LEGISLATIVE BUDGET BOARD

Corrigan-Camden Independent School District

Management and Performance Review

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LEGISLATIVE BUDGET BOARD

September 21, 2018

Sherry Hughes
Superintendent
Corrigan-Camden Independent School District

Dear Superintendent Hughes:

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

The report's recommendations will help Corrigan-Camden ISD improve its overall performance as it provides services to students, staff, and community members. The report also highlights model practices and programs that Corrigan-Camden ISD is providing.

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

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

Respectfully submitted,

Ursula Parks
Director
Legislative Budget Board

/js

cc: Sean Burks
    Marvin Hurley
    Angela Conarroe
    Anthony Harrell

Lync Cavanaugh
Michael Woodard
Misty Woodard

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EXECUTIVE SUMMARY

The Texas Legislature established the Texas School Performance Review in 1990 to "periodically review the effectiveness and efficiency of the budgets and operations of school districts" (the Texas Government Code, Section 322.016). The Legislative Budget Board's (LBB) School Performance Review Team conducts comprehensive and targeted reviews of school districts' and charter schools' educational, financial, and operational services and programs. The review team produces reports that identify accomplishments, findings, and recommendations based upon the analysis of data and onsite study of each district's operations. A comprehensive review examines 12 functional areas and recommends ways to cut 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.

To gain an understanding of the school district's operations before conducting an onsite review, the LBB review team requests data from the district and multiple state agencies, including the Texas Education Agency (TEA), the Texas Department of Agriculture, and the Texas School Safety Center. LBB staff may implement other methods to obtain feedback regarding district operations, including surveys of parents, community representatives, and district and campus staff. While onsite in the district, the review team gathers information through multiple interviews and focus groups with district and campus administrators, staff, and board members.

Corrigan-Camden Independent School District (CCISD) is located in Polk County in Corrigan, 96 miles north of Houston. Regional Education Service Center VI (Region 6), which is located in Huntsville, serves the district. The state legislators for the district are Senator Robert Nichols and Representative James White.

The district has three instructional campuses, including Corrigan-Camden High School, Corrigan-Camden Junior High School, and Corrigan-Camden Elementary School. During school year 2016–17, CCISD had approximately 917 students. The student population was 38.3 percent Hispanic, 33.3 percent White, 26.4 percent African American, and 0.3 percent Asian. Approximately 74.5 percent of students were considered economically disadvantaged, greater than the state average of 59.0 percent. The district identified 14.2 percent of students as English Language Learners, which was less than the state average of 18.9 percent. The district also identified approximately 56.5 percent of students as at risk, which was greater than the state average of 50.3 percent.

EDUCATIONAL OVERVIEW

CCISD has a history of variable academic achievement. In accordance with the state accountability system, TEA rated the district Met Standard for school year 2014–15 and Improvement Required for school years 2015–16 to 2016–17. For school year 2016–17, TEA rated the high school and junior high campuses Met Standard, and the elementary campus received a rating of Improvement Required. **Figure 1** shows state accountability ratings from school years 2013–14 to 2016–17 for the district and the individual campuses in accordance with the system that was implemented during school year 2012–13 (Met Standard, Improvement Required, or Not Rated).

Figure 2 shows various academic measures of CCISD compared to the averages of other school districts in Region 6 and the state.

FINANCIAL OVERVIEW

For school year 2016–17, CCISD's property wealth per student was $234,614. This amount places the district at less than and, thus, not subject to the state's primary equalized wealth level (EWL) of $514,000. The state recaptures a portion of wealthy school districts' local tax revenue if it is greater than the primary EWL to assist in financing public education in other districts. This primary EWL applies to a district's tax rates up to $1.00 per $100 of valuation. The state's school finance system has a secondary EWL that applies to certain enrichment tax effort of greater than $1.00.

For school year 2016–17, CCISD's total actual expenditures were $13.0 million. CCISD's per-pupil actual operating expenditures for school year 2016–17 were $11,307, compared to the state average of $9,503. For school year 2016–17, CCISD spent approximately 55.7 percent of total actual operating expenditures on instruction, compared to the state average of approximately 63.1 percent. The

FIGURE 1
CORRIGAN-CAMDEN ISD STATE ACCOUNTABILITY RATINGS
SCHOOL YEARS 2013–14 TO 2016–17

YEAR	DISTRICT	CCISD HIGH SCHOOL	CCISD JUNIOR HIGH	CCISD ELEMENTARY SCHOOL
2013–14	Met Standard	Met Standard	Met Standard	Met Standard (1)
2014–15	Met Standard	Met Standard	Improvement Required	Met Standard (2)
2015–16	Improvement Required	Improvement Required	Met Standard	Improvement Required (3)
2016–17	Improvement Required	Met Standard	Met Standard	Improvement Required

NOTES:
(1) For school year 2013–14, Corrigan-Camden Primary and Corrigan-Camden Elementary were separate campuses, both of which met standard.
(2) For school years 2014–15 and 2015–16, Corrigan-Camden Primary and Corrigan-Camden Elementary were reported as paired campuses.
(3) CCISD=Corrigan-Camden ISD.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2013–14 to 2016–17.

instructional expenditures percentage was calculated using the district's total actual operating expenditures that funded direct instructional activities, including the following federal and state account code categories: Function 11 (Instruction), Function 12 (Instructional Resources and Media Sources), Function 13 (Curriculum Development and Instructional Staff Development), and Function 31 (Guidance, Counseling, and Evaluation Services.)

ACCOMPLISHMENTS

During the onsite review, the LBB's review team identified noteworthy accomplishments in some of the district's practices.
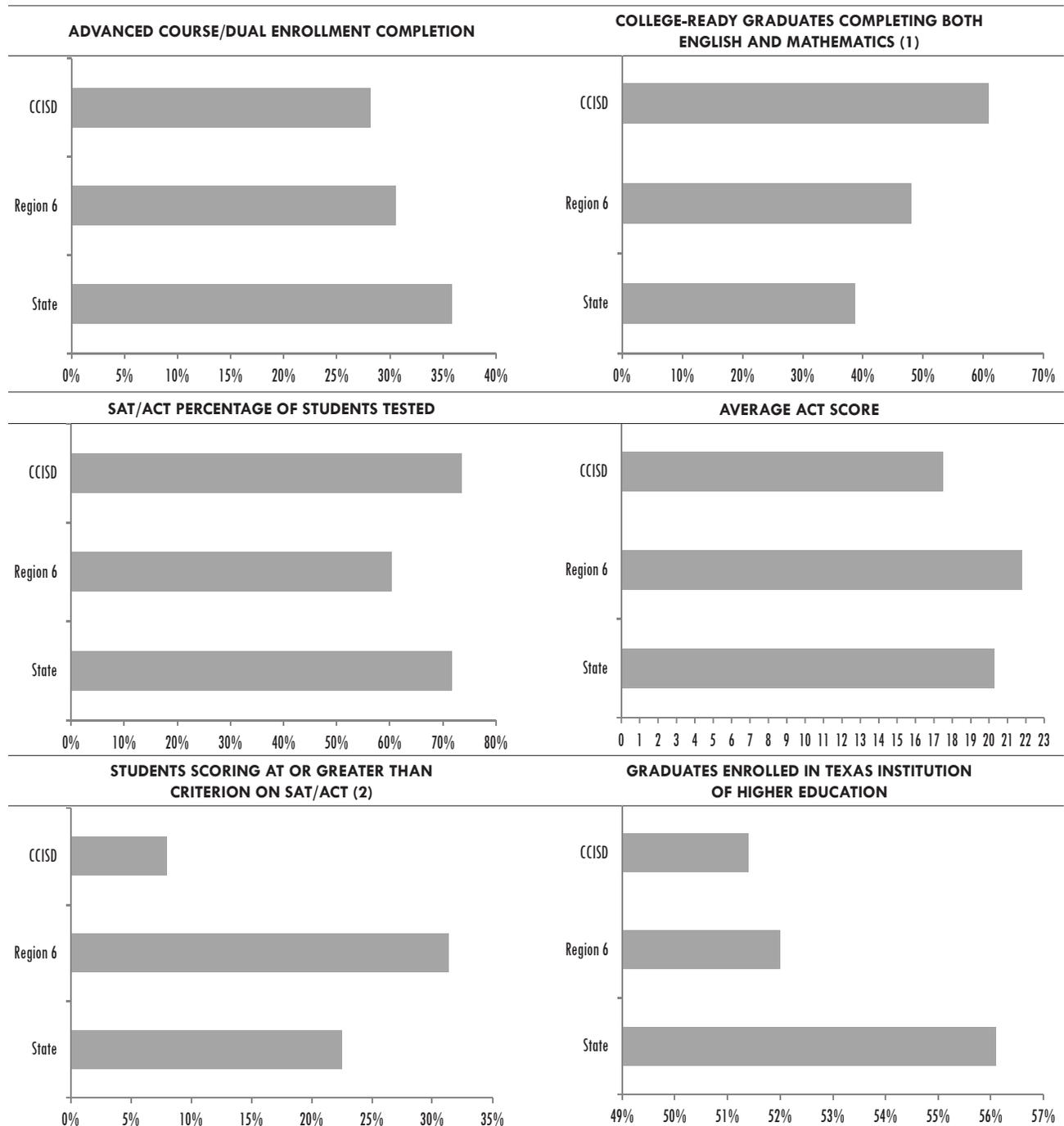
INNOVATIVE, LOW-COST APPROACHES

CCISD developed innovative programs to fulfill the district's technological needs while working within a limited budget. CCISD collaborated with a nearby state prison to obtain computer hardware at no cost to the district. The prison receives computer components through tax-deductible donations from area businesses. Inmates process the donated components, and assemble and test ready-to-use computers based on the request orders submitted by the CCISD Technology Department. The program works for the district as large-quantity, noncritical technology infrastructure, including computer labs and student classroom computers. CCISD effectively recognizes where this program is applicable and appropriate, and where the district needs to make new purchases.

Another innovative and cost-saving program is the technology club. This elective class is available to students via an application process. During class, students shadow members of the Technology Department as they perform their daily duties. The technology club provides students hands-on experience in the technology field, and the students' assistance lightens the workload of the Technology Department, thus saving money. It functions similarly to a work-study program except that students do not leave the campus.

BREAKFAST PROGRAM ACCESS

Corrigan-Camden ISD successfully implemented two alternative meal-service models to improve access to the School Breakfast Program at all grade levels. Alternative service models that move breakfast from the cafeteria and make it a part of the school day often increase breakfast participation. These models overcome timing, convenience, and stigma barriers that inhibit participation in school breakfast. CCISD implemented two alternative-service models, Breakfast in the Classroom (BIC) and Breakfast 2.5, to increase School Breakfast Program (SBP) participation districtwide. During school year 2017–18, the district implemented BIC at the CCISD Elementary School campus. According to onsite interviews, the implementation of BIC has increased participation in the SBP significantly, and teachers report that BIC procedures do not detract from normal classroom conduct. Additionally, CCISD implemented Breakfast 2.5 at the junior high school and high school. The district serves breakfast to students in the cafeteria from 7:30 am to 8 am. During school year

FIGURE 2
CORRIGAN-CAMDEN ISD STUDENT ACADEMIC MEASURES COMPARED TO REGIONAL EDUCATION SERVICE CENTER VI AND STATE AVERAGES
SCHOOL YEAR 2016–17

ADVANCED COURSE/DUAL ENROLLMENT COMPLETION

COLLEGE-READY GRADUATES COMPLETING BOTH
ENGLISH AND MATHEMATICS (1)

SAT/ACT PERCENTAGE OF STUDENTS TESTED

AVERAGE ACT SCORE

STUDENTS SCORING AT OR GREATER THAN
CRITERION ON SAT/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 State of Texas Assessments of
      Academic Readiness exit-level test, 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.
(3)   SAT=Scholastic Aptitude Test; ACT=American College Testing; Region 6=Regional Education Service Center VI.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2016–17.

2015–16, the high school cafeteria began serving Breakfast 2.5 from 9:48 am to 10:10 am between second and third periods to offer students who arrive after the first breakfast an opportunity to eat breakfast without being late to class. According to onsite interviews, Breakfast 2.5 is popular with the students and has increased participation in the SBP with little to no class disruption.

INSTALLATION OF CAMERAS ON BUSES

CCISD purchased and installed security cameras on buses to improve student behavior and safety and security. Although installing interior-view cameras on buses is common in many districts, the Transportation Department procured cameras that record interior and exterior views of the bus. Transportation Department staff e-mail or deliver to school administrators digital copies of recordings to follow up on student behavior issues that occur while students are on or around the bus. Bus drivers said that since the district installed the cameras during school year 2014–15, the number of student behavior incidents has decreased. The Transportation Department also procured surveillance cameras that have been installed in the bus yard and garage area.

SOCIAL MEDIA PAGE

CCISD's social media page provides district stakeholders with relevant information and celebrates achievements. Through increased, regularly updated content, the number of users that clicked the Like button on the district Facebook page increased from 335 in 2013 to 1,512 users in January 2017. Staff, parents, and community representatives stated that the district social media page is a helpful, well-utilized resource for the community. District postings are celebratory and informative, and cover topics affecting students and families at every campus. The district uses the social media page to recognize community partnerships and donors, provide monthly menus and information about food service events, promote district events, communicate transportation schedules, and advertise the referral process for the gifted and talented program.

FINDINGS AND RECOMMENDATIONS

The LBB's School Performance Review Team identified significant findings and recommendations based upon the analysis of data and onsite review of the district's operations. Some of the recommendations provided in the review are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed by the school district to determine the level of priority, appropriate timeline, and method of implementation.

FINANCIAL OVERSIGHT

CCISD's financial oversight is inefficient in several areas.

CCISD lacks an effective process to manage and safeguard district assets. The district does not currently inventory its fixed assets, which does not comply with best practices delineated by the Texas Comptroller of Public Accounts. The district also does not utilize the asset management module of the district's accounting software.

CCISD also does not have adequate controls over cash management. Staff within the district routinely handle cash transactions at athletic events, fund-raisers, food services, and other district activities. Procedures for handling cash are not consistent, and some functions do not have a procedure.

Additionally, CCISD lacks a process to monitor the financial performance of the food service management company (FSMC). CCISD contracts with an FSMC to operate the child nutrition program (CNP) in the district. During onsite interviews, staff indicated confusion exists as to who receives and monitors financial information for CCISD's Food Services Department. By failing to monitor the financial performance of the CNP, CCISD may not have collected payments from the FSMC owed to the district in accordance with a provision in the contract called the FSMC guaranty. CCISD also does not ensure that the FSMC promotes maximum participation in the CNP. At the time of the review, the FSMC had not conducted taste testing or student surveys, and CNP participation was lower than the state averages at some of CCISD's campuses. By failing to maximize participation at the campus level, the district forgoes potential revenues from reimbursement claims for eligible students who are not participating. CCISD does not receive the full amount of potential federal and state revenues to support the food services operation.

CCISD lacks a consistent and effective process for technology inventory management, security of technology items and network infrastructure, and fire safety. Although the Technology Department logs most technology items into an inventory database, staff acknowledged that many of the listings in the database are outdated and may include technology that is no longer in use or no longer in the district.

The review team observed several examples of unsecured and unmonitored technology items. In addition, the communications closets did not all have smoke detectors or functioning fire extinguishers. Without these items, network infrastructure is susceptible to destruction that also could extend to school areas outside the closet.

To improve financial oversight, the district should:

- develop and implement a comprehensive inventory process to guide the recording, inventorying, tracking, and disposal of all the district's assets;

- develop written cash-handling procedures and train all staff who handle funds in the proper use of those procedures;

- develop financial monitoring tools and reports to improve oversight of the food service management company;

- ensure that the FSMC develops strategies to solicit student feedback and improve menus to increase participation in the Child Nutrition Program; and

- develop and implement processes for inventory management, security of technology items and network infrastructure, and fire safety.

BOARD OPERATIONS

CCISD does not effectively manage its board operations. CCISD's Board of Trustees does not provide active oversight or management of the district. The board has adopted a passive approach toward several of its responsibilities. During onsite interviews, CCISD board members indicated that the superintendent "owned" the district's academic and financial information. Board members also indicated that they left it to administrative leaders to interpret data and information, recommend solutions, and guide the governing process for the district. For example, the board approved without discussion or questions the district improvement plan (DIP) and the campus improvement plans (CIP) that set the district's annual goals and priorities.

Additionally, the board evaluates the superintendent using the same goals each year. Board members could not identify when the goals they are using were first developed or last updated. The board conducted the superintendent's school year 2016–17 evaluation in a closed session with a duration of 15 minutes. The superintendent received a perfect score on all areas of the evaluation, and the board included no

written comments to justify the scores on the superintendent's evaluation form.

Furthermore, one of the primary responsibilities of a school board is to ensure that the district uses its resources wisely, efficiently, and effectively. However, the CCISD board often approves the budget and sets the district tax rate with little deliberation or discussion. The board approved the school year 2017–18 budget and the tax rate within a duration of 30 minutes. During onsite interviews, board members stated that they provide little feedback regarding the budget, and they trust that the superintendent will be efficient with district spending. No board member or CCISD staff could recall any changes made to the budget based on board feedback during the last five years.

CCISD lacks a method to hold board members accountable for attending board meetings. Board members repeatedly are absent from school board meetings, and the board's operating procedures lack guidance regarding attendance at regular and special-called board meetings. For example, of the 17 CCISD board meetings held from September 2016 to October 2017, one member was absent in 30.0 percent of meetings; two board members were absent in 35.0 percent of meetings; and three members were absent in 35.0 percent. None of the 17 meetings were attended by all seven board members.

To improve board operations, the district should do the following:

- conduct an annual board self-assessment to enhance accountability to district stakeholders. The CCISD board should use a self-assessment tool to increase board member engagement. Individual board members and the superintendent should complete the self-assessment tool annually, schedule a meeting to discuss the results, and determine the next steps the board will take to improve its performance; and

- amend the board's operating procedures to include a commitment of regular attendance for all board meetings.

ROLE DEFINITIONS

CCISD lacks consistently defined roles for some district functions.

CCISD's human resources (HR) functions are fragmented, leading to inconsistency in HR practices. In July 2016, the district filled the HR director position. In early 2017, the superintendent developed the position's job description, which defines the primary purpose of the position as directing

and managing the human resources function. However, the HR director does not complete all of the human resources responsibilities listed in the job description; the superintendent and the business manager implement many of these duties. The HR director is functioning primarily as the district's payroll clerk. Because of the payroll responsibilities, the HR director is not able to oversee all the human resources functions, which results in inconsistencies throughout the district.

CCISD also lacks effective internal controls and segregation of duties in the HR and payroll functions. The business manager and the HR director each have full access to human resources, payroll, and accounts payable software modules. This access provides those positions the ability to enter new staff into the system and to execute a payment to that staff. Although the district has no indication that this ability has been misused, these combined abilities present the opportunity for fraud.

CCISD's Technology Department also lacks effective oversight and clearly defined roles for staff. The network administrator assumes a leadership role within the department; however, the title and responsibilities do not include the overall management of the Technology Department. With no position held responsible for the management and oversight of the department, administrative tasks either are not performed efficiently or are not conducted. Responsibilities such as budgeting, planning, and other tasks are not accomplished effectively by CCISD's Technology Department, and none of these responsibilities are included in the network administrator's job description.

To define functional area roles more effectively, the district should do the following:

- transfer all human resources duties to the HR director and reassign the payroll duties;

- review the roles, responsibilities, and duties of Business Office staff, and develop a system enabling the segregation of their duties to ensure effective internal controls to prevent fraud, theft, and financial impropriety in accordance with board policy;

- develop written standard operating and safety procedures for the Transportation Department; and

- eliminate the network administrator position and develop a technology director position.

COMPLIANCE

Some CCISD operations either do not comply with state or federal regulations, or are not consistent with industry standards.

CCISD does not track performance of its buses. Staff indicated that the department does not track any performance metrics systematically and does not use industry benchmarks to assess the overall effectiveness of the Transportation Department.

CCISD also lacks a process for managing, monitoring, and implementing emergency operations procedures. CCISD's Emergency Operations Plan does not meet statutory requirements set by TEA. For example, during onsite interviews, no CCISD staff indicated that they received emergency preparedness training or were aware of any schedule of available trainings on how to respond to emergencies.

Additionally, CCISD's supplemental pay for nonexempt staff violates board policy and may not follow the U.S. Fair Labor Standards Act (FLSA) provisions. CCISD's board policy regarding compensation plan incentives and stipends says that the superintendent may assign supplemental duties only to staff who are exempt from the FLSA provisions. However, CCISD pays 28 nonexempt staff—including some instructional aides, custodians, and maintenance staff—supplemental stipends to drive school buses as secondary positions. The district requires that nonexempt staff keep logs of the supplemental duties they perform. The nonexempt staff do not keep exact records of the time spent in the completion of the supplemental duties each pay period. FLSA requires employers to keep accurate time records of nonexempt staff's total daily and weekly work hours. The district calculates the overtime pay rate for these staff who work dual assignments at one-and-one-half times their regular hourly rate and not on the bus driver rate. This pay rate results in some staff being overpaid and other staff being underpaid, depending on what their regular pay rate is compared to the bus driver pay rate.

