacity of the repair shop, and other factors.

Based on the current conditions, a ratio for Brownfield ISD of 25 vehicles per mechanic would be optimal. The district would need to hire two well-qualified fleet mechanics and one part-time assistant to achieve this ratio.

The Texas Association for Pupil Transportation (TAPT) is an organization of school transportation professionals that promotes Texas public schools' transportation safety and efficiency through the exchange of ideas and cooperation between districts' transportation departments. TAPT sponsors an extensive curriculum, including training and certifications in many aspects of school transportation, through regional chapters and at annual state conferences.

TAPT typically conducts training during the summer or on weekends. Its three-year to four-year training program has been successful for several school districts. In addition, candidates have the opportunity to achieve two certifications during TAPT's two-day regional conference. Most districts pay for transportation to the training, lodging, meals, and tuition, and the candidate donates the time as professional development.

Brownfield ISD should evaluate the Transportation Department's staffing needs and ensure that new staff receive training.

To implement this recommendation, the district should carry out the following tasks:

- develop and fill a second full-time mechanic position; the most qualified candidate would have some previous mechanical experience above entry-level

and good mechanical aptitude. The position initially could be split into part-time mechanic support and part-time substitute bus driver to fill the district's need for a designated substitute driver;

- enter the new mechanic into an on-the-job training (OJT) and TAPT technician training program, and assign the veteran mechanic to provide OJT oversight;

- enroll the new mechanic in a series of TAPT mechanic classes, as they become available;

- review the district's maintenance needs regarding the white motor coach fleet;

- determine the number of spare buses required for the district; when developing this number, consider the staffing level and capacity of the bus maintenance operations and the district's practice of bus assignments to address nonroute transportation requirements; and

- add a substitute bus driver position to cover routes when the regular route driver is unavailable.

The fiscal impact assumes an annual cost of $43,915. Based on the school year 2019–20 Brownfield ISD compensation manual, the starting salary for a mechanic in the district is $39,923. Based on Brownfield ISD's contribution percentage, the related benefit cost to the district is 10.0 percent of the salary, or $3,992. The total cost of adding the mechanic position would be $43,915 ($39,923 + $3,992).

No fiscal impact is assumed for the mechanic training because it is based on the experience of the staff filling the position. No fiscal impact is assumed for the substitute bus driver position as the new staff will fulfill the responsibilities of the position.

ADDITIONAL OBSERVATION

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

During the observation of the Transportation Department's bus barn, the review team noted that the parking lot was in various stages of disrepair and had large potholes located throughout. The district should consider developing a plan to repave the bus barn parking lot.

FISCAL IMPACT

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

The Legislative Budget Board's School Performance Review Team identified a fiscal impact for the following recommendations:

	RECOMMENDATIONS	2020–21	2021–22	2022–23	2023–24	2024–25	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
9. TRANSPORTATION MANAGEMENT AND FLEET OPERATIONS								
46.	Review the district's bus routing process to optimize its fleet.	($4,188)	($4,188)	($4,188)	($4,188)	($4,188)	($20,940)	$21,000
47.	Evaluate the Transportation Department's staffing needs and ensure that new staff receive training.	($43,915)	($43,915)	($43,915)	($43,915)	($43,915)	($219,575)	$0
Total		**($48,103)**	**($48,103)**	**($48,103)**	**($48,103)**	**($48,103)**	**($240,515)**	**$21,000**

10. COMMUNITY INVOLVEMENT

Brownfield Independent School District (ISD) has multiple departments whose responsibilities involve engaging the community. The district's main methods of communicating with stakeholders are through the district's social media, the local newspaper, and a local radio show. Brownfield ISD also uses its website intermittently to notify students and parents about district events. The superintendent represents the district at community-related events to inform the public about initiatives taking place at Brownfield ISD. **Figure 10–1** shows the Brownfield ISD organization for community involvement.

ACCOMPLISHMENT

♦ Brownfield ISD collaborates with a local community organization to provide backpacks containing food, snacks, and other items for students in need to take home every week through the Pak Pals program.

FINDINGS

♦ Brownfield ISD does not have a process to ensure that information on the district's website is current, detailed, and compliant with applicable laws and regulations.

♦ Brownfield ISD does not have a consistent plan for communicating effectively with the community.

♦ Brownfield ISD does not record parental involvement or community participation and does not recognize parent and community volunteers formally.