CCISD's Food Services Department also does not comply consistently with industry standards and best practices. For example, CCISD uses inaccurate meal counting and claiming procedures. Although the district developed and TDA approved the district's procedure, the process for counting and claiming observed during the onsite review does not comply with these written procedures or program regulations.

Another example of a lack of compliance in CCISD's food service operations is that the district has not properly implemented the Offer versus Serve (OVS) provision of the federal CNP in all campuses at all age and grade levels. CCISD has implemented OVS at all grade levels with the exception of prekindergarten and grades kindergarten to five, which receive breakfast in the classroom.

A third example is that the district has implemented an alternative point-of-service collection method without TDA approval. Before the start of school year 2017–18, the FSMC general manager developed procedures for teachers to implement Breakfast in the Classroom (BIC). However, CCISD did not submit the procedures for TDA approval in accordance with TDA's application process to participate in the CNP.

CCISD does not monitor the FSMC to ensure that food services staff follow standardized recipes consistently and maintain complete and accurate food production records.

To comply with state and federal regulations, and to be consistent with industry standards, the district should do the following:

- develop performance metrics to measure the effectiveness and efficiency of the Transportation Department;

- develop districtwide and campus-based emergency documents, including an updated emergency operations plan, and consistently implement required drills;

- discontinue the use of supplemental pay for nonexempt staff and alter the overtime calculation for staff who also drive buses;

- ensure that the FSMC uses counting and claiming processes that provide accurate reports of reimbursable meals in accordance with written procedures and federal regulations;

- monitor the FSMC to ensure that the food services staff correctly implement OVS for breakfast and lunch at all grade levels;

- ensure that the district's policy statement includes all collection methods for counting reimbursable meals; and

- develop a process to ensure that food services staff use standardized recipes consistently and record accurate and complete food production records.

EDUCATIONAL OPERATIONS

CCISD maintains some ineffective educational operations.

CCISD lacks an effective process for curriculum adoption, review, and revision. Although CCISD uses the Texas Essential Knowledge and Skills (TEKS) Resource System as its curriculum management system, the district has gaps in the curriculum decision-making process. CCISD staff indicated that the district does not have a formal process to revise, align, or evaluate its curriculum and does not provide instructional guides. The district also has no written procedures detailing who is involved in the curriculum process nor what actions they should take, and no specific timeline for review and revision.

CCISD has not implemented districtwide procedures consistently to ensure effective, consistent interventions for struggling students in all grade levels. CCISD employs the response to intervention (RTI) process to provide early identification and support of students with learning and behavior needs. However, CCISD does not oversee the implementation of the RTI process, and each campus implements RTI differently. CCISD staff described RTI at the secondary level as minimal or nonexistent.

Additionally, CCISD does not offer a comprehensive program to meet the instructional needs of students identified as English Language Learners (ELL). During school year 2016–17, CCISD identified 14.2 percent of its students as ELL. CCISD's school year 2016–17 DIP contains one strategy related to the English as a Second Language (ESL) program. The goal of an ESL program is to provide ELL students with instructional support that will enable them to participate fully in their educational experience in schools and in their communities. The ESL-related strategy in the DIP states that the district will provide staff with professional development to utilize ESL pullout instruction effectively at all campuses. The DIP strategy indicated that the frequency of professional development would be each six weeks, and the ESL coordinator would be responsible for the strategy. However, at the time of the onsite review, the district did not provide documentation of ongoing ESL professional development, did not have an ESL coordinator or similar staff position, and did not provide pullout instruction on all campuses. District staff have not been tasked effectively with implementing and monitoring the ESL strategy within the

DIP. When the review team asked the superintendent and district staff about ESL planning, they indicated no long-term district plans for the ESL program, and they did not reference the DIP. Additionally, neither the curriculum and programs director nor other district staff have evaluated the effectiveness of the ESL program at CCISD.

To improve the efficiency of educational operations, the district should do the following:

- develop and implement a comprehensive curriculum management plan;

- implement a Response to Intervention process districtwide with fidelity to the model and regularly evaluate student intervention programs for effectiveness; and

- develop and implement a process for continuous evaluation of the district's English as a Second Language program to ensure that instructional delivery effectively meets the needs of English Language Learner students.

The chapters that follow contain a summary of the district's accomplishments, findings, and numbered recommendations. Detailed explanations for accomplishments and recommendations follow the summary and include fiscal impacts.

Each chapter concludes with a fiscal chart showing the chapter's recommendations and associated savings or costs from school years 2018–19 to 2022–23. The following figure shows a summary of the fiscal impact of all 43 recommendations in the performance review.

FISCAL IMPACT

CATEGORY	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
Gross Savings	$39,689	$39,689	$39,689	$39,689	$39,689	$198,445	$5,000
Gross Costs	($36,506)	($36,506)	($36,506)	($36,506)	($36,506)	($182,530)	($2,880)
Total	**$3,183**	**$3,183**	**$3,183**	**$3,183**	**$3,183**	**$15,915**	**$2,120**

CHAPTER 1. DISTRICT LEADERSHIP, ORGANIZATION, AND MANAGEMENT

An independent school district's governance structure, staff management, and planning process provide the foundation for effective and efficient education of students. An elected seven-member 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 is responsible for implementing policy, managing district operations, recommending staffing levels, and allocating the resources to implement district priorities. The board and superintendent collaborate as a leadership team to meet district stakeholder needs.

Corrigan-Camden Independent School District (CCISD) is located in Corrigan, which covers 1.8 square miles. The district also serves the city of Seven Oaks and the unincorporated communities of Camden and Moscow. CCISD is located in Polk County, which is approximately 95 miles northeast of Houston. According to the U.S. Census Bureau, the city of Corrigan had a population of 1,762 in 2016, a 10 percent increase since the official 2010 census. According to the 2010 census, the population categorized themselves as 42.2 percent African American, 40.8 percent White, and 22.6 percent Hispanic. In 2010, the percentage of persons younger than age 18 was 34.8 percent, and the area's median household income in 2015 was $29,385.

During school year 2016–17, CCISD had approximately 917 students. The student population was 38.3 percent Hispanic, 26.4 percent African American, 33.3 percent White, and 0.3 percent Asian. The district has three campuses, including Corrigan-Camden High School, grades nine to 12; Corrigan-Camden Junior High School, grades six to eight; and Corrigan-Camden Elementary School, prekindergarten to grade five. In school year 2015–16, the district operated a primary school campus but this school was combined with the elementary school beginning in school year 2016–17.

The CCISD Board of Trustees (board), as the policy-making body authorized by law to govern the district, has the following duties:

- adopting goals and objectives for the district;
- reviewing and acting on policies;
- adopting an annual budget and setting the tax rate; and
- approving school staff as recommended by the superintendent.

The seven-member board serves terms of three years, with elections held every two years. **Figure 1–1** shows CCISD's board members.

The board meets on the third Monday of each month at 7:00 p.m. in CCISD's central administration office. Board Policy BE (LOCAL), regarding board meetings, states that the board president can call special meetings at his or her discretion or upon request by two board members. From August 2016 to October 2017, the district held eight special

FIGURE 1–1
CORRIGAN-CAMDEN ISD BOARD OF TRUSTEES
SCHOOL YEAR 2017–18

BOARD MEMBER (1)	TITLE	TERM EXPIRATION	YEARS OF SERVICE
Sean Burks	President	2018	9
Marvin Hurley	Vice President	2019	6
Seth Handley	Secretary	2018	5
Anthony Harrell	Member	2018	5
Joel Scott	Member	2019	4
Ryan Burris	Member	2019	4
Lync Cavanaugh	Member	2018	3

NOTE: The May 2018 board elections shifted board members. Since the onsite review, board members Seth Handley, Joel Scott, and Ryan Burris were replaced by Angela Conarroe, Misty Woodard, and Michael Woodard.
SOURCE: Corrigan-Camden ISD, September 2017.

meetings. The special meetings covered topics including board training, adopting the annual budget and tax rate, personnel discussions, and addressing flood damage in district facilities.

The public may attend all meetings and may address the board on topics of interest. If the public wishes to participate, individuals sign up with the presiding officer or designee before the meeting begins and indicate the topics about which they wish to speak. Presentations are limited to five minutes.

Board meetings are not audio-recorded, and the superintendent's secretary typically takes the minutes of board meetings. The superintendent's secretary compiles the minutes and posts them online through the software program BoardBook. Board members have ongoing access to all archived meetings and documents. The minutes are made available to CCISD board members for approval at the next board meeting.

The board hired the superintendent in 2013. Her contract will end June 30, 2022. The superintendent reports directly to the board, and 10 staff report directly to the superintendent. The nine positions that report directly to the superintendent include:

- three campus principals;
- transportation director;
- two athletic directors;
- business manager;

- superintendent's secretary; and
- curriculum and programs director.

Figure 1–2 shows CCISD's organization.

FINDINGS

♦ Corrigan-Camden ISD's board of trustees do not provide active oversight or management of the district.

♦ Corrigan-Camden ISD's board members do not obtain all the training hours required by statute and board policy.

♦ Corrigan-Camden ISD lacks a method to hold board members accountable for attending board meetings.

♦ Corrigan-Camden ISD lacks a process to evaluate the performance of administrators in the superintendent's cabinet.

♦ Corrigan-Camden ISD lacks a long-range strategic planning process to provide direction for the district.

RECOMMENDATIONS

♦ **Recommendation 1: Conduct an annual board self-assessment to enhance accountability to district stakeholders.**

♦ **Recommendation 2: Modify the school board's continuing education training and orientation system to ensure that board members understand their responsibilities and the role, structure, and process of the governing board.**

**FIGURE 1–2
CORRIGAN-CAMDEN ISD ORGANIZATION
SCHOOL YEAR 2017–18**
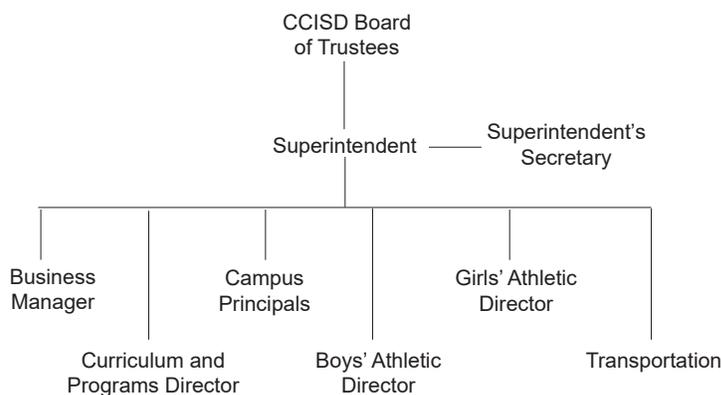
SOURCE: Corrigan-Camden ISD, September 2017.

♦ **Recommendation 3: Amend the board's operating procedures to include a commitment of regular attendance for all board meetings.**

♦ **Recommendation 4: Develop written procedures to manage the district's performance evaluation for administrators in accordance with board policies.**

♦ **Recommendation 5: Develop and implement a three-year to five-year comprehensive strategic plan with measureable objectives to ensure accountability and evaluate the district's effectiveness in meeting its students' needs.**

DETAILED FINDINGS

DISTRICT MANAGEMENT AND OVERSIGHT (REC. 1)

CCISD's board of trustees does not provide active oversight or management of the district.

The Texas Education Code, Section 11.05, states that an independent school district is governed by a board of trustees, which, as a body corporate, shall:

• oversee the management of the district; and

• ensure that the superintendent implements and monitors plans, procedures, programs, and systems to achieve appropriate, clearly defined, and desired results in the major areas of district operations.

The Texas Association of School Boards (TASB) groups board responsibilities into the following five categories:

• adopt goals and priorities and monitor success – the board sets the course for the district's schools by adopting goals and priorities to keep the district progressing;

• adopt policies and review for effectiveness – the board adopts local policies that guide how the district operates; these policies are consistent with and within the scope authorized by federal and state laws and regulations;

• hire and evaluate the superintendent – the board determines whom to hire as superintendent; through yearly written performance evaluations and ongoing discussions, the board assesses the superintendent's progress toward district goals;

• adopt a budget and set a tax rate – the superintendent and staff formulate the school district budget and present it to the board for approval; the superintendent makes the board's revisions; and

• communicate with the community – board members are the link between the school system and the public; as advocates for public education, board members help build support and report district progress by communicating with the community, students, staff, parents, and the media.

The CCISD board has adopted a passive approach toward several of its responsibilities. During onsite interviews, CCISD board members indicated that the superintendent "owned" the district's academic and financial information. Board members also indicated that they left it to administrative leaders to interpret data and information, recommend solutions, and guide the governing process for the district. The following examples show the board's passive approach in some of these responsibilities.

Adopt Goals and Priorities and Monitor Success

The primary district planning documents for CCISD, the district improvement plan (DIP) and the campus improvement plans (CIP), set the annual goals and priorities of the district. The board reviewed and approved the school year 2016–17 DIP and CIPs at the September 19, 2016, board meeting. During this meeting, the board approved nine items, including the DIP and the CIPs. The board approved these items as part of a consent agenda without discussion or questions.

A consent agenda is a board meeting practice that groups routine business and reports into one agenda item. The board can approve the consent agenda in one action rather than filing motions on each item separately. The board approved nine items, including the DIP and the CIPs. During onsite interviews, CCISD staff stated that they could not recall the board asking any questions during the last several years about the DIP or the CIPs before approving them. Several of the board members interviewed were uncertain as to what a DIP or a CIP is. Additionally, none of the board members were aware if the district had met the goals listed in the DIP and CIPs during the last few school years.

This lack of review of the DIP and CIPs inhibits the board from ensuring that the goals set by the administration will result in increased student academic achievement. The lack of review also limits the board's ability to determine whether the district's budget appropriates the necessary resources to meet the goals set in the DIP and CIP effectively.

Hire and Evaluate the Superintendent

The Texas Education Code, Section 21.354, states that the school board is required to conduct an annual written evaluation of the superintendent's performance. The code provides the following two options for the annual appraisal of a school district's superintendent:

- Option One – A district may use the commissioner's recommended appraisal process and performance criteria; or

- Option Two – A district may develop its own appraisal process and performance criteria in consultation with the district and campus-level committees, which the board then adopts.

The CCISD board elects to use the second option and conducts the superintendent's evaluation annually at the January board meeting using a TASB evaluation tool. The board conducted the most recent evaluation of the superintendent on January 17, 2017. This evaluation resulted in a two-year extension of the superintendent's contract, for a total of five years, with a 3.0 percent increase in salary. Although the CCISD board is complying with the Texas Education Code in its evaluation of the superintendent, the board is not engaged in the process. The evaluation form is a template and requires the board to insert the performance goals on which the board evaluates the superintendent. TASB's instructions for using the template state that the performance goals "should be developed annually by the board and superintendent at the beginning of the evaluation cycle, in relation to established district goals or other priorities identified by the board." However, the CCISD board has not developed goals annually for the superintendent. The board evaluates the superintendent using the same goals each year, and these goals predate the hiring of the superintendent. During onsite interviews, no board member could identify when the goals they are using were first developed or last updated.

Furthermore, the TASB evaluation form used by the CCISD board consists of two parts: Priority Performance Goals for the superintendent, and items that assess performance on ongoing management responsibilities of the superintendent. The priority performance goals use a letter scale of E – exceptional, P – proficient, and N – Needs Improvement. The board assesses the performance of management responsibilities using a number scale of one to five, with five being the best. Both parts of the evaluation form include comments sections for the board to detail the reasons for each rating. The board conducted the superintendent's school year 2016–17 evaluation in a closed session with a duration of 15 minutes. The superintendent received a perfect score on all areas of the evaluation, and the board included no written comments. During onsite interviews, the superintendent acknowledged that her evaluation process was an area that needed improvement. She indicated that the next group training with the board will focus on improving the CCISD's superintendent evaluation process.

Adopt a Budget and Set a Tax Rate

One of the primary responsibilities of a school board is to ensure that the district uses its resources wisely, efficiently, and effectively. Effective boards actively engage in the budget review and approval process to maintain financial accountability. However, the CCISD board often approves the budget and sets the district tax rate with little deliberation or discussion. The superintendent presents information to the board regarding the upcoming school year budget during the spring of each year. The board is also presented with detailed board information during an annual budget workshop meeting. The last of these workshops was held in July of 2017.

As part of the superintendent's report during board meetings from May to July, she presents information on preliminary revenue projections, expenditures, and enrollment projections. According to onsite interviews, at each board meeting, the superintendent's reports have a duration of 10 minutes to 15 minutes, and the board asks very few questions during her presentation.

The superintendent presented the budget for school year 2017–18 to the board, and the board approved the budget in an August 28, 2017, meeting attended by six of the seven board members. According to minutes from the board meeting, the budget and the tax rate were two of four items approved by the board during the meeting, which had a duration of 30 minutes. During onsite interviews, board members stated that they provide little feedback regarding the budget, and they trust that the superintendent will be efficient with district spending. No board member or CCISD staff could recall any changes ever made to the budget based on board feedback during the last five years. Additionally, no board members interviewed could describe the process that the superintendent and business manager apply to develop the budget.

Other Areas

Another example of the board's passive oversight and management of the district is its approach to preparing for board meetings. One of the most effective resources in planning a board meeting is developing a focused and concise agenda. The agenda is a list of activities that the board will discuss during the upcoming meeting. The agenda identifies the matters and issues that are before the board for review, discussion, or action. At CCISD, the superintendent's secretary, based on input from the superintendent and other staff, develops the agenda for each board meeting. The CCISD's board operating procedures state, "any board member may request that an item be placed on the agenda for board consideration by contacting the board president or the superintendent seven working days prior to the meeting." CCISD board members' years of service range from three years to eight years; however, according to onsite interviews, none of the current board members has ever added an item to any board agenda. CCISD staff determines the entire board agenda and, thus, what will be discussed and voted upon at upcoming board meetings.

Additionally, the board packet is available to board members electronically, or in hard copy upon request, on the Friday before the Monday board meeting. The board packet is the collection of materials the district provides to board members that provides information regarding the items listed on the meeting agenda. At CCISD, the board packet typically contains substantial district financial and budgetary data, individual campus reports, and any other information pertinent to decisions that board members will consider during the meeting. A review of the board packets for meetings held from September 2016 to February 2017 shows that the packets contain an average of 115 pages of documentation. During onsite interviews, five of the seven board members stated that they do not review the board agenda or the board packet until they arrive for the board meeting. Thus, most board members are not aware of what is on the agenda or what information the district has provided to them before the start of the meeting. Without a review a of the agenda and the board packets, board members are unprepared to discuss the items on the agenda, and may lack adequate information to make important decisions regarding the financial and academic direction of the district.

Without adequate active oversight, a school board cannot properly exercise its duty as trustees to ensure that the district is operating efficiently and effectively. When board members approve the decisions of management or the executive committee without engaging in deliberation, they effectively abdicate their responsibility of setting the goals and priorities for the district.

The CCISD board has a good working relationship with the superintendent, and they trust in her leadership and decision-making processes. However, one of the key responsibilities of board members is to hold the superintendent accountable for district operations. To maintain a high level of accountability, effective board members are engaged in the governing process, ask questions, and challenge the district's budgetary and planning decisions. Effective board members maintain this level of engagement regardless of how effective the performance of the superintendent has been in the past. No confirmation indicates that the superintendent will continue to perform at a level that satisfies the CCISD board nor that she will continue to remain employed in the district. Without active engagement, the board will have difficulty assessing the actual performance of superintendents and the district as a whole. Active board engagement and performance monitoring is crucial for CCISD, because the Texas Education Agency (TEA) rated three of the district's four campuses as Improvement Required in the state's academic accountability system for school year 2015–16.

One best practice that effective school boards use to increase member engagement and improve board effectiveness is a self-evaluation tool. Some of the benefits of self-evaluations include:

- enabling board members to reflect on their individual and collective behavior and performance;

- fostering open communication;

- improving decision making by enhancing a common understanding of philosophies and goals;

- resolving differences of opinion and challenging assumptions;

- providing insight into how and why decisions are reached;

- providing new board members an opportunity to understand board processes;

- identifying strengths and weaknesses of individual board member performance and the performance of the board as a whole;

- holding the board accountable in its role as representative of the public; and

- providing a starting point for effective goal setting and long-range planning.

TASB provides a tool, Effective Board Practices: An Inventory for School Boards, which examines how fully a school board embraces established characteristics of effectiveness. The inventory is a planning tool for boards that want to develop a higher level of effectiveness. The tool outlines effective board practices in the areas of planning and governance, oversight of management, board and superintendent team operations, and advocacy. The resource also contains a checklist for boards to use to determine how effectively they are operating in each of these four areas. The checklist specifically examines how the board is evaluating the superintendent, holding the district accountable for vision and goal setting, monitoring the budget, and communicating with the superintendent and with each other.

CCISD should conduct an annual board self-assessment to enhance accountability to district stakeholders.

The CCISD board should use a self-assessment tool similar to the TASB checklist to increase board member engagement. Individual board members and the superintendent should complete the checklist annually and then schedule a meeting for the board and superintendent to discuss the results, reach a consensus on the ratings of each item on the checklist, and determine the next steps the board will take to improve its performance.

As part of the self-assessment process, CCISD should do the following:
- develop a comprehensive superintendent evaluation process – The evaluation should include goal setting and the use of an aligned instrument. In developing this process, CCISD could use the TASB publication, *A New Board Member's Guide to Superintendent Evaluation*, as a resource. The publication recommends a three-part process in evaluating the superintendent. It includes an annual superintendent goal-setting activity, one formative evaluation during the evaluation process, and a summative evaluation that includes a written evaluation prepared collaboratively by the board and shared with the superintendent;

- ensure that all board members attend annual trainings regarding the school board's role in financial responsibility. All board members should comfortably understand the following:

- the basic elements of the state financial system;

- the basic statutorily prescribed tasks of the board as a fiscal steward;

- CCISD's budget development process; and

- CCISD's DIP and CIPs to ensure that budgetary decisions align with the district's strategic goals;

- review the board operating procedures related to adding items to an agenda;

- amend the board operating procedures to include a requirement that board members review the board agenda before the board meeting; and

- amend the board's operating procedures to require the board to conduct an annual self-assessment.

The district could implement this recommendation with existing resources.

CONTINUING EDUCATION (REC. 2)

CCISD's board members do not obtain all the training hours required by statute and board policy.

Effective governance of local school districts is the result of well-prepared board members. To accomplish this preparation, the state of Texas has enacted statutes that govern the initial training and continuing education of school board members. The Texas Administrative Code and the Texas Education Code contain training requirements for new board members. The Texas Administrative Code, Section 61.1, requires that first-year board members attend a local district orientation and an orientation to the Texas Education Code.

The local district orientation must be at least three hours in duration, and board members must attend the orientation within 60 days of a board member's election or appointment. The purpose of the local orientation is to familiarize new board members with local board policies and procedures, and district goals and priorities. The Texas Administrative Code specifies that a local orientation must address local district practices and a prescribed list of topics that includes:
- curriculum and instruction;

- business and finance operations;

- district operations;

- superintendent evaluation; and

- board member roles and responsibilities.

CCISD's Board Policy BBD (LEGAL), regarding board members' training and orientation, also states the local orientation requirements presented in the Texas Administrative Code, Section 61.1. Additionally, the school year 2016–17 CCISD board operating procedures manual states that new board members shall participate in a local orientation session and that this orientation will discuss meeting processes and parliamentary procedures.

However, according to interviews with all seven board members, CCISD does not conduct any local orientation of newly elected board members. No staff at CCISD are responsible for new board member orientation. When individuals are elected to the CCISD board, they attend a new member board orientation training conducted by Regional Education Service Center VI (Region 6). This training presents an overview of governance responsibilities as specified in law and meets the Texas Administrative Code requirement as an orientation to the Texas Education Code; however, this orientation does not satisfy the requirements for a local orientation.

CCISD tenured board members also do not consistently receive all the training hours required by the board and the State Board of Education (SBOE). The Texas Education Code, Section 11.159, requires board members to receive ongoing continuing education in accordance with rules set by SBOE. SBOE requires board members to obtain 10 hours of continuing education in their first year of service. Following the first year of service, members must obtain at least five hours of continuing education annually.

Figure 1–3 shows the number of continuing education training hours accumulated by CCISD board members from calendar years 2014 to 2016.

Figure 1–3 shows that only three of the seven current board members completed the required training during calendar years 2015 and 2016. Two board members did not complete the required five hours of annual training in 2015 and three

did not complete the required training hours in 2016. One board member did not complete the required hours in either year.

CCISD lacks a process for ensuring that board members receive the required training hours. The superintendent and the superintendent's secretary occasionally inform board members of available trainings. However, no formal training calendar or method enables board members to see all the trainings available to them. If board members are interested in attending trainings, they inform the superintendent's secretary, who handles any registration and travel. The superintendent's secretary also maintains a record of the continuing education training hours accumulated annually by each board member. However, the district does not have a process to compare board-training hours to statutory requirements. During onsite interviews, board members stated that they were unaware of the training requirements found in board policy or statute. CCISD staff interviewed were aware of the training requirements in Board Policy BBD (LEGAL), but they believed that the requirements are a best practice guide instead of mandated in statute.

Without a substantive local orientation, new board members are not informed fully about their roles and responsibilities. They do not have a familiarity with many of the issues they will face. A lack of understanding of key policies and processes can make it more difficult for new board members to participate fully in board deliberations. In addition, without consistent continuing education, tenured board members are not informed of industry best practices or legislative updates that affect school districts. This lack of continued education could hinder board members' understanding of their roles and responsibilities and impair their ability to oversee district operations effectively.

One best practice in continuing education for high-performing boards is a formal and thorough orientation for new members. According to the Center for Public Education's 2001 report *Eight Characteristics of Effective School Boards:*

FIGURE 1–3
CORRIGAN-CAMDEN ISD BOARD CONTINUING EDUCATION HOURS
CALENDAR YEARS 2014 TO 2016

YEAR	MEMBER 1	MEMBER 2	MEMBER 3 (1)	MEMBER 4	MEMBER 5	MEMBER 6	MEMBER 7
2014	12.5	7.75	12.75	10.5	10.15	11.0	9.0
2015	**3.0**	**0.0**	12.75	10.5	10.15	11.0	9.0
2016	9.0	**3.0**	9.0	9.0	**3.0**	9.0	**3.0**

NOTE: (1) Voters elected board member 3 in 2014. Voters elected all other board members before 2014.
SOURCE: Corrigan-Camden ISD, Superintendent's Office, September 2017.

Full Report, "Orientation workshops for new members are recommended soon after their election, as well as developing a policy statement on orientation that includes a commitment by the Governing Board and administrative staff to help new members learn board functions, policies, and procedures. Chief responsibility for orienting resides with the superintendent and board chair, and this work includes meetings with top administrative personnel to examine services, policies, and programs."

CCISD should modify the school board's continuing education training and orientation system to ensure that board members understand their responsibilities and the role, structure, and process of the governing board.

To accomplish this modification, the district should do the following:

- amend board policy and related operating procedures for a new member orientation to include the current officers of the school board, the superintendent, and members of the superintendent's cabinet. The operating procedures should provide guidelines for regulatory issues to be covered in addition to specific governance-related topics;

- develop a policy statement signed by each board member committing to meet the minimum number of continuing education hours required in the Texas Administrative Code, Section 61.1, and included in Board Policy BBD (LEGAL);

- develop an annual board training calendar identifying governance-related training topics and specific dates board members will be required to attend training; and

- distribute an annual survey to board members to determine their training preferences and use the results of the survey to build the board's training calendar for the year.

The district could implement this recommendation with existing resources.

BOARD ATTENDANCE (REC. 3)

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

One of the primary methods that school boards use to oversee and govern the management of a school district is to hold regular school board meetings. These meetings enable the board to remain informed regarding district activities and provide a public forum for the board to engage in district-related decision making, problem solving, planning, and evaluation. Board members must be present at board meetings to meet their duly elected obligations to be involved in board decisions and vote on board agenda items recommended by the superintendent.

However, CCISD's board members repeatedly are absent from school board meetings, and the board's operating procedures lack guidance regarding attendance at regular and special-called board meetings. The Legislative Budget Board's School Performance Review Team examined the minutes from 17 CCISD board meetings held from September 2016 to October 2017.

Figure 1–4 shows the number of board members present at each board meeting during this period. **Figure 1–4** shows that, in 30.0 percent of board meetings, one member was absent; 35.0 percent of meetings had two board members absent; and 35.0 percent had three members absent. None of the 17 meetings examined were attended by all seven board members.

FIGURE 1–4
CORRIGAN-CAMDEN ISD BOARD OF TRUSTEE BOARD MEETING ATTENDANCE
SEPTEMBER 2016 TO OCTOBER 2017

DATE	MEMBERS PRESENT (1)
September 19, 2016	5
October 17, 2016	5
November 14, 2016	4
December 12, 2016	4
January 17, 2017	6
February 20, 2017	5
March 6, 2017	6
April 20, 2017	4
May 15, 2017	5
June 26, 2017	6
July 25, 2017	6
August 21, 2017	4
August 28, 2017	6
September 18, 2017	5
September 25, 2017	4
October 2, 2017	5
October 16, 2017	4

NOTE: (1) Corrigan-Camden ISD has a seven-member board.
SOURCE: Corrigan-Camden ISD board minutes, September 2016 to October 2017.

CCISD's 2016–17 board operating procedures state that "any time four or more board members are gathered to discuss school district business, it is considered a meeting." Thus, 35.0 percent of all board meetings only met the minimum requirements for a quorum. CCISD's board operating procedures do not further address board meeting attendance. The district does develop an annual board calendar of all meetings which is distributed to all members in August.

During onsite interviews, CCISD staff consistently acknowledged that board attendance is a challenge. They indicated that many times staff were not certain whether a quorum of board members would be present until minutes before the meetings started.

Irregular board member attendance diminishes the members' ability to make informed decisions regarding the district. A lack of comprehensive understanding for the reason(s) the superintendent is making recommendations on board meeting agenda items decreases the board's ability to address those items effectively. This ability is particularly important for CCISD because the Texas Education Agency has designated each of the district's three campuses as Improvement Required within TEA's Accountability Ratings System at least once during the last three school years.

CCISD should amend the board's operating procedures to include a commitment of regular attendance for all board meetings.

The board and superintendent should develop content to amend the board's operating procedures to include a provision requiring all members to attend each board meeting unless extenuating circumstances exist. The amendment to the operating procedures should include the following actions:

- use the school's annual board calendar to enable members in advance to note which dates they might miss, especially during holidays and summer, and consider shifting the meeting dates based on early projected attendance. For example, if two members cannot attend the December meeting, the superintendent and board president should consider changing the date of the board meeting well in advance;

- develop a continual email reminder system that updates each member when another member cannot attend so that other members will make it a priority; and

- develop an annual presentation at the December board meeting that reports the attendance record for all board members during the previous calendar year.

The board president should post the review and approval of the amended operating procedures for a board meeting. The superintendent should ensure that the document is archived, placed on the board of trustees' webpage, and provided to appropriate staff.

The district could implement this recommendation with existing resources.

EVALUATION PROCESS FOR THE SUPERINTENDENT'S CABINET (REC. 4)

CCISD lacks a process to evaluate the performance of administrators in the superintendent's cabinet.

At CCISD, the superintendent's cabinet includes administrators who work collaboratively with the superintendent to make important governance decisions, and lead and coordinate school-improvement initiatives. The cabinet includes all campus principals and assistant principals, the instructional coordinator at the elementary campus, two athletic directors, transportation director, food service management company general manager, curriculum and programs director, technology director, and business manager. The superintendent meets with the cabinet once a month. These meetings are interactive and typically include sharing of information among departments and campuses. During cabinet meetings, administrators provide status reports for their respective functional areas. Administrators also discuss campus and department budgets; student attendance percentages at each campus; functional area issues or concerns affecting administration and operation of the campus; and preparation for board meetings.

The assistant principals report directly to their campus principals, and the instructional coordinators report to the curriculum and programs director. Additionally, the food service director is employed by the district's contracted food service management company and is not staff of the district. All other members of the cabinet report directly to the superintendent, who is responsible for their annual evaluation. The superintendent evaluates the three campus principals using the Texas Principal Evaluation and Support System (T-PESS). This new principal evaluation system for the state of Texas is intended to support principals in their professional development and help them improve as instructional leaders. Based on the review team's interviews

with CCISD principals and staff, the district has effectively implemented T-PESS. However, the other administrators that the superintendent oversees do not have a consistent and effective evaluation process, in violation of Board Policy DN (LOCAL).

Board Policy DN (LOCAL), regarding performance appraisals, states that all district staff shall be appraised periodically in the performance of their duties. The district's staff evaluation and appraisal system must be administered consistently with the following general principles:

- evaluation and appraisal ratings shall be based on the evaluation instrument and cumulative performance data gathered by supervisors throughout the year;

- each staff shall have at least one evaluative conference annually, except as otherwise provided by policy, to discuss the written evaluation throughout the year;

- appraisal records and forms, reports, correspondence, and memoranda may be placed in each staff's personnel records to document performance; and

- all staff shall receive copies of their annual written evaluations.

The superintendent stated that, during the appraisal process, staff complete a self-evaluation, and the superintendent completes the evaluation. The superintendent indicated that this process is intended to provide an opportunity to discuss any discrepancies in how staff view their performance compared to the superintendent's perspective.

During the review team's onsite interviews, administrators in the cabinet that are not campus principals indicated that the superintendent annually asks them to complete self-evaluation forms. CCISD uses the same form for all staff evaluations. However, CCISD administrators stated that completing this form was the extent of their evaluations. The superintendent did not provide formal feedback, nor did administrators attend any formal evaluation conferences. Some administrators indicated that the superintendent returned the self-evaluation forms to them; however, the forms contained no comments or additions from the superintendent. The review team also examined the staff files of several members of the superintendent's cabinet, and no evaluations were included in any of these files.

CCISD cabinet members also indicated that they do not have established goals and objectives for their evaluations. Instead, due to the small size of the district, they have informal discussions with the superintendent throughout the

year in which the superintendent provides feedback on their performances.

If a school district does not perform formal evaluations, staff could assume that their job performance is acceptable. The district could have difficulty dismissing staff for unsatisfactory performance if the supervisory staff has not informed staff of an issue. Often, this scenario increases the risk of allegations of disparate treatment or leads to staff grievances or lawsuits. In addition, without a periodic review of their job performance, the district is not providing staff the opportunity to receive input from their supervisors and improve their job performance. Additionally, the lack of a formal evaluation process for administrators could reduce accountability and negatively affect the oversight and management of the district.

Other Texas school districts have developed effective appraisal processes. San Antonio ISD has a well-defined appraisal system to evaluate staff job performance and identify areas of strength and concern for district staff. An appraisal system enables the district to account for all completed annual written appraisals. The district does not renew contracts until it verifies that each staff appraisal is filed in the appraisal system. San Antonio ISD also tasks its human resources (HR) staff with the duties of overseeing and monitoring the system, writing procedures for the staff appraisal system, and establishing timelines to evaluate each staff group annually.

Bastrop ISD also has instituted a process to ensure that staff are evaluated using performance-based and job-specific job descriptions. Each staff and manager performs a self-evaluation, using the job description form, for presentation to the manager. The staff and manager determine the final evaluation score. The manager uses the evaluation to pinpoint areas for improvement and further training and areas in which the staff has achieved competency or proficiency. The staff have positive opinions about the process.

CCISD should develop written procedures to manage the district's performance evaluation for administrators in accordance with board policies.

The district should assign one staff, with existing HR responsibilities, to develop procedures for CCISD's administrator appraisal process. With superintendent oversight and approval, this HR staff also should develop a new performance evaluation instrument specifically for district administrators that includes performance standards, key performance indicators, and an assessment of strengths and weaknesses along with potential professional

development opportunities. The superintendent and HR staff should ensure that the evaluation process requires collaborative goal setting at the outset, with a review of progress toward achieving the goals during a formal performance evaluation conference toward the end of the school year. Finally, when developing the procedures, the HR staff should ensure that the appraisal process meets all the requirements outlined in Board Policy DN (LOCAL).

The district could implement this recommendation with existing resources.

STRATEGIC PLANNING (REC. 5)

CCISD lacks a long-range strategic planning process to provide direction for the district.

Although the district has policies for developing required district and campus plans, no procedure or practice is in place to develop a long-range strategic plan from which annual required district and campus plans evolve.

CCISD develops numerous plans annually, including the following:

- district improvement plan;

- district targeted improvement plan;

- campus improvement plans;

- campus targeted improvement plans;

- technology plan;

- facility plan; and

- emergency operations plan.

The Texas Education Code, Section 11.253, requires all school district campuses to develop a campus improvement plan each year. For school year 2016–17, all three CCISD campuses developed campus-level targeted improvement plans (TIP) because TEA designated the campuses as Improvement Required within the state accountability system. Furthermore, the superintendent, with the assistance of the district-level planning and site-based decision-making committee, develops the district improvement plan (DIP). The Texas Education Code, Section 11.252, requires the DIP. Additionally, CCISD, as a district with an accountability rating of Improvement Required for school year 2016–17, developed a District Targeted Improvement Plan.

The CIP is a one-year plan that sets the campus educational objectives and notes how the campus will allocate resources

and time during the school year to meet the determined objectives. The campus TIP addresses all areas of insufficient performance for those campuses that TEA designated as Improvement Required. At the district level, the DIP is also a one-year plan, and its purpose is to guide district and campus staff in the improvement of student performance for all student groups to meet standards for the state student achievement indicators. The district specifically developed the district TIP to address areas of low performance identified by the state accountability system. The purpose of the various operational plans (facilities, technology, and emergency operations) is to establish a series of goals and strategies to improve the performance of these functions.

The closest the district comes to a districtwide strategic plan is the DIP. The DIP is critical in providing direction for the district; however, the district annually develops the plan and does not have a structure to provide long-range planning for systemic needs. CCISD's DIP focuses on instruction and includes goals and objectives for professional development, community involvement, teacher recruitment and retention, student safety, and student academic achievement. The DIP does not address transportation, food service, asset and risk management, and other areas of district operations. As a result, the district addresses items such as technology, facilities, and risk management in ancillary documents that are not integrated into a single comprehensive strategic plan.

In April 2016, the district engaged in a strategic planning process that occurred during three evening meetings. A strategic planning committee that consisted of district staff, board members, and representatives from the community led this process. The results of this strategic planning process included a district mission statement, district vision statement, and a set of strategic goals. The four strategic goals that the district developed from the strategic planning process include the following:

- maximize funding;

- recruit and retain high-quality staff;

- provide an engaging environment; and

- take a personal interest in students' lives.

These goals provide a notable starting point. However, the strategic goals that were developed are broad and are not linked to any measurable outcomes or funding sources. **Figure 1–5** shows a best practice model of a strategic planning process and compares it to the CCISD process.

FIGURE 1–5
STRATEGIC PLANNING BEST PRACTICE MODEL COMPARED TO CORRIGAN-CAMDEN ISD'S STRATEGIC PLANNING PROCESS

STEP	PURPOSE	PART OF CCISD STRATEGIC PLANNING PROCESS
Step 1: Vision Setting	The board, superintendent, and key stakeholders engage in a vision-setting process to determine what characteristics the district should have if it operated at the most optimal level.	Yes
Step 2: Mission and Goals	The board, superintendent and key stakeholders identify a mission and associate goals that, if accomplished, will bring the district closer to fulfilling its vision.	Yes
Step 3: Setting Priorities	The board prioritizes the district's most important goals to serve as the basis of the strategic plan.	Yes
Step 4: Identifying Barriers	The board, superintendent, and leadership team use data to identify the key barriers to accomplishing the goals.	No
Step 5: Identifying Resources	The administration links the budgeting process to the planning process to ensure that district goals and priorities are included in budget allocation.	No
Step 6: Strategy	The superintendent, administration, and key stakeholders—including parents, business leaders, civic organizations, and community groups—develop strategies to accomplish the goals by addressing the identified barriers, establishing timelines for completion, assigning accountability, identifying performance measures, and allocating resources.	No
Step 7: Consensus Building	The board, superintendent, and stakeholders build consensus, review the plan for viability, and approve the final document.	Yes
Step 8: Implementation and Monitoring	Persons or departments with assigned accountability implement the plan strategies and monitor progress against performance measures and use of allocated funds.	No
Step 9: Evaluation	The district evaluates the success of the plan, which performance measures were met, what goals were fulfilled, and what obstacles prevented success. The superintendent presents findings to the board.	No

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

Figure 1–5 shows that CCISD's strategic planning process did not do the following:

- establish objectives and performance measures for each goal to track progress;

- link the goals to funding sources to ensure that the goals are addressed in the district's budget allocation;

- assign individuals within the district to be responsible for monitoring the progress toward the goals; or

- establish a process to evaluate the plan in the future to determine if the goals were met.

Without a comprehensive strategic plan for three years to five years, the district likely will continue to react to administrative, operational, and academic challenges annually rather than plan systematically through a well-defined process. In addition, without an established and comprehensive strategic planning process, a district cannot articulate its direction based on consensus of long-term needs, use of resources, or stakeholder goals. Strategic plans enable school districts to overcome unforeseen events more quickly, allocate budget and human resources to achieve goals more efficiently, and establish accountability standards more effectively. For example, a drop in tax base due to an economic decline could affect the district's budget without proper planning.

Districts use different strategies to establish a comprehensive strategic planning process. For example, Tatum ISD uses a strategic planning and monitoring process called a Continuous Improvement Cycle that involves iterative and ongoing review and alignment of the district's strategic plan, program plans, and CIPs. All of these plans are developed and reviewed with significant input from all stakeholders including staff, teachers, parents, and community representatives. Each January, the superintendent presents a monitoring report to the board showing highlights, issues, and plans for each objective of the strategic plan that the district has adopted as the official DIP for that year.

Nacogdoches ISD also implemented a long-term strategic plan that includes a process to ensure that the district links

expenditures of federal and local funds to strategies outlined in its planning documents. District staff requesting expenditure of funds are required to include the goal, performance objective, and strategy from the respective plans on the purchase requisition. This process intentionally links the planning with the expenditure of funds and reduces the risk of the district spending funds for unnecessary items that do not progress the planning objectives.