RECOMMENDATIONS

♦ **Recommendation 48: Establish procedures to ensure that information on the district website is current, detailed, and compliant with applicable laws and regulations.**

♦ **Recommendation 49: Develop an effective community outreach plan that promotes a common vision for the district, addresses the comprehensive needs of all stakeholders, and facilitates communication with community representatives in targeted, intentional, and coordinated ways.**

FIGURE 10–1
BROWNFIELD ISD COMMUNITY INVOLVEMENT ORGANIZATION
DECEMBER 2019
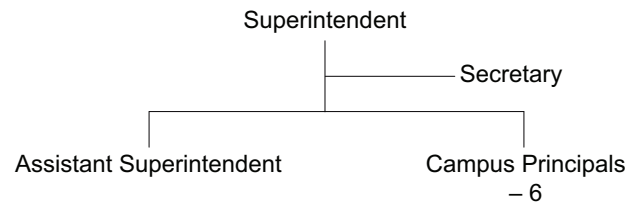
Superintendent
Secretary
Assistant Superintendent
Campus Principals – 6

Sources: Legislative Budget Board School Performance Review Team; Brownfield ISD, December 2019.

♦ **Recommendation 50: Develop a volunteer involvement program that includes written guidelines for campuses and volunteers, recruitment strategies, tracking activities, and a process to recognize participation.**

BACKGROUND

An independent school district's community involvement function requires communicating with stakeholders and engaging them in district decisions and operations. District stakeholders include students, staff, parents, residents, and businesses. Stakeholders must be aware of issues facing the district, support its priorities, and respond to its challenges. Communication tools include public meetings, campus-to-home communications, family and community engagement events, local media, the district's website, other technological tools, and social media.

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

Brownfield ISD covers six square miles in Brownfield within Terry County. During calendar year 2017, Brownfield had 9,740 residents. The demographics of the

city are 57.2 percent Hispanic, 36.1 percent non-Hispanic White, and 6.0 percent African American. The median household income for Brownfield during 2017 was $39,716 compared to the state median household income of $57,051. The average home value in the Brownfield area that year was $66,500.

Brownfield ISD's superintendent is the primary contact for community involvement. The superintendent, who joined the district in school year 2018–19, stated that his priorities have been to initiate the process of community engagement and to develop trust with parents and other community members. The superintendent has held various community events to involve students and parents with the district, such as a back-to-school dance party for students.

DETAILED ACCOMPLISHMENT

WEEKLY FOOD PROGRAM

Brownfield ISD collaborates with a local community organization to provide backpacks containing food, snacks, and other items for students in need to take home every week through the Pak Pals program. This program helps the community by addressing food insecurity at home in some school families.

Based on school year 2018–19 data, 80.8 percent of Brownfield ISD students are considered economically disadvantaged. The Pak Pals program provides more than 200 Brownfield ISD students with backpacks containing food and other items every week. Individual campuses coordinate with the program's coordinator. Community organizations collect donations, and district staff help pack and distribute the bags to students in need every Friday. The program does not require an application or qualification process, and any student who wants a backpack receives one.

DETAILED FINDINGS

DISTRICT WEBSITE (REC. 48)

Brownfield ISD does not have a process to ensure that information on the district's website is current, detailed, and compliant with applicable laws and regulations.

Based on interviews with staff, the district relies on social media, rather than its website, as the primary means of communication with students and the community. The Legislative Budget Board's School Performance Review Team visited the district in December 2019. The review team found several instances in which the staff directory obtained

from the Brownfield ISD website was incorrect or not current, and a staff directory did not include photos accompanying most entries. Some information was outdated, and several website pages are blank. The review team also found the following other concerns:

- although the district complies with state law by posting the name, email address, and term of office for each Board of Trustees member, the board's page does not include board member photos despite the existence of a template for this purpose;

- the district provides personal email addresses for board members, rather than official school district email addresses;

- the public menu item for district goals on the website's homepage links to goals for school year 2017–18;

- although the website template includes space for principal and teacher profiles, photo albums, and class schedules, the district has not added this information for most principals and teachers;

- the district website does not have a page describing volunteer opportunities available or containing instructions on how to volunteer;

- the website's homepage includes district contact information and a link to a general email address that routes to the technology director, rather than to staff to disseminate to the proper recipient;

- the posted school year 2018–19 accountability summary is a single page that provides little context. The average reader likely can understand that the district earned all C ratings in the various line items, but might not understand what a C rating in something functions such as closing the gap means; and

- within the topic for student resources, the bullying prevention page has no content.