CCISD should develop and implement a three-year to five-year comprehensive strategic plan with measureable objectives to ensure accountability and evaluate the district's effectiveness in meeting its students' needs.

The district should begin this process by building on work conducted in the 2016 strategic planning meeting. CCISD should expand on the process using the same strategic planning committee that developed the previous mission, vision, and goals. The planning committee should take the four goals previously identified and develop a detailed action plan for accomplishing each goal. This action plan will consist of measurable objectives and strategies for each goal. The district should also ensure that it develops the major goals, and detailed action plans for these goals, for functional areas that are not included in the DIP such as facilities, technology, risk management, and safety and security. This development ensures that the overall strategic plan incorporates all the district's planning documents.

In addition, the action plan should identify the resources required to accomplish the goals, including funding sources. The district should also indicate staff assigned to achieve the goals within an established timeline. The typical period for goals established in a long-term strategic plan is three years to five years. The assigned staff should report periodically to the board on the progress of accomplishing each goal.

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

This recommendation could be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 1. DISTRICT LEADERSHIP, ORGANIZATION, AND MANAGEMENT							
1. Conduct an annual board self-assessment to enhance accountability to district stakeholders.	$0	$0	$0	$0	$0	$0	$0
2. Modify the school board's continuing education training and orientation system to ensure that board members understand their responsibilities and the role, structure, and process of the governing board.	$0	$0	$0	$0	$0	$0	$0
3. Amend the board's operating procedures to include a commitment of regular attendance for all board meetings.	$0	$0	$0	$0	$0	$0	$0
4. Develop written procedures to manage the district's performance evaluation for administrators in accordance with board policies.	$0	$0	$0	$0	$0	$0	$0
5. Develop and implement a three-year to five-year comprehensive strategic plan with measureable objectives to ensure accountability and evaluate the district's effectiveness in meeting its students' needs.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 2. EDUCATIONAL SERVICE DELIVERY

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

Managing educational services is dependent on a district's organizational structure. Larger districts typically have multiple staff dedicated to educational functions, and smaller districts have staff assigned to multiple education-related tasks. 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, an educational program must evaluate student achievement across all content areas, grade levels, and demographic groups.

Corrigan-Camden Independent School District (CCISD) includes one elementary school, one junior high school, one high school, and a disciplinary alternative education program (DAEP). CCISD combined its former primary and elementary campuses into one elementary campus during school year 2016–17. The district enrollment for school year 2016–17 was 917 students.

Figure 2–1 shows the demographics of CCISD compared to state averages. During school year 2016–17, the student population was 38.3 percent Hispanic, 33.3 percent White, 26.4 percent African American, 1.6 percent two or more races, and 0.3 percent American Indian. Approximately 74.5 percent of students were economically disadvantaged, greater than the state average of 59.0 percent. The district identified 14.2 percent of students as English Language Learners (ELL), which was less than the state average of 18.9 percent. The district also identified approximately 56.5 percent of students as at risk, which was greater than the state average of 50.3 percent.

FIGURE 2–1
CORRIGAN-CAMDEN ISD STUDENT DEMOGRAPHICS SCHOOL YEAR 2016–17

STUDENTS	DISTRICT	STATE
Hispanic	38.3%	52.2%
Asian	0.0%	4.0%
White	33.3%	28.5%
Two or More Races	1.6%	2.1%
African American	26.4%	12.6%
American Indian	0.3%	0.4%
Pacific Islander	0.0%	0.1%
Economically Disadvantaged	74.5%	59.0%
English Language Learners	14.2%	18.9%
At Risk	56.5%	50.3%

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2016–17.

Figure 2–2 shows the state accountability ratings for CCISD and its campuses for school years 2013–14 to 2016–17. During school year 2015–16, the Texas Education Agency (TEA) rated the district Improvement Required. During school year 2014–15, the junior high campus received an Improvement Required rating. During school year 2015–16, TEA rated the high school and elementary school campuses Improvement Required. During school year 2016–17, TEA rated the elementary campus Improvement Required.

Figure 2–3 shows the CCISD educational service delivery organization. CCISD's organizational structure for educational service delivery shows that the curriculum and programs director, all campus principals, and the DAEP supervisor report directly to the superintendent. The elementary instructional coordinator and the Response to Intervention (RTI) teacher report to the principal of the elementary campus, and the student services coordinator reports to the principal of the high school campus.

For special education, CCISD participates in the Polk County Special Services Cooperative (PCSSC) with Big Sandy, Leggett, and Onalaska ISDs. Participating districts established a shared services agreement, and CCISD serves as the fiscal agent for the cooperative. PCSSC employs the director of special education, who oversees CCISD special education services and contracted staff and reports to the superintendents of all participating districts. CCISD special education teachers and paraprofessionals

FIGURE 2–2
CORRIGAN-CAMDEN ISD STATE ACCOUNTABILITY RATINGS
**SCHOOL YEARS 2013–14 TO 2016–17**

CAMPUS	2013–14	2014–15	2015–16	2016–17
Districtwide	Met Standard	Met Standard	Improvement Required	Met Standard
High	Met Standard	Met Standard	Improvement Required	Met Standard
Junior High	Met Standard	Improvement Required	Met Standard	Met Standard
Elementary	Met Standard (1)	Met Standard (2)	Improvement Required (2)	Improvement Required

NOTES:
(1)   For school year 2013–14, Corrigan-Camden Primary and Corrigan-Camden Elementary were separate campuses, both of which met standard.
(2)   For school years 2014–15 and 2015–16, Corrigan-Camden Primary and Corrigan-Camden Elementary were reported as paired campuses.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2013–14 to 2016–17.

FIGURE 2–3
CORRIGAN-CAMDEN ISD EDUCATIONAL SERVICE DELIVERY ORGANIZATION
SCHOOL YEAR 2017–18
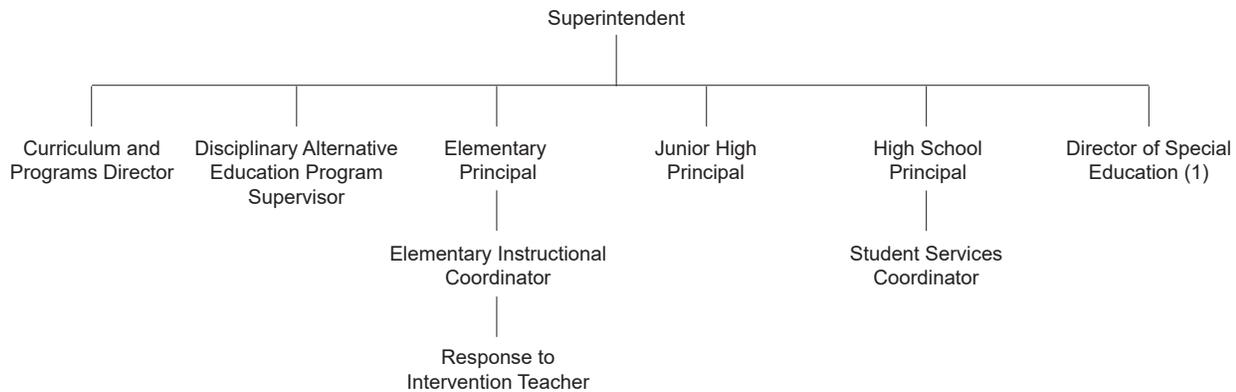
NOTE: (1) Polk County Special Services Cooperative employs the director of special education.
SOURCES: Legislative Budget Board School Performance Review Team, October 2017; Corrigan-Camden ISD, September 2017.

teach and support students in special education through inclusion and pullout services. For instructional technology, teachers request hardware and software from campus principals, or they can apply for instructional technology grants from the district.

FINDINGS

♦ Corrigan-Camden ISD lacks an effective process for curriculum adoption, review, and revision.

♦ Corrigan-Camden ISD has not consistently implemented districtwide procedures to ensure effective, consistent interventions for struggling students in all grade levels.

♦ Corrigan-Camden ISD does not offer a comprehensive program to meet the instructional needs of students identified as English Language Learners.

♦ Corrigan-Camden ISD's gifted and talented program lacks oversight, procedures, and curriculum, resulting in services that are inconsistent and low participation rates.

♦ Corrigan-Camden ISD's organization and reporting structure do not adequately support instructional decision making and management, and the district has not evaluated staffing levels and assignments to determine if services are sufficient to meet student needs.

♦ Corrigan-Camden ISD has not maximized mentoring and support for beginning teachers in the district.

♦ Corrigan-Camden ISD lacks an effective process to evaluate and improve student programs.

RECOMMENDATIONS

♦ **Recommendation 6: Develop and implement a comprehensive curriculum management plan.**

♦ **Recommendation 7: Implement a Response to Intervention process districtwide with fidelity to the model and regularly evaluate student intervention programs for effectiveness.**

♦ **Recommendation 8: Develop and implement a process for continuous evaluation of the district's English as a Second Language program to ensure that instructional delivery effectively meets the needs of English Language Learner students.**

♦ **Recommendation 9: Develop a long-term plan for advanced academics and districtwide procedures for gifted and talented services, schedules, and curriculum.**

♦ **Recommendation 10: Assess the quality of services provided by the district, and develop a plan to align instructional services with industry staffing standards to best support student need.**

♦ **Recommendation 11: Develop a teacher-mentoring program that includes specific guidelines and timelines for providing support to beginning teachers.**

♦ **Recommendation 12: Develop and implement a formal procedure for the evaluation of the district's programs and initiatives.**

DETAILED FINDINGS

CURRICULUM MANAGEMENT PLAN (REC. 6)

CCISD lacks an effective process for curriculum adoption, review, and revision.

The district uses the Texas Essential Knowledge and Skills (TEKS) Resource System as its curriculum management system. District staff reported that CCISD selected this system at the advice of staff at Regional Education Service Center VI (Region 6), and because it is a small district without the resources to write its own curriculum. CCISD began using the TEKS Resource System as its curriculum management system in August 2013, and previously used the Texas Education Service Center Curriculum Collaborative's CSCOPE system. However, during onsite interviews, staff indicated that the district began using the system with fidelity during school year 2016–17. During teacher in-service

professional development days for school year 2017–18, CCISD focused on the TEKS Resource System, and teachers reported a strong understanding of the system's major components. District and campus administrators monitor the use of the system in all district classrooms through reviews of lesson plans and classroom walk-throughs. However, the district does not evaluate its effectiveness.

Although CCISD uses the TEKS Resource System as its curriculum management system, the district has gaps in the curriculum decision-making process. During the Legislative Budget Board's School Performance Review Team's onsite visit, district staff indicated that CCISD has no curriculum management plan to guide it. Effective curriculum management plans are comprehensive documents that outline the processes used to implement critical elements of curriculum and instruction. The district does not have a formal process to revise, align, or evaluate its curriculum and does not provide instructional guides. The district also has no written procedures detailing who is involved in the curriculum process, what actions they should take, nor a specific timeline for review and revision. Board of Trustees members reported little knowledge about curriculum and instruction in the district, and the board is not involved in curricular decision making.

During onsite interviews, CCISD staff also indicated that the district has an informal process for selecting curricula and instructional resources to supplement curriculum available through the TEKS Resource System. Teachers can request new curriculum resources or an instructional program from a campus principal. Before receiving approval, staff must explain the student need that the resources could meet. A campus principal may then authorize a teacher to pilot the program or resource for a period and document the results. If the teacher indicates that the pilot is successful, the principal might then ask the teacher to conduct basic research about the program before final approval. However, district administrators and campus principals do not provide guidelines for selecting instructional programs supported by a strong research base. Additionally, campus administrators authorize pilots of programs without significant evidence-based effectiveness. The process for requesting instructional technology is informal and teacher-driven, and the district does not plan for or align instructional technology with district curriculum.

For example, the district's dyslexia program uses the Herman Method, a curriculum that teaches reading in small groups. The curriculum provides instruction in phonemic awareness,

phonics, fluency, vocabulary, reading comprehension, spelling, and writing. However, the What Works Clearinghouse (WWC), established by the U.S. Department of Education's Institute of Education Sciences, reported that no studies of the Herman Method aligned with WWC's protocols or met structural standards. WWC was unable to draw any research-based conclusions about the effectiveness of the program for students with dyslexia. Additionally, CCISD staff selected curricula used for student interventions and an instructional program used for English as a Second Language (ESL) services without any research confirming that the resources demonstrated evidence-based effectiveness.

Without a curriculum management plan, the district may struggle to make decisions about curriculum and instruction that are strategic or targeted to meet students' instructional needs. If the district continues to operate without a curriculum management plan, the roles of key stakeholders may not be clear, professional development may not be aligned to curriculum, and the curricular and instructional resources may not be maximized to accelerate student performance. Additionally, failure to implement a system or structure to provide formative feedback to teachers about their instructional practices could result in continued low student performance. CCISD's use of nonevidence-based curriculum also could contribute to low student academic performance.

Figure 2–4 shows CCISD's student performance on the State of Texas Assessments of Academic Readiness (STAAR) and STAAR End-of-Course (EOC) exams. CCISD students scored less than state and Region 6 averages on the STAAR in all core subjects during school years 2015–16 and 2016–17. CCISD also scored less than the state and Region 6 in percentages of students who passed the STAAR EOC exams for English I, English II, and Biology during school year 2015–16. CCISD students scored greater than state and Region 6 averages in percentages of students who passed STAAR EOC exams for Algebra I and U.S. History.

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." The Alaska Department of Education and the Montana Office of

FIGURE 2–4
CORRIGAN-CAMDEN ISD STATE OF TEXAS ASSESSMENTS OF ACADEMIC READINESS (STAAR) RESULTS FOR ALL GRADES AND END-OF-COURSE EXAMS COMPARED TO REGION 6 AND STATE AVERAGES
SCHOOL YEARS 2015–16 AND 2016–17

CORE SUBJECT	STATE		REGION 6 (4)		CORRIGAN-CAMDEN ISD	
	2015–16	2016–17	2015–16	2016–17	2015–16	2016–17
STAAR (1)						
Two or More Subjects	45%	48%	47%	50%	**18%**	**28%**
Reading	46%	48%	48%	50%	**30%**	**28%**
Math	43%	48%	45%	50%	**18%**	**30%**
Writing	41%	38%	42%	37%	**17%**	**11%**
Science	47%	52%	50%	55%	**14%**	**27%**
Social Studies	47%	51%	50%	54%	**11%**	**47%**
STAAR End-of-Course (2)						
English I	65%	64%	65%	64%	**51%**	**53%**
English II	67%	66%	69%	66%	**66%**	**52%**
Algebra I	78%	82%	77%	82%	**52%**	**90%**
Biology	87%	86%	88%	87%	**67%**	**79%**
U.S. History	91%	91%	90%	92%	**(3)**	**95%**

NOTES:
(1)   Scores refer to percentage at meets grade level, all grades
(2)   Scores refer to percentage at approaches grade level or greater.
(3)   Numbers less than five have not been cited pursuant to the U.S. Code, Title 20, Section 1232g, known as the Family Educational Rights and Privacy Act, and in accordance with the Texas Education Agency, Operating Procedure 10-03.
(4)   Region 6=Regional Education Service Center VI.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2015–16 and 2016–17.

Public Instruction offer models for curriculum development, review, and revision, and guidance for implementation and evaluation of curriculum. At the district level, other examples of districts with effective curricula planning are Texarkana ISD and Ozark Public School District in Ozark, Missouri. Ozark Public School District's planning process for curriculum is tied closely to program evaluation and contains provisions for annual review and revision on a six-year cycle.

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.

CCISD should develop and implement a comprehensive curriculum management plan.

The comprehensive curriculum management plan should include written standard operating procedures (SOP) to ensure transparency and to standardize the process for managing curriculum. To develop a curriculum management plan with written SOPs, the superintendent should establish a district curriculum committee. The committee should include the curriculum and programs director, elementary instructional coordinator, and administrators and teachers from the elementary, junior high, and high school campuses. The committee should evaluate the process that exists for the TEKS Resource System, all district curricula, instructional materials, and instructional technology. The committee should identify best practices in curriculum management to adopt in CCISD. The committee should review existing curriculum development and management plans from professional organizations and other districts. Collectively, the members of the committee should develop and describe formal steps and a timeline for a district process of curriculum adoption, review, and revision. When complete, the committee should present the new curriculum management plan to the superintendent and the board.

The district could implement this recommendation with existing resources.

RESPONSE TO INTERVENTION (REC. 7)

CCISD has not consistently implemented districtwide procedures to ensure effective, consistent interventions for struggling students in all grade levels.

CCISD employs the response to intervention (RTI) process to provide early identification and support of students with learning and behavior needs. In effective districts, the RTI process is a three-tier model of campus supports that uses research-based academic and behavioral interventions. Tier I is high-quality instruction for all students, screening, and whole-class or group interventions. Tier II focuses on small-group instruction and more intense and whole-class instruction. Tier III provides more intense interventions and a comprehensive evaluation to determine whether students should receive special education services. In RTI, the focus includes the screening and ongoing monitoring, which includes analyzing the documented student data to determine if students are progressing.

However, CCISD does not oversee the implementation of the RTI process, and each campus implements RTI differently. At the elementary school level, the campus schedule includes a 45-minute intervention period. Teachers work with Tier I and Tier II students in the classroom, and Tier III students receive pullout services four days a week. Tier III services are primarily reading interventions, and a small number of students receive writing interventions. The daily intervention period does not include math interventions.

Students in kindergarten to grade two work with a certified RTI teacher. Her duties include teaching daily intervention classes, communicating with families, and advising classroom teachers about intervention materials and RTI documentation. Students in grades three to five work with two paraprofessionals. The elementary instructional coordinator coordinates with the paraprofessionals. The RTI teacher is not involved with the RTI program in these upper elementary grades.

The elementary school campus has an RTI committee, which consists of one teacher per grade level, the elementary instructional coordinator, the RTI teacher, the assistant principal, and the principal. The campus RTI committee selects students to receive Tier III services based on classroom observations, reading assessments, and other assessment data. Group sizes are limited to three to four students; therefore, the committee limits Tier III services to students with the greatest need. Teachers keep RTI logs for each student to document what skill the student is working on, classroom setting, success, and time. However, CCISD does not require a specific form of progress monitoring, and the district has limited oversight of RTI documentation.

CCISD staff described RTI at the secondary level as minimal or nonexistent. The high school and junior high

school campuses have a daily intervention period called 2.5, which takes place between periods two and three of the school day. At the junior high campus, students participate in period 2.5 for approximately 40 minutes a day. During school year 2017–18, the junior high campus implemented a new elective course, Adventures in Learning, for students in grades six and eight. The district does not offer Adventures in Learning to students in grade seven, which the junior high principal indicated was because not enough staff are available. This course covers a variety of subjects, including high-interest topics such as parks and wildlife. The campus also uses this course to reteach concepts or administer unit assessments. One of the two course instructors is a certified teacher. Staff described using videos about core subject content because a core subject teacher does not teach the content. The junior high campus does not require lesson plans for the 2.5 tutorial period, and teachers do not use approved curricula to provide interventions or extend mastered concepts.

At the high school campus, students also participate in a daily 2.5 tutorial period. Administrators assign students who score less than 75 in a course at the three-week or six-week reporting period to a core area teacher, and students that participate on the athletic teams report to the library to work with the coaches. Staff described the 2.5 tutorial period as informal, with some students completing work, some receiving tutoring support, and others having no work. Staff may assign work to students who do not bring assignments to the tutorial period.

During school year 2016–17, Region 6 conducted a targeted review of CCISD's educational services and observed large numbers of students off-task during the 2.5 tutorial period at each campus; Region 6 reviewers did not observe effective interventions taking place. District and campus staff discussed making adjustments to the 2.5 tutorial period, such as regrouping students; however, the LBB school review team did not find evidence that the district effectively adjusted the rigor of the tutorial period in response to the Region 6 review's findings.

The district has not overseen implementation of a standard RTI process effectively. As a result, each of the three campuses in CCISD has purchased various programs to provide academic interventions and supplemental supports to students who are scoring low on assessments. The district does not have a systematic process to determine the outcomes or efficacy of these intervention programs.

During the review team's onsite interviews, staff indicated that CCISD lacks a process to survey teachers and students regarding what intervention programs work best. The district also does not perform any data analysis to see how the use of these programs has affected state test scores or student academic achievement. Additionally, CCISD lacks written procedures detailing how each program or intervention is applied as part of the district's overall plan for the delivery of instruction.

As shown in **Figure 2–4**, CCISD struggles with student academic performance on the STAAR and STAAR End-of-Course exams. Because the district has not implemented RTI adequately or with fidelity, staff cannot ensure that students are receiving the instruction and supplemental supports they need to be successful. Failure to implement a consistent and appropriate RTI process may continue to result in poor academic performance, especially for students who are struggling or who are at risk of poor performance.

Effective RTI models focus on improving student-learning outcomes through data-based decision making for screening, progress monitoring, and implementation of multilevel prevention systems of supports. The National Center on Response to Intervention states that rigorous implementation of RTI includes a combination of high-quality, culturally and linguistically responsive instruction, assessment, and evidence-based intervention. Implemented correctly, a comprehensive RTI framework will improve identification of learning and behavioral problems, enhance instructional quality, and provide all students with the best opportunities to achieve academic success. A district establishes an RTI framework at the district level in collaboration with campus staff. District-level procedures guide, support, and monitor campus implementation.

Implementing RTI is a process that involves reflection and research, collaborative planning by district and campus teams, continuous monitoring and evaluation, and evidence of strategy refinement based on evidence. A school district participates in a four-step process with strong documentation of participation and completion of each stage. The four stages include the following:
- exploring and adopting – During this stage, sites assess their needs, gather information about the RTI framework, determine if a match exists between the needs of the site and the expected outcomes of RTI, and achieve a consensus among key stakeholders to put RTI in place;

- planning – At this stage sites prepare for implementation, data are gathered and reviewed, an action plan is developed, and measureable benchmarks of progress are defined;

- implementing – Full operation of RTI occurs when the framework is embraced by practitioners and integrated into all schools and classrooms with integrity. RTI becomes woven into the culture of the school; staff is skilled in data-based decision making; instruction is evidence-based and culturally responsive; administrators and teacher leaders support and facilitate new practices, procedures, and processes; the community understands and supports the framework; and the expected outcomes are clear and incorporated into district and campus planning; and

- continuously improving – During this stage, the district and campuses evaluate their progress, adjust their practices based on evaluation, and monitor changes to ensure sustainability of RTI.

Other districts can serve as a model for implementing RTI. Midland ISD has developed a detailed RTI district plan that provides guidance to district and school staff. The plan also fully describes the RTI program so that parents can understand the program and how it supports all aspects of instruction and behavior. The Midland ISD RTI district plan is available to view on its website.

CCISD should implement an RTI process districtwide with fidelity to the model and regularly evaluate student intervention programs for effectiveness.

To begin developing a more effective RTI process, CCISD should establish district-level and campus-level RTI teams. These teams should consist of selected district and campus administrators, teachers, RTI staff, and counselors. The teams should establish long-term and short-term goals for establishing a comprehensive RTI process to use at all campuses.

The teams should research successful RTI programs at other districts and seek the assistance of Region 6 to help establish these goals. As part of developing this process, CCISD should define the roles and responsibilities of staff regarding RTI. The district should develop processes, systems, and forms to collect, document, and analyze student outcomes. The district should provide staff with ongoing training and professional development regarding the district RTI process.

The superintendent should designate staff to monitor regularly the consistent implementation of the revised RTI process at all campuses.

When these steps are in place, CCISD should develop and implement a process to evaluate the district's intervention programs and determine if the district should incorporate them into the district's new RTI process. The RTI teams should prioritize implemented intervention programs and develop evaluation plans for each program. Each evaluation plan should include the following components:

- stated purpose;

- evaluation questions;

- data sources and data collection procedures;

- established timeline;

- methodology for analysis; and

- reporting structure and requirements.

The district should publish an annual report summarizing the evaluations it performs to provide data to stakeholders, including the board, staff, and community. The teams should present the campus-level and district-level RTI processes to the board.

The district could implement this recommendation with existing resources.

ENGLISH LANGUAGE LEARNERS (REC. 8)

CCISD does not offer a comprehensive program to meet the instructional needs of students identified as English Language Learners (ELL).

During school year 2016–17, CCISD identified 14.2 percent of its students as ELL. The Texas Education Code, Section 89.1203, defines an ELL student as "a person who is in the process of acquiring English and has another language as the first native language." CCISD identifies ELL students through home language surveys completed at the time of registration. **Figure 2–5** shows the population of ELL students at CCISD from school years 2014–15 to 2016–17. The Texas Education Code, Section 29.053 (3), requires each district to offer a bilingual education or special language program when the district has 20 or more students of limited English proficiency (LEP) in any language classification enrolled in the same grade. CCISD has fewer than the minimum number of LEP students in each language classification and grade, and the district does not provide bilingual services.

FIGURE 2–5
CORRIGAN-CAMDEN ISD ENGLISH LANGUAGE LEARNER STUDENTS SCHOOL YEAR 2014–15 TO 2016–17

YEAR	ENGLISH LANGUAGE LEARNER STUDENTS	PERCENTAGE OF TOTAL DISTRICT STUDENT POPULATION
2014–15	117	11.8%
2015–16	124	12.8%
2016–17	130	14.2%

SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2014–15 to 2016–17.

CCISD's school year 2016–17 district improvement plan (DIP) contains one strategy related to the English as a Second Language (ESL) program. The goal of an ESL program is to provide ELL students with instructional support that will enable them to participate fully in their educational experience in schools and in their communities. The ESL-related strategy in the DIP states that the district will provide staff with professional development to utilize effectively ESL pullout instruction at all campuses. The DIP strategy indicated that the frequency of professional development would be each six weeks, and the ESL coordinator would be responsible for the strategy. However, at the time of the onsite review, the district did not provide documentation of ongoing ESL professional development, did not have an ESL coordinator or similar staff position, and did not provide pullout instruction on all campuses. District staff have not been tasked effectively with implementing and monitoring the ESL strategy within the DIP. When the review team asked the superintendent and district staff about ESL planning, they indicated no long-term district plans for the ESL program, and they did not reference the DIP.

Each campus has an ESL contact who also serves as the Language Proficiency Assessment Committee coordinator. These duties are carried out by a counselor for the elementary campus, a department head teacher for the junior high campus, and the student services coordinator at the high school campus.

CCISD instituted a program in which district English and language arts teachers receive certifications to work with ELL students. These teachers provide instruction to all ELL students and must include English Language Proficiency Standards in their lesson plans. However, the district provides limited training and oversight to ensure that staff consistently implement research-based strategies for working with ELL students.

A small number of ELL students in the district are recent immigrants with little or no English proficiency. District and campus staff indicated that the only support these students receive at the secondary level is access to Rosetta Stone, a language software program, during the 2.5 tutorial period. At the high school, staff indicated a plan to have students work with Rosetta Stone, but this plan had not been implemented at the time of the onsite review. At the elementary school campus, a Spanish-speaking RTI teacher selects students to work with Rosetta Stone and other supports during the 2.5 intervention period. During onsite interviews, CCISD staff indicated that paraprofessionals at each campus work with non-English-speaking students, but that these students are not their primary job responsibilities. District and campus staff expressed concern that the support provided by the district did not meet student needs. Nonbilingual teachers communicate with students through other bilingual students, paraprofessionals, or administrative support staff.

Neither the curriculum and programs director, nor other district staff, have evaluated the effectiveness of the ESL program at CCISD.

The performance of CCISD's ELL students on state assessments is lower than that of the overall student population in all categories. **Figure 2–6** shows school year 2016–17 STAAR performance results for ELL students compared to CCISD's overall student population.

TEA provides resources, tools, and guidance documents for the delivery of ESL services. The district can obtain much of this information from the TEA website (www.tea.texas.gov). Additionally, TEA has another website specific to ELL education (elltx.org). The ELL education website contains more concise and clearly stated guidance for meeting the educational needs of ELLs, students in bilingual education programs, and students receiving ESL services. It includes resources such as the Language Proficiency Assessment Committee Framework Manual, Limited English Proficient Training Flowchart, English Language Learner Instructional Accommodations Checklist, and additional resources for accessing data and implementing programs for ELL students.

The Office for Improving Second Language Achievement, a research program at Texas A&M University – Corpus Christi, also provides resources for teachers and administrators administering ESL and bilingual programs. Its 2006 publication, Best Practices for English Language

FIGURE 2–6
CORRIGAN-CAMDEN ISD (CCISD) STATE OF TEXAS ASSESSMENTS OF ACADEMIC READINESS ENGLISH LANGUAGE LEARNER (ELL) STUDENT PERFORMANCE SCHOOL YEAR 2016–17

METRIC	ALL CCISD STUDENTS	ELL STUDENTS
Approaches Grade Level or Above, All Subjects	59%	**42%**
Approaches Grade Level or Above, Reading	57%	**36%**
Approaches Grade Level or Above, Mathematics	66%	**53%**
Meets Grade Level, Two or More Subjects	28%	**(1)**
Meets Grade Level, Reading	28%	**11%**
Meets Grade Level, Mathematics	30%	**20%**
Met or Exceeded Progress, All Subjects	53%	**41%**
Met or Exceeded Progress, Reading	47%	**35%**
Met or Exceeded Progress, Mathematics	58%	**47%**

NOTE: Numbers less than five have not been cited pursuant to the Family Educational Rights and Privacy Act, 34 U.S. Code of Federal Regulations, Part 99.1, and Texas Education Agency Operating Procedure 10-03.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2016–17.

Learners, profiles programs, policies, and instructional practices of schools in Texas that have demonstrated success with ELLs based on state and national assessments.

CCISD should develop and implement a process for continuous evaluation of the district's ESL program to ensure that instructional delivery effectively meets the needs of ELL students.

The superintendent or superintendent's designee should convene a committee of campus administrators, the curriculum and programs director, and teachers. The committee should analyze CCISD's ESL program and implementation of DIP strategies. The committee should then develop and implement guidelines for the ESL program, including the services the program will provide and expectations for ESL teachers in the classroom. The committee should then evaluate the district's available ESL resources and determine which resources are useful and which resources the district still needs. Finally, the committee should compile and present its recommendations for improving the ESL program to the superintendent and the board. The committee should develop a schedule for

ongoing evaluation of the ESL program. The committee should communicate its findings with the district improvement team, so that recommended goals, strategies, and activities for ESL can be incorporated into DIPs.

In completing this process, the district committee also should obtain assistance from an outside resource such as Region 6. The bilingual/ESL team at Region 6 can provide assistance in ESL program administration, developing effective language programs, guidance on instructional strategies for ESL students, curriculum modifications for ESL programs, and additional services as needed. These services are included in the existing fees that the district pays Region 6 for Bilingual/ESL Contracted Services.

The district could implement this recommendation with existing resources.

ADVANCED ACADEMICS (REC. 9)

CCISD's gifted and talented (G/T) program lacks oversight, procedures, and curriculum, resulting in services that are inconsistent and low participation rates.

Figure 2–7 shows the percentage of students identified as G/T in CCISD compared to Region 6 districts and state averages for school years 2014–15 to 2016–17. The rate of identification for G/T students in CCISD is less than those of Region 6 and the state.

The National Association for Gifted Children (NAGC) notes that school districts typically identify from 5.0 percent to 7.0 percent of enrolled students as G/T. By this measure, CCISD's rate of identification is also less than national standards. CCISD staff consulted with local districts and Region 6 to revise the screening and identification process for G/T students during school year 2016–17. Staff indicated to the review team that the revised process effectively

FIGURE 2–7
CORRIGAN-CAMDEN ISD PERCENTAGE OF ENROLLED STUDENTS IDENTIFIED FOR GIFTED AND TALENTED EDUCATION COMPARED TO REGIONAL AND STATE RATES SCHOOL YEARS 2014–15 TO 2016–17

YEAR	CCISD	REGION 6	STATE
2014–15	**4.3%**	6.8%	7.6%
2015–16	**3.8%**	7.7%	7.7%
2016–17	**3.8%**	7.1%	7.8%

NOTE: CCISD=Corrigan-Camden Independent School District; Region 6=Regional Education Service Center VI.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2014–15 to 2016–17.

identified G/T students. However, the district was unable to validate this assertion based on data.

The curriculum and programs director coordinates G/T at the district level. Each campus has a teacher who has completed the 30 hours of initial G/T training and six-hour annual update trainings required to work with G/T students. These teachers receive an annual stipend for providing G/T services in addition to their primary assignments.

At the elementary level, students receive pullout services to work on projects or attend field trips. District staff stated that the elementary G/T teacher meets with students twice a month on Fridays. At the secondary level, staff indicated that G/T students work with a G/T teacher during the daily 2.5 tutorial period. However, the district does not require lesson plans for G/T services and does not monitor the services provided.

At the high school campus, advanced learners, including G/T students, can also enroll in dual-credit courses at Angelina College, Texas Virtual School online classes, and honors classes. The district does not offer advanced placement and pre-advanced placement courses.

Interviews with district and campus staff indicated a perceived improvement in the G/T program in recent years. However, staff also indicated that G/T services remain inconsistent and lack sufficient district oversight and support. The curriculum and programs director does not monitor the scheduling of services and does not evaluate the program's effectiveness. Additionally, the district has

not provided G/T teachers with research-based G/T curriculum or district procedures for the program.

Differentiation for G/T students and advanced learners is limited. During onsite interviews, some staff indicated that they have received outside training on differentiation for advanced learners. However, the district has not provided professional development or expectations for general education teachers that work with G/T students. Region 6 conducted an educational review of the district in March 2017, which included extensive classroom observation. Region 6 staff reported that the percentage of observed classrooms that provided differentiation for students who mastered content was 9.0 percent at the elementary campus, 17.0 percent at the junior high campus, and 0.0 percent at the high school campus.

Figure 2–8 shows advanced academic indicators for CCISD students compared to students in Region 6 and statewide. CCISD students perform at less than state and regional averages for most of these indicators. CCISD performs at greater rates than the state and the region for percentage of students participating in college-level entrance exams; however, 8.0 percent of those students scored at or greater than the criterion score.

The NAGC has developed a guide to G/T programming standards for prekindergarten to grade 12 in six areas: learning and development, assessment, curriculum and instruction, learning environments, programming, and professional development. In the area of curriculum and instruction, the guide states that teachers should "apply the

FIGURE 2–8
CORRIGAN-CAMDEN ISD ADVANCED ACADEMIC INDICATORS COMPARED TO STATE AND REGION
SCHOOL YEAR 2016–17

MEASURE	STATE	REGION 6	CORRIGAN-CAMDEN ISD
STAAR Percentage at Masters Grade Level, All Subjects	20.0%	22.0%	9.0%
Recommended High School Program/Distinguished Achievement Program Graduates (Annual Rate)	85.6%	83.1%	11.1%
Advanced Course/Dual-credit Course Completion	35.9%	30.6%	28.2%
AP/IB – (Participation) (1)	25.5%	23.1%	0.0%
SAT/ACT – Students Tested	71.6%	60.4%	73.5%
SAT/ACT –Percentage of examinees who scored at or greater than the criterion score	22.5%	31.4%	8.0%

NOTES:
(1) Participation rates show the percentage of students in grades 11 and 12 who completed the College Board's Advanced Placement (AP) examinations or the International Baccalaureate's (IB) Diploma Program examinations.
(2) STAAR=State of Texas Assessments of Academic Readiness; SAT=Scholastic Aptitude Test; ACT=American College Testing; Region 6=Regional Education Service Center VI.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2016–17.

theory and research-based models of curriculum and instruction related to students with gifts and talents and respond to their needs by planning, selecting, adapting, and creating culturally relevant curriculum."

Killeen ISD operates a commendable G/T program. G/T students at the elementary level are served in "cluster classes" that enable accelerated instruction in areas of talent. The district also provides Gifted Resource Rooms for enrichment and independent study. The middle school level offers courses for G/T students in the core areas of English, math, science, and social studies. Teaching strategies and the pace and complexity of the course materials distinguishes these gifted and talented courses from regular course offerings. High school students are offered special humanities courses in English and social studies in addition to advanced placement (AP) coursework.

CCISD should develop a long-term plan for advanced academics and districtwide procedures for G/T services, schedules, and curriculum.

The district should evaluate advanced academics options and consider additional options such as AP courses. The district should use the NAGC's gifted programming standards guide as a starting point for seeking to improve its G/T programs. NAGC has developed a snapshot survey of G/T programming effectiveness factors that districts can use for self-assessment. The curriculum and programs director should begin with these standards and complete an internal analysis. The district should complete the following activities:

- review the standards and resources developed by the NAGC;

- develop a G/T 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;

- evaluate implementation;

- revise the model based on evaluation; and

- monitor and revise as needed.

The district could implement this recommendation with existing resources.

STAFFING (REC. 10)

CCISD's organization and reporting structure do not adequately support instructional decision making and management, and the district has not evaluated staffing levels and assignments to determine if services are sufficient to meet student needs.

Small school districts often have faculty and staff serving in multiple roles; however, CCISD does not prioritize and maximize staff to best meet students' instructional needs.

CCISD has no certified counselors at the secondary level; an assistant principal serves that capacity at the junior high campus, and a student services coordinator serves that capacity at the high school campus. The elementary campus has two certified counselors, but neither provides therapeutic services. The high school student services coordinator has a large number of responsibilities, such as developing the course catalogue; advising students on graduation pathways; assisting with financial aid and scholarships; administering student programs for the high school campus, including the dyslexia program and other services in accordance with the U.S. Rehabilitation Act, Section 504, the at-risk program, and the ESL program; attending special education meetings; and serving as testing coordinator. These duties include many administrative tasks that limit time spent with students. The elementary counselors also spend approximately half of their time working on administrative tasks. The district has no crisis plans in place for potential incidents, such as suicide or sexual violence.

CCISD staffs its libraries with library aides, and it does not employ a certified librarian. When substitute teachers are not available, campus principals assign library aides to cover classes, and they are then unavailable for library services.

The district uses paraprofessionals to provide ESL support, as substitutes, and as inclusion and RTI teachers. Students with the highest educational needs receive many services from paraprofessionals instead of certified teachers or specialists. The district has been unable to fill a world language position, and, therefore, a paraprofessional manages students who work on a virtual Spanish course.

CCISD administrative staff also serve a variety of additional roles. For example, a campus assistant principal also serves as a coach and a bus driver. An assistant principal also serves in a counselor capacity. These additional responsibilities may

limit the administrators' time and resources for their primary roles in campus leadership. Assistant principals are not instructional leaders at all campuses, and are not consistently involved in curriculum and instructional decision making.

In the reporting structure for curriculum and instruction, the elementary instructional coordinator reports to the elementary principal, not to the curriculum and programs director. This structure may contribute to site-based curriculum and instruction decisions that are not aligned with an overall district plan. The curriculum and programs director also does not meet with grade levels and subject-area teams at every campus.

CCISD's students perform at less than the state averages on measures of student achievement. The district risks further decreases in performance if it does not approach its staffing needs more strategically.

According to a recent Texas Association of School Boards (TASB) article, "… districts must examine the unique needs of their student population and determine how staffing supports the district's mission and vision as well as the district's strategic plan. When hiring new staff and considering proper utilization of current staff, districts should develop a process and framework for determining staffing implications and action plans to ensure qualified people are in the proper place at the right time to properly serve students."

CCISD should assess the quality of services provided by the district, and develop a plan to align instructional services with industry staffing standards to best support student need.

To accomplish this alignment, CCISD should reevaluate staffing assignments as part of a district plan and maximize staffing to better meet student needs. CCISD should assess the type of staff required, the reporting structure, campus staffing allocations, and staff job responsibilities. Suggested adjustments include, but are not limited to the following:

- reallocating staff to provide degreed counselors at the elementary and secondary levels; and

- ensuring that staff who work with certain populations (e.g., students who receive ESL, G/T, special education, or dyslexia services) are certified, trained teachers and specialists.

Since the time of the review, district staff indicated that CCISD hired a certified Spanish teacher for the open world language position.

The district could implement this recommendation with existing resources.

BEGINNING TEACHER SUPPORT (REC. 11)

CCISD has not maximized mentoring and support for beginning teachers in the district.

District and campus staff reported that beginning teacher mentoring is informal and is managed at the campus level. Lead teachers at the elementary campus and department heads at the secondary campuses serve as mentors and receive stipends for the role.

However, CCISD has no written mentoring guidelines or handbook to guide and structure mentoring relationships. Mentors do not receive additional training from the district. District staff do not monitor or require documentation of the frequency or quality of support that mentors provide beginning teachers. Additionally, CCISD has not developed clear goals and effective strategies for selecting mentors, matching mentors with beginning teachers, and setting expectations for mentoring relationships.

Highly variable, informal mentoring practices may contribute to the district's difficulty in retaining teachers. Failure to address these staffing issues also risks further decreases in students' academic performance. The turnover rate for CCISD teachers during school year 2016–17 was 30.6 percent, greater than the state average of 16.4 percent.

Best practices for a mentoring program begin with the selection of a highly qualified mentor who demonstrates specific characteristics that will facilitate the mentoring process and build rapport with mentees. In addition to possessing considerable knowledge regarding curriculum and instruction, a mentor must be equipped with strong interpersonal skills and general professional qualities. Research suggests that mentors should exemplify the following qualities:

- commitment to the role of mentoring;

- acceptance of the beginning teacher;

- skill at providing instructional support;

- effectiveness in different interpersonal contexts;

- modeling how to be a continuous learner; and

- communication of hope and optimism.

Beyond selecting qualified mentors, a well-structured mentoring program aligns instructional support efforts. A

successful mentoring program is one in which the mentor works with the new teacher to implement strategies and best practices and helps the new teacher to process and prioritize diverse expectations from the many advisers and leaders in the school environment. Such advisers may include content-area department chairs, teacher preparation supervisors, instructional coaches, and campus and central office administrators. A quality mentoring program establishes norms of collegiality, collaboration, and continuous professional development in campuses. A strong mentoring program provides systematic and ongoing support for new teachers.

CCISD should develop a teacher-mentoring program that includes specific guidelines and timelines for providing support to beginning teachers.