The district pays an external firm approximately $17,000 annually for website hosting and access to templates. Although it is not listed in his job description, the technology director stated that he manages the Brownfield ISD website. During his tenure, he occasionally has provided instruction to other staff, such as campus secretaries or teachers that were interested in working on the website. Currently, only administrative staff at Oak Grove Elementary School and

Brownfield Middle School update their schools' pages on the district website. The district has not tasked any specific staff officially with responsibility to update, maintain, or develop website content. Community representatives and district staff identified the district's social media page, not the official website, as the primary source for information about the school district. Each campus has a social media page maintained by the campus principal. Although the social media page appears to be well-maintained, accessible, and updated regularly, the district has not established expectations for appropriate content, frequency of updates, or interaction with the community.

Texas and federal laws require school districts that maintain websites to publish certain information on their sites. **Figure 10–2** shows the rules, laws, or regulations that require certain district information to be posted and how the Brownfield ISD website meets those requirements. Much of the information posted on Brownfield ISD's website is minimal, missing, or outdated.

An outdated website limits the district's potential to engage and inform the community and publicize the district's successes. In addition, a public school website that is noncompliant with statute presents risks to the district for not providing full disclosure to the public.

One school district that effectively uses its website to engage and inform the community is Canutillo ISD. The website's homepage contains district news, announcements, quick links, and upcoming events. Site visitors can find information about the district, its board, bonds, leadership, departments, students, parents, teachers, calendar, and school campuses. The colors are inviting, navigation among pages is straightforward, state statutory requirements are met, and all pages link back to the homepage. The Canutillo ISD website also includes a link to the district's nondiscrimination policy.

The Texas Association of School Business Officials (TASBO) maintains a compilation of the Texas Education Code and other governmental agency requirements regarding information that school districts must post to their websites. This information is available on TASBO's website and is updated regularly.

Brownfield ISD should establish procedures to ensure that information on the district website is current, detailed, and compliant with applicable laws and regulations.

FIGURE 10–2
COMPLIANCE WITH RULES, LAWS, AND REGULATIONS REQUIRING ONLINE POSTING OF CERTAIN INFORMATION
BROWNFIELD ISD, SCHOOL YEAR 2019–20

AREA	REQUIRED POSTING ON DISTRICT'S WEBSITE	RULE, LAW, OR REGULATION	NOTES	BROWNFIELD ISD WEBSITE
Academic accountability	Texas Academic Performance Report	The Texas Education Code, §39.362		Yes
Academic accountability	District performance rating	The Texas Education Code, §39.362		Yes
Academic programs	Graduation plans	The Texas Education Code, §28.02121(b)	Notice must include information provided by the Texas Education Agency (TEA) regarding benefits of various graduation plans, levels of achievement, and endorsements. Published information must be in languages other than English in which parents or legal guardians are most proficient for districts that have certain student demographics.	Nothing posted
Ethics	Conflicts, disclosure statements, and questionnaires	The Texas Local Government Code, §176.009	Completed statements and questionnaires are to be posted	Nothing posted
Financial accountability	Superintendent's contract	The Texas Administrative Code, Title 19, §109.1001(q)(3)(B)(i)	The school district must post a copy of the superintendent's contract either as a disclosure in the financial management report provided to attendees at the district's Financial Integrity Rating System of Texas hearing or by posting the contract on the district's website	Nothing posted

FIGURE 10–2 (CONTINUED)
COMPLIANCE WITH RULES, LAWS, AND REGULATIONS REQUIRING ONLINE POSTING OF CERTAIN INFORMATION
BROWNFIELD ISD, SCHOOL YEAR 2019–20