The district should develop a mentoring manual that clearly defines the roles and responsibilities for all stakeholders in the mentoring process. These stakeholders include district coordinators, principals, mentors, new teachers, and university or community partners. The district should identify resources and make them accessible for mentors and new teachers. The district also should evaluate some of the mentoring practices used at its campuses to ascertain their effectiveness and to seek out models of excellence. CCISD should establish a committee of stakeholders including beginning and experienced teachers, principals, and district staff to develop the mentoring manual. This manual will serve as a guide for mentoring in the district and to provide general oversight for the district's mentoring program. The mentoring manual also should explain accountability measures for mentors and beginning teachers, such as the expected number of collaboration hours and types of mentor-beginning teacher interactions.

The district could implement this recommendation with existing resources.

PROGRAM EVALUATION (REC. 12)

CCISD ISD lacks an effective process to evaluate and improve student programs.

CCISD lacks a process to evaluate district programs to ensure their effective and efficient operation and performance. The district has not evaluated district programs, such as ESL, G/T, career and technical education, and dyslexia. During onsite interviews, CCISD staff confirmed that the district did not have a process to determine if programs were meeting students' needs. Staff indicated that this lack of process was

because of a lack of program evaluation. The curriculum and programs director's job description includes evaluation of federal and special programs, but the director had not conducted or scheduled program evaluations at the time of the review.

The district evaluates its supplemental instructional software programs annually based on student performance, student usage reports, and cost-effectiveness.

CCISD participates in a special education cooperative, the Polk County Special Services Cooperative, with three local districts. The PCSSC director of special education supervises contracted professional staff and manages the district's special education program. PCSSC staff provide occupational therapy, physical therapy, vision services, orientation and mobility services, and student evaluations. However, CCISD does not evaluate the effectiveness of the special education program provided by PCSSC, nor do district staff require campus administrators to provide ongoing, standardized evaluation of campus special education services.

The district reviews assessment results of every grading period and student performance on state assessments to determine program effectiveness. However, these reviews do not provide CCISD a comprehensive view of its programs or sufficient data and tools to determine program improvement strategies and needed resources. These assessments do not enable the district to identify program weaknesses and pinpoint needed changes, guiding continuous program improvements. Reliance on these assessments limits the district's ability to pinpoint and address the reason for poor performance and to develop strategies to increase program effectiveness.

The lack of evaluations of instructional programs increases the risk that CCISD spends its resources on programs that do not improve student performance. Effective districts periodically assess and adapt all programmatic activities to ensure that the district is investing in programs that support continuous student improvement. Without such assessments, CCISD cannot ensure it is effective in achieving its intended purpose.

Program evaluation is a valuable tool for staff who are seeking to strengthen the quality of their programs and improve outcomes for students. According to *Why Conduct a Program Evaluation?*, by Dr. Allison Metz, October 2007, program evaluation "answers basic questions about a program's effectiveness, and evaluation data can be used to improve program services." Program evaluation is a systematic method for collecting, analyzing, and using information to answer basic questions about a program.

School districts typically divide evaluation models into either process or outcome categories. Process evaluations assess whether an intervention or program model was implemented as planned, whether the intended target population was reached, and the major challenges and successful strategies associated with program implementation (i.e., whether the steps and the program timeline were followed). Outcome evaluations determine whether, and to what extent, the expected changes in student outcomes (i.e., student performance) occur and whether these changes can be attributed to the program or program activities.

Rockwood school district developed a program evaluation plan that contains best practice steps for organizing and developing a program evaluation. **Figure 2–9** shows Rockwood school district's procedures for implementing a program evaluation plan.

CCISD should develop and implement a formal procedure for the evaluation of the district's programs and initiatives.

FIGURE 2–9
PROCEDURES FOR IMPLEMENTING A PROGRAM EVALUATION PLAN
2010

STEPS	CONSIDERATIONS

1. Develop a steering committee; include individuals with the needed expertise but limit the size to ensure manageable decision making.	Responsibilities include:
	
	 • discuss key questions to be answered by the evaluation:
	    o What is the purpose of the evaluation?
	    o What do we desire to know about the program? and
	    o How has staff development affected results?
	 • organize the effort and assign tasks;
	 • conduct an information-gathering activity; and
	 • analyze the information so that it can be summarized and recommendations can be developed.

2. After the committee selects the purpose of the evaluation, focus and narrow the scope. The focus should include how the program increases student achievement.	Possible areas of focus: • staff, student, and parent perceptions of success; • comparison of actual results to expected results; • comparison of results to other districts or results; and • evaluation of the effectiveness of professional development.
3. Select the information sources that will be needed for the program evaluation.	Quantitative suggestions: • scores; • budgets; • attendance; and • all applicable forms of data. Qualitative suggestions: • interviews; • focus groups; • observations; and • survey results.
4. Establish a management plan or detailed schedule for the evaluation. The steering committee should include these 10 steps and set a target completion date for each step and any resources needed for each step.	Suggested questions: • What data will be collected and how? • How large a sample is needed? • What will it cost in time and resources? • Who needs to review the rough draft? • What will the final report look like? and • When is the report due?

FIGURE 2–9 (CONTINUED)
PROCEDURES FOR IMPLEMENTING A PROGRAM EVALUATION PLAN
2010

STEPS	CONSIDERATIONS
5. Develop or select the instruments or forms for collecting quantitative and qualitative information.	Suggested questions: • What data collection, scoring, and analysis instruments already exist? • What data already have been collected? and • Who needs to provide information, and how long will it require?
6. Collect the information.	Be thoughtful about scheduling data collection activities to meet timelines.
7. Analyze the information, summarize the results and make recommendations.	Suggestions: • report verbatim for qualitative reporting; • report results by topic or by question; • chart results; and • use measures of central tendency (mean, median, or mode) for quantitative reporting.
8. Prepare the initial report.	Suggestions: • condense, but be as inclusive as possible; and • key stakeholders should review the report and collaborate before the report is shared.
9. Share the final evaluation with stakeholders in the evaluation.	Share with appropriate stakeholders: • team members; • department members; • administrative staff; • curriculum committee; and • Board of Education (as is appropriate).
10. Develop a follow-up plan.	Critical steps: • develop follow-up objectives and a timeline; • determine who will be responsible; • target completion dates; • identify evidence of each activity; and • determine what further staff development is needed.

SOURCE: Rockwood School District, Program Evaluation Plan, 2010.

CCISD should study and develop a consistent and effective evaluation process for all instructional programs. The curriculum and programs director should coordinate the following steps and include them in the planning process:

• identify district and campus staff roles;

• determine the purpose of the evaluation process;

• select data sources to inform the evaluation;

• develop a timeline for the implementation determining what instructional programs will be reviewed in what years;

• select or develop the instruments to be used for data collection;

• collect the data;

• analyze the data;

• prepare the initial report;

• share the evaluation with appropriate stakeholders; and

• develop an action plan for modifying the instructional program(s) reviewed.

The district should review the goals and objectives of each program and service at least biennially; generate reports of the effectiveness of each program and service; and take action to ensure that these programs efficiently achieve their goals. The district should incorporate the process into the annual DIP to ensure consistency of review.

Since the time of the review, district staff indicated that all programs would be evaluated during the summer of 2018, and the results communicated through summer administrative meetings.

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 should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION		2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 2. EDUCATIONAL SERVICE DELIVERY								
6.	Develop and implement a comprehensive curriculum management plan.	$0	$0	$0	$0	$0	$0	$0
7.	Implement a Response to Intervention process districtwide with fidelity to the model and regularly evaluate student intervention programs for effectiveness.	$0	$0	$0	$0	$0	$0	$0
8.	Develop and implement a process for continuous evaluation of the district's English as a Second Language program to ensure that instructional delivery effectively meets the needs of English Language Learner students.	$0	$0	$0	$0	$0	$0	$0
9.	Develop a long-term plan for advanced academics and districtwide procedures for gifted and talented services, schedules, and curriculum.	$0	$0	$0	$0	$0	$0	$0
10.	Assess the quality of services provided by the district, and develop a plan to align instructional services with industry staffing standards to best support student need.	$0	$0	$0	$0	$0	$0	$0
11.	Develop a teacher-mentoring program that includes specific guidelines and timelines for providing support to beginning teachers.	$0	$0	$0	$0	$0	$0	$0
12.	Develop and implement a formal procedure for the evaluation of the district's programs and initiatives.	$0	$0	$0	$0	$0	$0	$0
TOTAL		**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 3. HUMAN RESOURCES MANAGEMENT

An independent school district's human resources function is responsible for the management of staff. Human resource management is dependent on the organizational structure of the district. Larger districts may have staff dedicated to human resource management, while smaller districts assign staff these responsibilities as a secondary assignment.

Human resource management includes compensation and benefits, recruitment, hiring and retention, administrative planning and duties, 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 3–1 shows the district's human resources (HR) organization. The district distributes the HR functions among the superintendent, business manager, and HR director.

FIGURE 3–1
CORRIGAN-CAMDEN ISD ORGANIZATION FOR HUMAN RESOURCES
SCHOOL YEAR 2017–18

Superintendent

Business Manager

Human Resources Director/Development Coordinator

SOURCES: Legislative Budget Board School Performance Review Team; Corrigan-Camden ISD, September 2017.

Corrigan-Camden Independent School District's (CCISD) HR function is responsible for the following staff activities:

- posting and updating position vacancies;

- conducting background checks of applicants;

- processing new staff;

- monitoring the licensure status for all certified staff;

- maintaining staff files; and

- assisting in the administration of staff compensation and benefits.

During school year 2016–17, CCISD employed 165.8 full-time-equivalent (FTE) positions at the district's three campuses and administrative building to provide services to 917 students. The three campuses include Corrigan-Camden Elementary School, Corrigan-Camden Junior High School, and Corrigan-Camden High School.

Figure 3–2 shows CCISD's payroll expenditure as a percentage of all funds compared to its peer districts during school year 2016–17. Peer districts are districts similar to CCISD that the Legislative Budget Board's School Performance Review Team uses for comparison purposes. Payroll expenditures were similar for all four peer districts' expenditures, which ranged from $6.4 million to $7.4 million. CCISD's payroll accounted for 75.1 percent of its total expenditures, which is the greatest among peer districts but less than the state average of 80.7 percent.

Figure 3–3 shows the percentage of staff in five main categories for CCISD compared to those of its peer districts. During school year 2016–17, CCISD employed the smallest percentage of teachers compared to its peer districts, but it also employed the greatest percentage of educational aides compared to its peer districts.

Figure 3–4 shows the student-to-teacher ratios and student-to-staff ratios for CCISD and its peer districts. The CCISD staffing ratio for students to staff is less than its peer districts, Regional Education Service Center VI (Region 6), and the state.

FIGURE 3–2
CORRIGAN-CAMDEN ISD ACTUAL PAYROLL EXPENDITURES AS A PERCENTAGE OF ALL FUNDS COMPARED TO PEER
DISTRICTS
SCHOOL YEAR 2016–17

CATEGORY	CORRIGAN-CAMDEN ISD	CITY VIEW ISD	KEENE ISD	ROOSEVELT ISD
Total expenditures (in millions)	$8.5	$10.1	$12.1	$9.9
Payroll expenditures (in millions)	$6.4	$7.4	$6.6	$7.1
Payroll as a percentage of total expenditures	75.1%	73.5%	54.8%	71.8%
Total Staff FTE (1) positions	165.8	156.8	154.3	176.2
Total Teacher FTE positions	75.4	82.1	84.1	92.9
Student Enrollment	917	1,003	1,057	1,064

NOTE: (1) FTE=full-time-equivalent positions.
SOURCES: Texas Education Agency, Public Education Information Management System, Actual Financial Data, school year 2016–17, and Texas
Academic Performance Reports, school year 2016–17.

FIGURE 3–3
CORRIGAN-CAMDEN ISD PERCENTAGE OF STAFF TYPES COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2016–17

STAFF	CORRIGAN-CAMDEN ISD	CITY VIEW ISD	KEENE ISD	ROOSEVELT ISD
Teachers	42.5%	49.8%	54.5%	52.7%
Support staff	7.6%	8.5%	8.6%	5.5%
Administrative staff	7.7%	5.5%	6.8%	5.1%
Educational aide	19.0%	17.6%	15.2%	11.5%
Auxiliary staff	23.1%	18.7%	14.9%	25.2%

NOTE: Percentages may not sum to 100.0 percent due to rounding.
SOURCES: Legislative Budget Board School Performance Review Team, February 2018; Texas Education Agency, 2016–17 Staff Salaries and
Full-time-equivalent Position Counts.

FIGURE 3–4
STUDENT–TEACHER AND STUDENT–STAFF RATIOS
COMPARISON
SCHOOL YEAR 2016–17

AREA	STUDENT–TEACHER RATIO	STUDENT–STAFF RATIO
Corrigan-Camden ISD	12.2	5.5
City View ISD	12.2	6.4
Keene ISD	12.6	6.9
Roosevelt ISD	11.5	6.0
Region 6 (1)	15.0	7.6
State	15.1	7.6

NOTE: (1) Regional Education Service Center VI.
SOURCE: Texas Education Agency, Texas Academic Performance
Reports, school year 2016–17.

FINDINGS

♦ Corrigan-Camden ISD's human resources functions are fragmented, leading to inconsistency in human resources practices.

♦ Corrigan-Camden ISD's hiring process is inconsistent and does not follow board policies and federal guidelines.

♦ Corrigan-Camden ISD's supplemental pay for nonexempt staff violates board policy and may not follow the U.S. Fair Labor Standards Act provisions.

♦ Corrigan-Camden ISD lacks consistent procedures related to nonexempt staff use of the time clock.

RECOMMENDATIONS

♦ **Recommendation 13: Transfer all human resources duties to the HR director and reassign the payroll duties.**

♦ **Recommendation 14: Develop and implement formal written procedures and forms for hiring new staff.**

♦ **Recommendation 15: Discontinue the use of supplemental pay for nonexempt staff and alter**

the overtime calculation for staff who also drive buses.

♦ **Recommendation 16: Require all nonexempt staff to participate in the district's electronic timekeeping system.**

DETAILED FINDINGS

HUMAN RESOURCES FUNCTION (REC. 13)

CCISD's human resources functions are fragmented, leading to inconsistency in human resources practices.

In July 2016, CCISD filled the HR director position. Before filling this position, the director was a teacher for 26 years. The HR director participated in the following human resources training sessions during school year 2016–17:

- Texas School HR Administrators Academy – Texas Association School Boards (TASB);

- Fair Labor Standards Issues – Texas Association of School Business Officers (TASBO);

- TimeClock Plus Q & A – Education Service Center, Region 6;

- Affordable Care Act Update – TASBO;

- State Allotments: What I Need to Know –Region 6; and

- Creditable Years of Service and Personnel Record Issues – TASBO.

In early 2017, the superintendent developed the position's job description, which defines the primary purpose of the position as directing and managing the human resources function. The main human resources responsibilities and duties include:

- forecasting staffing needs and developing staffing plans;

- developing and implementing recruitment and retention strategies to include a screening and selection process for all staff;

- providing a system for new staff to acquire appropriate training;

- directing the administration of the district's compensation program, including job descriptions;

- managing salary surveys and position reclassifications;

- developing, implementing, administering, and monitoring procedures for salary administration and placement of new hires;

- overseeing management of the district's leave, health insurance, voluntary staff benefits, and workers' compensation;

- overseeing the district's staff relations;

- updating the staff handbook annually; and

- managing personnel records.

Additionally, the district has assigned payroll responsibilities to this position, such as:

- maintaining payroll registers and staff payroll information;

- calculating staff wages, salaries, hours worked, and overtime pay, and determining withholdings, deductions, and net pay;

- preparing paychecks and balancing payroll earnings and deductions;

- receiving and auditing time sheets for all district staff; and

- submitting payroll reports and forms to various federal and state agencies.

According to interviews with the HR director, she does not complete all of the human resources responsibilities outlined in her job description because the superintendent and business manager conduct many of those duties.

CCISD staff indicated that the superintendent fulfills most of the human resources duties with the assistance of the business manager. For example, the superintendent interviews some professional applicants, sets the compensation plan for the district (which is approved by the board), analyzes job market wages, adjusts pay schedules, manages the compensation schedule to include reclassifying positions, and participates in recruiting new staff. The superintendent has access to the district's information management system and could enter or change new-hire information and salaries.

The business manager receives all new-hire documentation from the superintendent after the Board of Trustees has approved the hiring. The business manager enters the information in TxEIS, the district's information management system, and initiates and maintains the personnel files. The

business manager also manages the workers' compensation program and the staff benefits program. These duties are not part of the business manager's job description.

The HR director's responsibilities have focused on handling payroll duties, managing leaves and absences, and ensuring that staff complete all required district training. The HR director also develops and maintains job descriptions and stipend sheets and conducts new-hire orientation. She is involved with some other duties, such as personnel files, personal leave in accordance with the U.S. Family and Medical Leave Act, and staff benefits. However, she is not primarily responsible for any of those tasks. Because of her role related to payroll, the HR director reports to the business manager.

During the review team's onsite interviews, staff indicated that the district's administration inconsistently executes the human resources function. Although the district evaluates its teaching staff effectively, administrators haphazardly evaluate nonteaching staff. For example, during onsite interviews, CCISD staff indicated that the evaluation process for administrators is inconsistent. The superintendent described the process as a staff self-evaluation followed by a conference with the assigned supervisor. However, some staff interviewed stated that their supervisors did not conduct the evaluations during the last school year, and other staff completed self-evaluations but did not have a conference with the superintendent.

Staff also indicated confusion as to where the district files evaluations. A review of personnel files indicated that evaluations for nonteaching staff are not in their personnel file or in an electronic file. Interviews with some district supervisors reported that they sent completed evaluations to the central office, but central office staff reported that principals keep the evaluations at the campuses.

Using the HR director primarily as a payroll clerk denies the district strategic and consistent human resources management. Because of the payroll responsibilities, the director is not able to oversee all of the human resources functions, which results in inconsistencies throughout the district.

CCISD should transfer all human resources duties to the HR director and reassign the payroll duties.

The district should remove the payroll duties from the HR director's job description. The district should reassign the

payroll duties to the business manager. The HR director should report to the superintendent.

The HR director should attend further training regarding public school staffing strategies, legal issues, and wage and salary administration. The director also should develop an ongoing training program to inform all supervisors of the district's expectations. The district is a paid member of TASB's HR services, which provide HR webinars, trainings, and other resources free of charge to members.

The district could implement this recommendation with existing resources.

HIRING PROCESS (REC. 14)

CCISD's hiring process is inconsistent and does not follow board policies and federal guidelines.

CCISD's Board Policy DC (LEGAL) and Board Policy DC (LOCAL), regarding employment practices, require the district to establish written guidelines for advertising employment opportunities and posting notices of vacancies. However, the review team did not find evidence of written guidelines for advertising and posting jobs. Campus principals and other supervisors described the informal process for hiring teachers as including the following steps:

- a supervisor informs the superintendent of a pending vacancy;

- the supervisor forwards resignation documentation to Human Resources;

- human resources staff prepare exit documents;

- the superintendent reviews information to determine whether the position will be posted or absorbed;

- the district posts the position on the district website using the TalentEd educational management application;

- the supervisor interviews applicants;

- the supervisor checks applicants' references;

- the supervisor verbally recommends the best applicant to the superintendent, who may also interview the applicant; and

- the superintendent recommends the applicant to board for hire.

CCISD posts all open teaching positions. However, CCISD does not always post positions that do not require certification

and/or licensure. During onsite interviews, various supervisors and staff indicated that an informal process exists in which district supervisors sometimes choose staff or an applicant to fill a position before the district posts the opening or schedules an interview. Some staff reported that a district supervisor asked them if they were interested in a specific vacant position, and then the district hired them for the position.

Additionally, a CCISD supervisor stated that if an applicant has listed a professional acquaintance in the community whom the supervisor knows, the supervisor calls that acquaintance for information regarding the applicant before holding a formal screening or interviewing. This staff called the procedure a pre-interview process that enables the district staff to select a strong candidate. This staff admitted to not having been trained regarding hiring protocols.

During onsite interviews, principals indicated that the district lacks written procedures and supervisor training for hiring potential candidates. Principals stated that the district has no procedures or training regarding using equitable selection methods, following appropriate interview steps, or effectively checking references. For example, district supervisors use different methods to select appropriate questions to ask applicants. Sometimes, the district supervisors form interview committees, and other times they do not. Some staff use existing knowledge about interviewing and the hiring process as a guide when conducting interviews in the district.

CCISD supervisors also do not keep interview documents or reference check documentation. Reference check documentation provides evidence that the district properly vetted the applicant before hire. In addition, supervisors informally call the superintendent to recommend an applicant for hire rather than using a formal written procedure that captures pertinent information, such as who they interviewed, reference check verification, and interview scoring information.

Inconsistent posting practices, varying and arbitrary methods to select applicants for interviews, pre-interview reference checks, or informally selecting an existing staff to fill a position are all questionable practices and not in compliance with U.S. Equal Employment Opportunity Commission (EEOC) guidelines. The EEOC is a federal agency that administers and enforces civil rights laws against workplace discrimination. The EEOC outlines hiring best practices that assist employers in avoiding discriminatory employment

decisions based on gender, race, national origin, disability and religion, for example. These practices include the following:

- considering a wide and diversified pool of candidates for each position;

- training all staff regarding EEOC laws; and

- establishing neutral and objective criteria to avoid subjective employment decisions.