AREA	REQUIRED POSTING ON DISTRICT'S WEBSITE	RULE, LAW, OR REGULATION	NOTES	BROWNFIELD ISD WEBSITE
Academic accountability	Targeted improvement plan	The Texas Education Code, §39A.057(b)	Post before board hearing on targeted improvement plan	Not current
Academic programs	Local innovation plan and campus intervention team	The Texas Education Code, §12A.005	The final version of the proposed local innovation plan is to be posted on the district's website for at least 30 days before the public meeting of the board to adopt the plan. Notice of a campus intervention team public meeting must be posted on the campus website	Posted district of innovation plan is outdated – November 2018
Academic accountability	Annual federal report card	The U.S. Code, Title 20, Chapter 70, §6311(h)(2)	Post the annual federal report card	Most recent posted school year 2017–18
Academic accountability	Campus report card	The Texas Education Code, §39.362(1)	Requires a district to produce a campus score card related to the district's local accountability system that may be displayed on TEA's website.	Most recent posted school year 2017–18
Financial accountability	Summary of proposed budget	The Texas Education Code, §44.0041		One-page budgets for years 2011–12 through 2019–20 posted. Limited information provided.
Financial accountability	Adopted budget	The Texas Education Code, §44.0051	Required to maintain the adopted budget on the district's website until the third anniversary of the date the budget was adopted	One-page summary posted
Financial accountability	Costs and metered amounts for electricity, water, and natural gas for district	The Texas Government Code, §2265.001(b)		Nothing posted
Financial	Federal grant awards	Federal Funding Accountability and Transparency Act	School districts and open-enrollment charter schools that receive federal grant awards totaling more than $25,000 and federal contract awards totaling more than $550,000 as of October 1, 2010, must report certain information, including a description of the award and, for some awards, the total compensation and names of the top five school officials.	Nothing posted
Health	Immunization requirements and recommendations	The Texas Education Code, §38.019	Post in English and Spanish a list of immunization requirements and recommendations, a list of health clinics in the district that offer influenza vaccine, and a link to the Department of State Health Services website providing procedures for claiming an exemption from state immunization requirements	Nothing posted
District programs	Home-schooled student testing	The Texas Education Code, §29.916	Post the dates that Preliminary SAT/National Merit Scholarship Qualifying Test and any college advanced placement tests will be administered at a district campus and provide instructions for participation by a home-schooled pupil	Nothing posted

SOURCES: Legislative Budget Board School Review Team, December 2019; Texas Association of School Board Officers; Brownfield ISD, school year 2019–20.

To implement this recommendation, the superintendent should task a staff position to serve as the website coordinator. The coordinator should develop and manage content on the website that is required by law, important district information, daily postings, and a schedule of monthly and annual information to be posted throughout the year. The website coordinator should coordinate with the superintendent, assistant superintendent, and business manager to ensure that academic and financial information about the district is current, and follow schedules to ensure continued compliance. The district should evaluate the cost of its website vendor regarding the service provided to determine whether the district should continue contracting with the vendor or consider other alternatives. The district also should contact the Regional Education Service Center XVII to inquire about website hosting services and assistance with technology services.

No fiscal impact is assumed related to the web hosting service until the district has evaluated its options. The district could implement this recommendation with existing resources.

COMMUNITY OUTREACH PLAN (REC. 49)

Brownfield ISD does not have a consistent plan for communicating effectively with the community.

According to the superintendent, no policies or procedures regarding communication with the community were in place when the previous superintendent left the district. The superintendent's priority has been to engage with parents and the community to develop positive relations between the district and the community. The superintendent stated that the district has not developed a budget or long-term plan for community involvement. According to the administration, the district has been trying to repair relationships with the community and build a climate of trust.

During onsite interviews, parents and other community stakeholders did not report having positive perceptions of the district before the current administration. Many parents chose to leave Brownfield ISD and enrolled their students in nearby districts. The district reversed this trend during school year 2019–20, when 21 students re-enrolled in the district. Staff interviews indicated that a reason for the change could be attributed to improvement in morale among staff, students, and parents since the appointment of the current superintendent.

Based on feedback from parent interviews, the superintendent has represented the district positively in the community and

has been engaging with local representatives, which has helped to improve relations between the district and the community. Seventy-four percent of parent respondents said that the district communicates with parents in a timely manner. The superintendent is the primary position in the district responsible for community involvement and has not tasked additional district staff with supervising or maintaining this function. Previously, relations reportedly were strained between the district and local businesses and other community organizations. The current administration has engaged with the community newspaper, a local radio station, and local business leaders. The editor of the local newspaper, *The Brownfield News*, said that the newspaper often includes stories about Brownfield ISD and that the district is more engaged with the community since the new superintendent's leadership began.

Although the superintendent and the district leadership team have identified community engagement as a priority, the district does not have a coordinated outreach plan that guides community involvement. The superintendent said that, although the district has no formal community involvement plan or associated budget, the efforts to unite the district and community have been successful. For example, the superintendent reports success in asking local businesses and community groups for help in addressing the district's needs. During interviews, local business representatives expressed support for the district and stated that they would work to ensure that the district's needs were met.

Failure to establish an effective community outreach plan and budget, however, may impede the desired outcomes from beneficial community partnerships. In addition, a lack of coordinated outreach may result in less targeted contact, duplication of requests, and potential misallocation of available resources. Without effective communication among all Brownfield ISD stakeholders, the district may fall short in maintaining coordinated efforts or a unified vision toward student achievement and support.

The National Council of Professors of Educational Administration has outlined the following steps to assist districts in developing a community outreach plan and related policies:

- the board of trustees authorizes the superintendent to facilitate the development of communications policy;

- the superintendent or a designee organizes a communications committee that is composed of key school and community key stakeholders, (e.g.,

students, parents, teachers, administrators, community representatives, and the school board), and represents the diversity of the school and the community;

- the committee develops a rationale for the communications plan, including the guiding principles and philosophy of communication improvement; additional components include vision and mission statements aligned to district policy and goals for school–community relations and a clear purpose, direction, and outcomes for the communications plan;

- the committee conducts a needs assessment to evaluate activities and strategies and inform the district about needed improvements; and

- in developing communications policy, the district needs to address plans for information dissemination to stakeholders and input and feedback mechanisms; the policy should outline the roles of all district and campus staff involved so that responsibilities are clear.

Brownfield ISD should develop an effective community outreach plan that promotes a common vision for the district, addresses the comprehensive needs of all stakeholders, and facilitates communication with community representatives in targeted, intentional, and coordinated ways.

The district administration has implemented several measures to engage the school community. To continue to build on this momentum and to maximize the effects of community partnerships, a formalized community outreach plan and budget should accomplish the following objectives:

- ensure that all partners share a common vision – the community and all involved partners should agree on the same goals and expectations;

- establish formal relationships and collaborative structures to engage stakeholders – initiating and sustaining stakeholder participation often requires developing structured opportunities ranging from establishing task forces to signing formal agreements;

- encourage open dialogue about challenges and solutions – to foster shared ownership, stakeholders must engage honestly and constructively with each other to solve problems and make midcourse corrections;

- engage partners in the use of data – sharing data enables all stakeholders to understand where things

stand and hold each other accountable for making measurable progress.

- develop and empower central office capacity at the district level to sustain community engagement – continued capacity can be developed through assigning a position within a district's central office dedicated to supporting a the community and district; and

- leverage community resources and connect funding sources – community schools capitalize on the financial assets of community partners and funding sources to support programs and activities aligned with their common vision.

To implement the community outreach plan, Brownfield ISD should designate one staff as a central point of contact (POC) at the district level, and one staff at each campus as the community involvement coordinator. Working within the district would enable the POC to conduct activities that serve the district's best interests and use available resources effectively. Additionally, a POC would serve as the contact for parents and community stakeholders that need information or want to provide feedback to the district.

In developing the community outreach plan, Brownfield ISD should follow the steps outlined by the National Council of Professors of Educational Administration. These steps can be modified to meet the particular needs of Brownfield ISD.

After the superintendent has presented the plan to the board, the superintendent should disseminate it to all key stakeholders, including district and campus staff, parents, and related organizations, such as parent groups, media, business and industry representatives, community groups, and local government.

The district could implement this recommendation with existing resources.

PARENT AND COMMUNITY INVOLVEMENT TRACKING (REC. 50)
Brownfield ISD does not record parental involvement or community participation and does not recognize parent and community volunteers formally.

During interviews, staff said that the majority of volunteers in the district comes from a core group of individuals. In review team surveys, 44.7 percent of district parents disagreed or strongly disagreed that campuses have a sufficient number of volunteers to help student and school programs. The

district does not have a coordinated plan to market its volunteer opportunities for individuals that may be interested, and the district's website does not feature a volunteering section.

For parents that volunteer at the campuses, no standard system tracks the volunteer information, such as names, home and email addresses, areas of interest, or the number of volunteer hours accrued per volunteer per campus. Without a system to track volunteer information, the district cannot recognize formally those volunteers for their work on behalf of the district. Failure to track and recognize parent volunteers may limit parental engagement with the district. A system that acknowledges parent volunteers validates the effects of parental support, conveys appreciation, and further serves to motivate existing and additional parent volunteers. The lack of a coordinated system may continue to limit access to a more diverse group of parent volunteers beyond the core supporters.