CCISD should develop and implement formal written procedures and forms for hiring new staff.

The HR director should develop these procedures and forms. The procedures should address the following areas:

- recruiting new staff;

- requesting additional staff positions;

- filling position vacancies;

- posting procedures and timelines;

- using screening tools to objectively select applicants to interview;

- using interview committees;

- employing contractual personnel;

- employing noncontractual personnel;

- checking references; and

- using formal recommendation forms, such as Personnel Action Forms, that formally document the recommended candidate selection;

After the procedures are complete, the HR director should develop forms that the district can use to facilitate the hiring process. These forms should include the following:

- applicant screening forms;

- interview committee rating sheets;

- recommendation forms, and

- reference check forms identifying references called, their contact information, and the questions asked.

These forms may be filed as new-hire documentation if the district receives an EEOC inquiry.

The district should train all supervisors regarding the procedures and forms after they have been developed and approved by the superintendent and the board.

The district could implement this recommendation with existing resources.

SUPPLEMENTAL PAY (REC. 15)

CCISD's supplemental pay for nonexempt staff violates board policy and may not follow the U.S. Fair Labor Standards Act (FLSA) provisions.

CCISD's Board Policy DEAA (LOCAL), regarding compensation plan incentives and stipends, stipulates that the superintendent or designee may assign supplemental duties only to personnel that are exempt, pursuant to the FLSA, as needed. Positions that are classified as exempt are exempt from accruing overtime pay for hours worked more than 40.0 hours per week. The FLSA recognizes three main categories of exempt staff, which include executive, professional, and administrative. Nonexempt staff are staff who, because of the type of duties performed, the usual level of decision-making authority, and the method of compensation must be paid the minimum wage and overtime pay for any time worked more than 40.0 hours per week.

However, during onsite interviews, CCISD staff indicated that the district pays 28 nonexempt staff supplemental stipends to perform additional duties. These staff include mostly instructional aides and some clerical staff. Nonexempt staff typically perform these supplemental duties during their regular workdays.

Based on district interviews and a review of personnel files, the district has developed a Supplemental Job Description/ Pay Notice form to document the extra duties that nonexempt staff perform in addition to their regular duties. CCISD staff sign the Job Description/Pay Notice form at the beginning of each school year. The supervisor, who is typically a principal, and the superintendent approve the form. The district requires that nonexempt staff keep logs of the supplemental duties they perform. The nonexempt staff submit the log of the supplemental duties at the end of the school year to receive the supplemental stipend. The nonexempt staff's supervisor and the HR director approve the form and submit it to the Business Office for payment. The nonexempt staff does not keep exact records of the time spent in the completion of the supplemental duties each pay period. The FLSA, Title 29, Part 516, requires employers to keep accurate time records of nonexempt staff's total daily and weekly work hours.

The Supplemental Job Description/Pay Notice Form contains language that informs nonexempt staff that the

district may prorate the supplemental stipend if the staff does not perform the duties or if the district terminates the assignment. At the end of the school year, if staff do not fulfill his or her duties, the district may deduct the full or prorated balance of the unearned supplemental pay from the staff's paycheck before the final paycheck of the year. It is not clear how the district would be able to determine how to prorate pay of uncompleted supplemental duties if the nonexempt staff did not record the exact time spent completing these duties. CCISD's practice of requiring nonexempt staff to keep logs of supplemental duties instead of accurate time records violates the district's compensation plan that requires staff to keep accurate time records. The district's compensation plan provides overall guidelines regarding how the district pays different positions in the district as well as the type and amount paid for stipends.

During the review team's onsite interviews with Business Office staff, the HR director and the business manager said that they check electronic time records each period for overtime accruals. The district uses an electronic program called TimeClock Plus to record staff hours. A review of some of the district's TimeClock Plus records verifies that the district scrutinizes the time records. However, the review team discovered that when a nonexempt instructional aide, who is receiving supplemental pay, accrues overtime, Business Office staff highlight the overtime earned and note the specific supplemental stipend the nonexempt staff is receiving. The district may be reconciling the overtime owed with the supplemental pay earned during each pay period instead of paying the staff overtime for each pay period. FLSA provisions require employers to pay for any overtime hours that nonexempt staff accrue per pay period.

In addition, some Supplemental Job Description/Pay Forms require nonexempt staff to work during the summer acting as a translator. The form does not include any provision that explains how the district will compensate summer employment if the work occurs after the end of the staff's work calendar.

During onsite interviews, some instructional aides, custodians, and maintenance staff indicated that they earn paid overtime for driving school buses, as a secondary position. The district calculates the overtime pay rate for these staff who work dual assignments at one-and-one-half times their regular hourly rate and not on the bus driver rate. For example, one district staff's regular hourly rate is $15.62 per hour, and the district calculates the staff's overtime rate at one-and–one-half times the hourly rate as $23.43 for each

hour worked more than 40.0 hours. This calculation means that the district is overpaying this staff, who, if the staff earned the minimum bus driver rate of $12.34 an hour, would earn $18.51 hourly for overtime bus driver pay.

However, for some CCISD staff, their regular hourly rate is less than the bus driver's minimum rate of pay. For example, the hourly pay for one staff is $10.07, which is less than the $12.34 per hour that a bus driver earns. Calculating overtime at a rate less than $12.34 an hour equates to underpaying this staff.

Additionally, during onsite interviews, supervisors were confused about which nonexempt staff should use TimeClock Plus to capture their bus-driving duties. One supervisor indicated that all instructional aides who also earn paid overtime for driving school buses must use the time clock for their bus-driving duties. However, when he checked TimeClock Plus records to verify his assumption, he discovered that one nonexempt staff member regularly clocked in, but another nonexempt staff did not. The district's timekeeping procedures published on its website require nonexempt staff to use the electronic timekeeping system to record work hours.

When CCISD's district officials assign supplemental pay to nonexempt staff, the district does not comply with board policy. If the district does not maintain specific time records for supplemental duties that nonexempt staff perform, the district may not comply with FLSA provisions. The U.S. Department of Labor (DOL), which enforces the FLSA, does not recommend paying nonexempt staff using stipends or supplemental pay for performing additional duties. If staff allege that the district has failed to pay for time worked, the DOL may respond with an investigation exposing the district to penalties.

CCISD should discontinue the use of supplemental pay for nonexempt staff and alter the overtime calculation for staff who also drive buses.

To implement this recommendation, the district should review the district's compensation plan and consider redefining pay levels for instructional aides. Instead of using level requirements based on college hours completed, the district should reclassify the positions or establish new pay levels to include the additional duties, skills, and responsibilities for each pay grade. For example, many districts classify bilingual, at-risk, and special education aide positions at a higher level than other instructional aides because of the specialized skills the jobs require. CCISD should consider using this strategy for other nonexempt staff who regularly perform additional duties and

receive supplemental pay. In addition, the district should revise job descriptions to include the additional specialized duties the nonexempt staff will perform in a new pay grade level.

If staff must work additional time to complete their assignments, they should remain on the clock so that they can document their overtime work. The district should compensate the staff with either compensatory time off or paid overtime, in accordance with the district compensation plan.

All nonexempt staff who also drive school buses should clock in and out for the time they drive. This recording will provide an accurate accounting of the work performed and the overtime accrued for all staff, as required by the FLSA. The district should compensate staff using a weighted hourly rate for each staff, pursuant to FLSA provisions, to ensure that the district equitably pays all staff for the overtime work they perform.

Nine staff drove a school bus, worked another position in the district, and received overtime pay. When compared with using a blended rate, three staff were overcompensated, and six staff were undercompensated. A blended rate uses the weighted averages of salaries for staff who work at two or more rates to calculate the rate that is used for overtime compensation. **Figure 3–5** shows the differences in pay for all nine staff.

FIGURE 3–5
CORRIGAN-CAMDEN ISD OVERTIME FOR STAFF WHO ALSO DRIVE A SCHOOL BUS
SCHOOL YEAR 2017–18

POSITION	OVERTIME OVERPAYMENT COMPARED TO A BLENDED RATE	OVERTIME UNDERPAYMENT COMPARED TO A BLENDED RATE
1. Aide	$1,958	
2. Aide	$4,400	
3. Aide	$551	
4. Custodian		$26
5. Aide		$625
6. Aide		$1.544
7. Custodian		$1,355
8. Aide		$1,654
9. Aide		$16
Total	**$6,909**	**$5,220**
Total potential savings	**$1,689**	

Sources: Legislative Budget Board School Performance Review Team; Corrigan-Camden ISD, September 2017.

The district could implement this recommendation with existing resources. Using a blended overtime rate could result in savings to the district, but the exact amount would depend on actual overtime. Based on the calculation shown in **Figure 3–5**, if the district instead uses a blended overtime rate for these nine staff, the district would save $1,689 per year.

TIME CLOCK PROCEDURES (REC. 16)
CCISD lacks consistent procedures related to nonexempt staff use of the time clock.

The FLSA, Title 29, Part 516, requires employers to keep accurate time records of nonexempt staff total work hours daily and weekly. In addition, the district's timekeeping procedures published on its website require nonexempt staff to use the electronic timekeeping system, TimeClock Plus, to record work hours. However, during onsite interviews, staff indicated that the district is not adhering to its timekeeping procedure. For example, CCISD authorizes nonexempt staff to record time on handwritten time sheets instead of using the district's electronic timekeeping system. Campus secretaries and some instructional aides are not required to use the district's time clock to record their time worked. At the high school, the library aide, receptionist, and interpreter do not use the district's time clock to record their work time. Instead, these staff record their time on handwritten time sheets.

According to FLSA provisions, if an employer chooses to use handwritten time sheets, the record must include starting and ending work times. If the district does not pay for a lunch break, the staff must record the beginning of lunch and the end time of the lunch period. Each staff must record daily time worked, and each staff must have her or his own time sheet displaying the staff's name and assignment and the staff's and supervisor's signatures.

During onsite interviews, campus staff indicated that principals and campus secretaries are required to call substitutes when teachers are absent. The campus secretaries do this work from home and do not record their time worked. Principals were not sure how CCISD compensates their campus secretaries for their work time at home and their possible overtime hours.

Additionally, the superintendent's secretary is nonexempt. According to the superintendent and documents that the district provided, the district provides compensatory time off for the secretary when she works at board meetings and other

meetings outside of her normal work schedule. However, the superintendent's secretary did not realize this was true and told the school review team that she does not receive compensatory time off. She reported that she receives a salary, and that the district considers her after-hours work at the board meetings to be part of her salaried duties. She reported that she never clocks in or out, and it is not clear how the superintendent calculates the hours for the comp time that she tracks for some employees. Almost all of the comp time hours were calculated at exact hour intervals, which implies that there is no exact tracking system for comp hours.

When employers are not consistent in recording precise work time or overtime accrual consistent with their written procedures, they are at risk of not adhering to FLSA provisions. Using handwritten time records for some staff when the district has an electronic timekeeping system for other staff is inefficient. Although handwritten time records are acceptable to the DOL, this practice does not meet industry standards or best practice. Furthermore, when district officials assign work duties after regular work hours without awarding compensatory time off or overtime pay, they are also in violation of the FLSA.

CCISD should require all nonexempt staff to participate in the district's electronic timekeeping system.

The district should consider the following implementation steps:
- require all nonexempt staff to use TimeClock Plus, which will record all time worked, including overtime and comp time, accurately; records must show the hours that the staff actually worked; and

- assign the substitute-calling responsibility to exempt staff, such as a campus administrator, who is not eligible for overtime pay.

The fiscal impact cannot be determined, because it is based on whether overtime pay significantly changes when all employees use TimeClock Plus and how much overtime the superintendent's secretary accrues.

FISCAL IMPACT

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

RECOMMENDATION	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 3. HUMAN RESOURCES MANAGEMENT							
13. Transfer all human resources duties to the human resources director and reassign the payroll duties.	$0	$0	$0	$0	$0	$0	$0
14. Develop and implement formal written procedures and forms for hiring new staff.	$0	$0	$0	$0	$0	$0	$0
15 Discontinue the use of supplemental pay for nonexempt staff and alter the overtime calculation for staff who also drive buses.	$1,689	$1,689	$1,689	$1,689	$1,689	$8,445	$0
16. Require all nonexempt staff to participate in the district's electronic timekeeping system.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$1,689**	**$1,689**	**$1,689**	**$1,689**	**$1,689**	**$8,445**	**$0**

CHAPTER 4. BUSINESS SERVICES

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 expenditure of funds; and involvement of campus and community stakeholders in the budget process. Managing accounting and payroll includes developing internal controls and safeguards; reporting account balances; and scheduling disbursements to maximize funds. Management of this area includes segregation of duties, use of school administration software systems, and providing staff training.

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

An independent school district's asset and risk management function controls costs by ensuring adequate protection against significant losses with the lowest possible insurance premiums. This protection includes the identification of risks and methods to minimize their 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 also 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 (FASRG), which is available as a resource for district purchasing.

Figure 4–1 shows the financial management organization for Corrigan-Camden Independent School District (CCISD). The business manager directs and manages 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 Board of Trustees. The business manager also performs several human resources (HR) duties, including documenting new hires, initiating and maintaining personnel files, and managing the workers' compensation program and staff benefits program. The business manager supervises a full-time accounts payable clerk and full-time HR director. The accounts payable clerk maintains accounting records and processes accounts payable. The HR director processes payroll and administers benefits. The Public Education Information Management System (PEIMS) coordinator, who also serves as the superintendent's

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FIGURE 4–1
CORRIGAN-CAMDEN ISD BUSINESS SERVICES ORGANIZATION
SCHOOL YEAR 2017–18
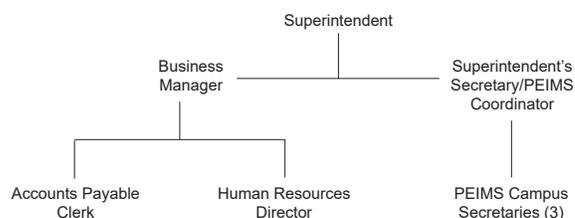
Sources: Legislative Budget Board School Performance Review Team; Corrigan-Camden ISD, September 2017.

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secretary, does not report to the business manager. The PEIMS coordinator supervises the work of the PEIMS clerks on each campus.

For fiscal year 2017, CCISD's adopted budget is $8.8 million. **Figure 4–2** shows CCISD's actual financial data for school years 2013–14 to 2015–16 and budgeted financial data for school year 2016–17. The top expenditure categories for each of these years are instruction and plant maintenance and operations. School leadership, capital outlay, and general administration also have been significant expenditure categories in these years.

Figure 4–3 shows CCISD's fund balance for school years 2014–15 to 2016–17. A fund balance is the amount of district assets in excess of liabilities. These assets could include investments, delinquent taxes, accounts receivable, and inventories.

TEA recommends a minimum unrestricted fund balance of approximately two and one-half months of operating expenditures. CCISD's fund balance met this standard for fiscal years 2014, 2015, and 2016. The fund balance has increased every year except for school year 2015–16, due to higher plant maintenance and operations and student transportation expenses.

FIGURE 4–2
CORRIGAN-CAMDEN ISD FINANCIAL DATA
SCHOOL YEARS 2013–14 TO 2016–17

CATEGORY	2013–14	2014–15	2015–16	2016–17
Revenue				
Local and Intermediate Sources	$3,102,604	$3,421,194	$3,777,317	$4,170,196
State program revenues	$6,229,085	$5,723,297	$5,425,634	$4,853,675
Federal program revenues	$79,870	$1,79,585	$115,388	$112,054
Total Revenue	**$9,411,556**	**$9,324,076**	**$9,318,339**	**$9,135,925**
Expenditures				
Instruction	$4,521,988	$4,478,381	$4,956,965	$4,453,719
Library and Media Services	$8,939	$9,095	$8,243	$9,335
Curriculum and Staff Development	$2,387	$28,574	$28,263	$25,073
Instructional Leadership	$0	$7,219	$12,401	$5,750
School Leadership	$598,557	$651,326	$630,516	$715,530
Guidance and Counseling Services	$175,188	$177,804	$154,738	$132,296
Social Work Services	$0	$0	$0	$0
Health Services	$106,6010	$105,334	$115,853	$116,107
Transportation	$694,576	$477,060	$665,917	$511,844
Food	$0	$0	$0	$0
Extracurricular	$410,107	$437,568	$426,423	$432,602
General Administration	$601,047	$411,273	$390,084	$474,507
Plant Maintenance and Operations	$724,368	$727,947	$834,162	$879,851
Security and Monitoring	$0	$4,103	$3,600	$0
Data Processing Services	$123,100	$145,304	$535,170	$133,039
Community Services	$0	$0	$190,062	$0
Principle on long-term debt	$0	$0	$0	$196,867
Debt Service	$96,049	$194,855	$120,495	$157,446
Capital Outlay	$0	$0	$340,672	$216,089
Payments to share service arrangements	$273,937	$206,798	$225,986	$165,008
Other governmental charges	$74,435	$72,087	$73,918	$73,081
Total Expenditures	**$8,411,286**	**$8,134,728**	**$9,713,468**	**$8,698,864**

NOTE: Amounts show actual financial data for school years 2013–14 to 2015–16 and budgeted financial data for school year 2016–17.
SOURCE: Texas Education Agency, Public Education Information Management System financial data, school years 2013–14 to 2016–17.

FIGURE 4–3
CORRIGAN-CAMDEN ISD GENERAL FUND BALANCE
SCHOOL YEARS 2014–15 TO 2016–17

CATEGORY	2014–15	2015–16	2016–17
Beginning Fund Balance	$2,556,336	$3,498,069	$3,112,262
Ending Fund Balance	$3,498,069	$3,112,262	$3,593,684
Increase/ (Decrease)	$941,733	($385,807)	$481,422
Percentage change from previous year	36.8%	(11.0%)	15.5%

SOURCE: Corrigan–Camden ISD annual financial reports, school years 2014–15 to 2016–17.

The Legislative Budget Board's School Performance Review Team selected three school districts, City View ISD, Keene ISD, and Roosevelt ISD, as peer districts for Corrigan-Camden ISD. Peer districts are school districts similar to Corrigan-Camden ISD used for comparison purposes. **Figure 4–4** shows the sources of the district's revenue by percentage of total revenue compared to peer districts for school years 2013–14 to 2016–17. Roosevelt ISD has a greater percentage of revenue from local sources than Corrigan-Camden ISD. The tax rate, set by the local district in accordance with the state taxation laws, drives local revenue.

Figure 4–5 shows that Corrigan-Camden ISD's tax rate is less than its peer districts' rates.

FIGURE 4–5
CORRIGAN-CAMDEN ISD TOTAL TAX RATE DATA COMPARED TO PEER DISTRICTS
TAX YEARS 2013 TO 2015

DISTRICT	2013	2014	2015
Corrigan-Camden ISD	**1.2000**	**1.1800**	**1.1800**
City View ISD	1.4200	1.4200	1.4200
Keene ISD	1.4909	1.4909	1.4300
Roosevelt ISD	1.2850	1.3100	1.3400

SOURCE: Texas Education Agency, Public Education Information Management System financial data, school years 2013–14 to 2015–16.

School districts in Texas are rated on two financial systems: the Financial Integrity Rating System of Texas (FIRST) and Smart Score. FIRST is the state's school financial accountability rating system intended to ensure that public schools are held accountable for the quality of their financial management practices and for the improvement of those practices. The goal of FIRST is to encourage Texas school districts to provide the maximum allocation possible for direct instructional purposes.

FIGURE 4–4
CORRIGAN-CAMDEN ISD REVENUE BY SOURCE COMPARED TO PEER DISTRICTS
SCHOOL YEARS 2013–14 TO 2016–17

DISTRICT PERCENTAGE OF REVENUE	SCHOOL YEAR 2013–14	SCHOOL YEAR 2014–15	SCHOOL YEAR 2015–16	SCHOOL YEAR 2016–17
Corrigan-Camden ISD				
State	**51.74%**	**49.75%**	**44.36%**	**38.37%**
Local	**34.29%**	**37.10%**	**41.50%**	**46.96%**
Federal	**13.96%**	**13.15%**	**14.14%**	**14.66%**
City View ISD				
State	64.50%	65.21%	68.21%	63.97%
Local	23.11%	21.97%	20.77%	22.72%
Federal	12.39%	12.81%	11.02%	13.30%
Keene ISD				
State	65.16%	66.50%	68.83%	68.02%
Local	27.13%	25.90%	23.51%	23.83%
Federal	7.71%	7.60%	7.66%	8.15%
Roosevelt ISD				
State	56.56%	55.41%	60.64%	65.79%
Local	34.80%	33.97%	27.52%	23.91%
Federal	8.64%	10.62%	11.83%	10.29%

NOTE: Totals may not sum to 100.0 percent due to rounding.
SOURCE: Texas Education Agency, Public Education Information Management System financial data, school years 2013–14 to 2016–17.

Figure 4–6 shows Corrigan-Camden ISD's FIRST rating compared to its peer districts for school years 2014–15 to 2016–17. Corrigan-Camden ISD received the same FIRST ratings as its peers during each of the previous three years.