Without information about the number of hours worked by volunteer and by campus, the district lacks historical information regarding volunteer interests and participation, especially for events that may be repeated in subsequent years. The lack of this tracked information also impedes the district's ability to establish a volunteer contact list for events and fund raisers.

Effective school districts recognize that, without volunteers to perform certain functions, the district might require staff to perform those functions at an additional expense. Parent and community volunteer hours enable school districts to conserve valuable financial resources and funds.

Volunteers can affect the overall success of the educational system. They can enable teachers and staff to use more of their time for instruction. They can provide more opportunity for students to receive individual assistance. Volunteers help to enhance the quality of student instruction and school experiences through the following actions:

- supporting the educational process;

- providing students with individual assistance and attention;

- enriching students' curriculum and broadening their awareness of and experiences with individuals that share different backgrounds, resources, and talents;

- helping staff with instructional tasks and duties;

- providing opportunities for parents, staff, and community representatives to share knowledge, talents, and resources with students; and

- strengthening relations among schools, homes, and the community.

Considering the absence of a comprehensive volunteer program, Brownfield ISD and individual campuses may lack the opportunity to build reciprocally trusting relationships among parents, staff, and the community.

The Texas Education Agency (TEA) emphasizes the importance of parent and family involvement in public education. The agency has developed the Parent Involvement and Community Empowerment Initiative to address the need for more parent involvement and community participation. TEA has published a *Comprehensive Guide to Implementing an Effective Parent and Family Engagement Program* to assist campuses, parent groups, and community volunteers in finding new ways to involve parents and families in the education of their students. School districts can use the publication to help local campuses, parent groups, school districts, and community volunteers to look at new ways to involve parents and families in educating their students; to help parents feel more comfortable with the campus so that they will want to become more involved; and to provide an overview of key elements of Texas' public education program. The publication includes surveys, handouts, activities for meetings, and research on parental involvement.

The National Parent Teacher Association's *Seven Steps for Organizing Volunteers* provides useful information for developing and maintaining an active school volunteer program, including the following steps:

- assessing volunteer needs;

- working with and training principals, teachers, and staff on effectively using and supervising volunteers;

- setting goals and objectives for volunteer assignments;

- recruiting volunteers;

- training and orienting volunteers;

- retaining and recognizing volunteers; and

- evaluating volunteer performance and program success.

Denton ISD's office of communications and community relations administers the districtwide volunteer program. The district recruits volunteers from among parents, business representatives, and community representatives by posting on its website information about the program, a code of conduct for volunteers, and an online application for prospective volunteers. Bryan ISD operates the "Be the One" Community Volunteer Program with a focus on academic achievement. Volunteers in this program assist campuses by enhancing reading skills of students, introducing students to individuals that share different backgrounds, and strengthening partnerships among homes, schools, and the community.

San Elizario ISD's parent volunteer program has approximately 130 parent volunteers within the district of more than 4,000 students. Those volunteers contributed nearly 20,000 hours of volunteer time during one academic year. Volunteers serve as classroom tutors, chaperones for field trips, library aides, classroom aides, monitors, and office aides. The district garnered parent involvement by developing a parent involvement plan, establishing a parental advisory committee, offering meaningful volunteer opportunities, and capitalizing upon the recruitment efforts of parent liaisons. The parental advisory committee includes two parent volunteer representatives from each campus and meets three times per year. The committee provides input to the district, support for parent liaisons and other district parents, and feedback regarding program implementation and program activities.

Brownfield ISD should develop a volunteer involvement program that includes written guidelines for campuses and volunteers, recruitment strategies, tracking activities, and a process to recognize participation.

The superintendent should designate a district liaison, preferably bilingual, to coordinate the program. The district liaison should form a committee that includes administrators, teachers, parents, and students from secondary schools to develop a volunteer program that encourages parents and community representatives to participate in the district's educational process. The committee should use TEA's *Comprehensive Guide to Implementing an Effective Parent and Family Engagement Program* as a guideline. The committee should designate a representative at each campus responsible for implementing volunteer opportunities, tracking activities, and recognizing parent volunteers.

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 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.