FIGURE 4–6
CORRIGAN-CAMDEN ISD'S FINANCIAL INTEGRITY RATING SYSTEM OF TEXAS RATINGS COMPARED TO PEER DISTRICTS
SCHOOL YEARS 2014–15 TO 2016–17

DISTRICT	2014–15 (1)	2015–16 (2)	2016–17
Corrigan-Camden ISD	Pass	A	A
City View ISD	Pass	A	A
Keene ISD	Pass	A	A
Roosevelt ISD	Pass	A	A

NOTES:
(1) The 2014–15 Financial Integrity Rating System of Texas (FIRST) grading scale gave schools grades of either pass or substandard achievement.
(2) Beginning in the 2015–16 FIRST grading scale, A is equal to superior.
SOURCE: Texas Education Agency, Financial Integrity Rating System of Texas, school years 2014–15 to 2016–17.

The Smart Score, operated by Texans for Positive Economic Policy, is a ratings system that measures academic progress and financial spending at Texas' school districts and campuses. The Smart Score ratings range from one to five stars, with five stars indicating a district's success in combining cost-effective spending with the achievement of measurable student academic progress. Academic and spending ratings are very low, low, average, high, or very high. The district and campus Smart Score calculations use three-year averages to get more stable and persistent measures with less year-to-year volatility. The 2017 Smart Score results are based on data from school years 2013–14 to 2015–16. **Figure 4–7** shows Corrigan-Camden ISD's 2017 Smart Score ratings compared

to its peer districts. Corrigan-Camden ISD and City View ISD have the lowest Smart Scores in the comparison group. Corrigan-Camden ISD has the lowest academic progress.

The business manager and the superintendent oversee the district's asset and risk management activities, with support from the Business Office staff. The district keeps most of its idle cash in interest-bearing accounts, either at its depository bank or at the Lone Star Investment Pool (LSIP). The business manager transfers funds to the depository bank from the LSIP as needed to cover payroll and accounts payable checks.

Corrigan-Camden ISD staff have the option of choosing health insurance coverage through the Teacher Retirement System of Texas ActiveCare plan. Corrigan-Camden ISD staff are eligible to participate in a cafeteria plan for pretax benefits, pursuant to the U.S. Internal Revenue Code, Section 125. The law authorizes eligible staff to pay certain insurance premiums, including disability, accidental death and dismemberment, cancer and dread disease, dental, and additional term life insurance on a pretax basis. The district also offers group rates on dental, life, cancer, vision, and disability coverage through the First Financial Group of America, the district's third-party administrator. First Financial also provides online enrollment and consulting services for staff benefits.

Corrigan-Camden ISD uses the Texas Enterprise Information System (TxEIS) to manage financial transactions, including recording cash deposits and issuing disbursements, such as checks and direct deposits. TxEIS also has a PEIMS component that generates all state-mandated reports. Regional Educational Service Center XVI (Region 16) provides Corrigan-Camden ISD with support for TxEIS.

FIGURE 4–7
CORRIGAN-CAMDEN ISD'S TEXAS SMART SCORE DATA AND RANKINGS COMPARED TO PEER DISTRICTS
2017

DISTRICT	SMART SCORE	COMPOSITE ACADEMIC PROGRESS QUINTILE	SPENDING INDEX
Corrigan-Camden ISD	2	Very Low Academic Progress	Average Spending
City View ISD	2	Low Academic Progress	High Spending
Keene ISD	4	High Academic Progress	Low Spending
Roosevelt ISD	2.5	Average Academic Progress	High Spending

SOURCE: Texans for Positive Economic Policy, 2017 Smart Scores.

ACCOMPLISHMENT

♦ Corrigan-Camden ISD prepares a preliminary monthly payroll statement and sends it to all staff so that the payroll clerk can correct errors before final payroll.

FINDINGS

♦ Corrigan-Camden ISD lacks effective internal controls and segregation of duties in the human resources and payroll function.

♦ Corrigan-Camden ISD lacks an effective process to manage and safeguard district assets.

♦ Corrigan-Camden ISD lacks a process to monitor sufficiently the usage and the number of open charge accounts in the district.

♦ Corrigan-Camden ISD does not have adequate controls of cash management.

RECOMMENDATIONS

♦ **Recommendation 17: Review the roles, responsibilities, and duties of Business Office staff, and develop a system enabling the segregation of their duties to ensure effective internal controls to prevent fraud, theft, and financial impropriety in accordance with board policy.**

♦ **Recommendation 18: Develop and implement a comprehensive inventory process to guide the recording, inventorying, tracking, and disposal of all the district's assets.**

♦ **Recommendation 19: Determine which charge accounts should remain open and implement procedures for administering district charge accounts.**

♦ **Recommendation 20: Develop written cash-handling procedures and train all staff who handle funds in the proper use of those procedures.**

DETAILED ACCOMPLISHMENT

PAYROLL PREVIEW

Corrigan-Camden ISD prepares a preliminary monthly payroll statement and sends it to all staff so that the payroll clerk can correct errors before final payroll.

The statement shows the net pay, all deductions, and a schedule of vacation and sick days used and accrued. The payroll clerk distributes the payroll preview a week before the clerk submits the actual pay statement. This preview enables the staff to contact the Business Office with any necessary corrections. Business Office staff research discrepancies and make changes before they distribute the actual pay, minimizing financial and banking changes that could occur after the payroll clerk processes the pay statement.

DETAILED FINDINGS

SEGREGATION OF DUTIES (REC. 17)

Corrigan-Camden ISD lacks effective internal controls and segregation of duties in the human resources and payroll function.

Board Policy CAA (LOCAL) states, "The Superintendent or designee shall maintain a system of internal controls to deter and monitor for fraud or financial impropriety in the District." However, the Business Office does not properly segregate the human resources and payroll functions. Segregation of duties involves separating the initiation, approval, recording, and reconciling responsibilities for transactions.

The Business Office is staffed by a business manager who supervises the HR director and the accounts payable clerk. The business manager had performed all the human resources functions before the hiring of the HR director in July 2016. The business manager retains many HR responsibilities, which are not part of the position's job description, such as:

- receiving all new-hire documentation from the superintendent after the board approves the hiring;
- entering new-hire information in TxEIS;
- initiating and maintaining personnel files; and
- managing the workers' compensation program and staff benefits program.

The responsibilities of the HR director include the following:

- forecasting staffing needs and developing staffing plans;
- developing and implementing recruitment and retention strategies to include a screening and selection process for all staff;
- providing a system for new staff to acquire appropriate training;
- directing the administration of the district's compensation program including job descriptions;

- managing salary surveys, and positioning reclassifications;

- developing, implementing, administering, and monitoring procedures for salary administration and placement of new hires;

- overseeing management of the district's leave, health insurance, voluntary staff benefits, and workers' compensation;

- overseeing the district's staff relations;

- updating the staff handbook annually; and

- managing personnel records.

Additionally, the district has assigned payroll responsibilities to the position of HR director, such as:

- maintaining payroll registers and staff payroll information;

- calculating staff wages, salaries, hours worked, and overtime pay, and determining withholdings, deductions, and net pay;

- preparing paychecks and balancing payroll earnings and deductions;

- receiving and auditing time sheets for all district staff; and

- submitting payroll reports and forms to various federal and state agencies.

CCISD does not properly segregate the human resources and payroll functions. The business manager and the HR director each have full access to human resources, payroll, and accounts payable modules in CCISD's TxEIS financial system. This access enables these staff to enter a new hire and execute a payment to that staff. The CCISD Administrative Procedures Manual does not adequately segregate duties between the human resources function and the payroll function. According to onsite interviews with CCISD Business Office staff, the HR director has the ability to enter and adjust payroll data and to generate payroll.

The review team did not identify examples of improprieties nor indications of fraud, theft, or financial impropriety on the part of Business Office staff. However, no basic internal controls are in place to prevent such activity. Without effective internal control processes and procedures, staff have the ability to enter fictitious staff in the payroll system and send payments to personal bank accounts. Business

Office staff also could increase the rate of pay of an existing staff without proper authorization.

Segregation of duties is one of the most effective internal controls to help prevent staff errors and fraudulent activity. In a Cornell University finding on the improper segregation of the duties in a business department, it stated "segregation of duties is an internal control intended to prevent or decrease the occurrence of innocent errors or intentional fraud." The finding also noted that ensuring that no single individual has control of all phases of a single transaction or the transactions in a department establishes effective segregation of duties. Additionally, Cornell University's finding encourages departmental management to take a more active role to achieve separation of duties. This role includes checking the work completed by other staff; the knowledge that others will check their work is enough to prevent the possibility of fraud, theft, and financial impropriety.

The University System of Georgia (USG) acknowledges that, although a high level of segregation of duties is a best practice for which to strive, limited staff sizes often hinder achieving this goal. Effective business departments seek the best possible level of segregation of duties by verifying that no single staff performs both the authorization and verification or reconciliation functions for the same transactions. Additionally, according to USG, segregation of duties requires a process for managerial review.

Figure 4–8 shows a best practice checklist for maintaining internal controls in an organization's payroll process.

Corrigan-Camden ISD should review the roles, responsibilities, and duties of Business Office staff, and develop a system enabling the segregation of their duties to ensure effective internal controls to prevent fraud, theft, and financial impropriety in accordance with board policy. The district should eliminate the HR director's payroll duties, and remove the duties from the job description. The district should assign the HR director's payroll duties to the business manager. The district should also remove the HR responsibilities from the business manager and assign them to the HR director.

The district also should ensure that no staff performs as both an initiator and a processor for employee data and payroll. The district should develop operating procedures that segregate duties between the human resources function and the payroll function.

FIGURE 4–8
BEST PRACTICE CHECKLIST FOR PROTECTING INTERNAL CONTROLS OF PAYROLL

EMPLOYEE ACTION	STAFF RESPONSIBLE	FINAL REVIEW / APPROVAL
Responsible for modifying employee master file	❑	❑
Approves modifications to employee master file	❑	❑
Prepares payroll file for processing	❑	❑
Approves payroll file	❑	❑
Generates payroll checks	❑	❑
Distributes payroll checks or initiates direct deposits	❑	❑
Reviews and approves final payroll report	❑	❑
Records payroll expense in the general ledger	❑	❑
Reconciles payroll subsidiary module to the general ledger	❑	❑
SOURCE: University System of Georgia, Segregation of Duties Matrix, December 2016.		

Since the time of the onsite review, the district has restricted the access of the HR director to the Accounts Payable module. Additionally, the district has created a check on the process by requiring that the superintendent review a monthly payroll document.

The district could implement this recommendation with existing resources.

ASSET MANAGEMENT (REC. 18)

Corrigan-Camden ISD lacks an effective process to manage and safeguard district assets.

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

The Corrigan-Camden ISD Administrative Procedures Manual, written and maintained by the Business Office,

details procedures for: district federal programs and grants; finance and budgeting; accounts payable; payroll; purchasing; and property management. The manual is available on the Corrigan-Camden ISD Business Office webpage. The manual states that all federal purchases "will be traced with a sticker labeling the funding source and an inventory of each purchase. It is imperative that this information be processed in a timely manner and updated periodically." The manual also states that every campus principal will keep a record of assets on each campus. Fixed asset equipment that has a value of $500 or more or a useful life of more than one year should have an assigned accession (inventory) number. The manual specifies that staff must conduct an inventory every April, and any discrepancies will be reconciled.

However, in onsite interviews, staff reported that Corrigan-Camden ISD does not conduct an inventory of its fixed assets, including assets purchased with federal funding. The information technology (IT) director tags some technology purchases with the same tagging software used to tag library assets. The library uses the software to tag books and technology assets. Outside of the Technology Department and library, however, the district does not maintain an inventory listing of controlled assets with a value of less than $500. Corrigan-Camden ISD does not have a process to ensure that departments and campuses track these items accordingly. Campuses and departments follow purchasing procedures to order a district asset. When the campus or department receives the asset, staff do not affix an inventory tag on the asset or track its location.

Corrigan-Camden ISD's Business Office uses the TxEIS software package for the daily business functions of the department but does not use the TxEIS asset management

module. This module has an inventory listing report, which assists districts with maintaining all schedules, calculations, and distribution codes, including historical depreciation. The module also can retrieve items from the district's financial database automatically, mass-update inventory records, check in and check out inventory, establishes an audit trail on data files, and forecast replacement needs through a variety of asset management reports. However, at the time of the onsite review, Corrigan-Camden ISD was not using this module or these features. The Business Office keeps a financial record of assets, including initial cost and a depreciation schedule, using purchase information and data from the library and technology tagging software.

Without a process to tag and record all fixed assets, the district cannot track the location and use of assets accurately. Additionally, inventory records do not represent district assets accurately. Staff, guests, or unauthorized visitors could remove portable assets without the district knowing they are missing. Without a physical inventory, district records would help staff to identify missing or stolen inventory. In the event of fire or other disaster, the district would be unable to present an accurate inventory for insurance purposes.

According to onsite interviews, district staff could not recall any formal year-end inventory of assets. When assets become unusable, the district moves them to a barn located on the CCISD site. The district has sold unusable assets on social media, through a surplus property online auction company, and to individuals. Staff reported that no formal process is in place to decide when assets become surplus. Without a physical inventory, CCISD could be disposing of assets with remaining useful life, or carrying assets on its financial statements that should be treated as surplus. Reporting surplus items as usable assets could cause financial statement asset amounts to be overstated.

The Texas Comptroller of Public Accounts (CPA) has developed a fixed-asset best practices process to assist districts in developing an effective and efficient fixed-assets management system. These best practices represent a comprehensive solution to fixed-assets management. **Figure 4–9** shows CPA's fixed-asset inventory best practice. Corrigan-Camden ISD does not follow any of these best practices.

The Texas Association of School Business Officials (TASBO) provides training in best practices of fixed-asset management. TASBO's training workshop, Accounting for Fixed Assets, addresses the types of fixed assets and how properly to record

each type. The workshop also discusses other topics such as capitalization, valuation, and depreciation.

Corrigan-Camden ISD should develop and implement a comprehensive inventory process to guide the recording, inventorying, tracking, and disposal of all the district's assets.

The fixed-asset inventory process should include an efficient and effective tagging and tracking system that will identify, record, and track fixed assets. The district should expand the TxEIS modules in use in the district to include the asset management module. The business manager should evaluate the inventory and tagging system used for the library and some technology assets to determine the applicability of the system for all other district assets. District staff should affix tags to all assets upon receipt of the assets. The business manager should ensure that the district maintains one inventory list and conducts an annual inventory to confirm the location and condition of the asset. Corrigan-Camden ISD should contact other districts served by Region 6 that are using this module for advice, information, and counsel. The district should also determine whether Region 6 has an existing user support group for the asset management module that CCISD could join.

Corrigan-Camden ISD also should review its written procedures outlined in the district's Administrative Procedures Manual. The business manager should ensure that the procedures align with Corrigan-Camden ISD board policies for fixed-asset management.

The business manager should participate in the online asset management training that TASBO offers regularly. Corrigan-Camden ISD is a member of TASBO, and the training would be at no additional cost to the district. The campus principals and other central office staff also should take advantage of the TASBO trainings. Corrigan-Camden ISD should assess whether the district would require assistance to set up its initial fixed-asset system. The district should consider hiring a third-party company that specializes in fixed-asset inventory, tagging, and tracking. Corrigan-Camden ISD should make the decision after the district assigns inventory accounting and control to a specific staff, and after developing and implementing a program for managing fixed assets.

Since the time of the review, the business manager has worked with Region VI to train staff on using the asset inventory module in the TxEIS system.

FIGURE 4–9
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS BEST PRACTICES FOR FIXED ASSET INVENTORY
1999

Preliminary Steps

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

Creating the Fixed-asset Management System

- Adopt a proposal setting up the fixed-asset system, including adoption of formal policies and procedures.
- Develop positions and job descriptions for positions with fixed-asset responsibilities.
- Determine the structure of the fixed-asset inventory database and develop standard forms to match the format of computerized records.
- Provide training as necessary.
- Identify specific fixed assets below the capitalization threshold that should be tracked for information purposes and safeguarding.
- Budget the amount necessary to operate the fixed-assets management system adequately.

Implementing the Fixed-asset Management System

- Inform all departments of the requirements, policies, and procedures of the fixed-assets system.
- Ensure that assets to be tracked on the system have been identified and tagged.
- Enter information into the fixed-assets database.
- Assign appropriate values to the assets in the database.
- Establish location codes and custodial responsibility for fixed assets.

Maintaining the Fixed-asset Management System

- Enter all inventory information into the automated fixed-asset system as fixed assets are received.
- Assign tag numbers, location codes, and responsibility to assets as the district receives them.
- Monitor the movement of all fixed assets using appropriate forms approved by designated district personnel.
- Conduct periodic inventories and determine the condition of all assets.
- Generate appropriate reports noting any change in status of assets, including changes in condition, location, and deletions.
- Reconcile the physical inventory to the accounting records, account for discrepancies, and adjust inventory records.
- Use information from the system to support insurance coverage, budget requests, and asset replacements.

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

No fiscal impact is assumed for this recommendation. However, the district could incur costs if the district contracts with a third-party inventory-management company to complete the task. The cost of developing and implementing an effective and efficient inventory system cannot be determined until Corrigan-Camden ISD defines the scope of the implementation project.

CHARGE ACCOUNTS (REC. 19)

Corrigan-Camden ISD lacks a process to monitor sufficiently the usage and the number of open charge accounts in the district.

Corrigan-Camden ISD has several open charge accounts with area businesses. Open charge accounts refer to a line of credit, typically for less than $500, where district staff can purchase

items without completing a purchase order. Business Office staff use one purchase order for $500 and then draw against this amount as staff submit receipts for purchases to the accounts payable clerk. After the $500 balance in the purchase order is used, the accounts payable clerk issues a new one. Any charge of more than $500 requires the requestor to submit a purchase requisition to a campus principal or department head. If approved, the accounts payable clerk confirms the proper coding and signature on the purchase requisition. The business manager and superintendent then approve the requisition. Purchases on open accounts of less than $500 do not follow this procedure, increasing the risk that staff could make an inappropriate purchase with district funds because no position reviews the requested purchase. According to district staff during onsite interviews, several of the vendors have an authorized user list, but some do not.

Staff use the open charges to facilitate the purchase of gas and supplies, such as food, hardware, automobile parts, and tools. After staff submit receipts to the accounts payable clerk, the clerk reconciles the receipts with the billing from the businesses. The Administrative Procedures Manual states that open purchase orders or open accounts are "considered to cover a onetime single purchase per each purchase number assigned." By allowing staff to make several purchases against one open purchase order, CCISD is violating its procedures. **Figure 4–10** shows Corrigan-Camden ISD's 16 active open charge accounts at the time of the onsite review.

Having many open charge accounts with few controls could lead to waste, fraud, or abuse. Best practices for the use of charge accounts require a limited number of open accounts with few users and staff authorization for every purchase.

Corrigan-Camden ISD should determine which charge accounts should remain open and implement procedures for administering district charge accounts. The CCISD Administrative Procedures Manual states that staff must send charge slips or receipts to the Business Office as items are purchased. However, the manual has no provision for staff to obtain authorization before purchasing items on open charge accounts. The district should review existing open purchase order procedures and limit the number of staff who have the authority to make purchases on them. The district should require approval by the business manager, department director, or campus principal before making all purchases. The number of vendors with open purchase orders should be

limited. Staff should tie the items purchased to a work order with a specific need for tracking and verification.

The district could implement this recommendation with existing resources.

CASH HANDLING PROCEDURES (REC. 20)

Corrigan-Camden ISD does not have adequate controls of cash management.

The CCISD Business Office does not have written procedures for cash management and operations. The district relies on oral communication to ensure that district staff understand cash-management procedures. A variety of district staff handle cash for fund-raisers, athletic events, food service, and other district-authorized activities. Due to the lack of written cash-management procedures, practices for handling cash vary.

For football games, the district has implemented ticket sales tracking by using a prenumbered ticket system to reconcile ticket sales to amounts deposited. However, the district has not implemented this ticket sale procedure for all athletic events, including basketball and volleyball games. After a football game, the gate workers count the cash box with an assistant principal. The assistant principal takes the deposit to the bank's night depository. The accounts payable clerk picks up the deposit the following day, takes it back to the Business Office and recounts it. The accounts payable clerk then deposits it in the bank.

FIGURE 4–10
CORRIGAN-CAMDEN ISD ACTIVE OPEN CHARGE ACCOUNTS
SEPTEMBER 2017

ABC Auto Parts retail	Longhorn Bus Sales
Beaumont Freightliner trucks sales, parts retail, and service	Lowe's home improvement retail
Brookshire Brothers grocery and retail	O'Reilly Auto Parts retail
Burris Farm and Home retail	Sam's Club wholesale retail
Coca-Cola beverage distributor	Shell/Conoco gas stations
Dixie Paper janitorial and office supplies	Swicegood Music Company rental and retail
Eaton's Hardware retail	TxBurger/Subway restaurants
Grainger industrial supplies	Vend-Buffet vending machine supplier

Source: Corrigan-Camden ISD, September 2017.

For events other than football games, the administrator on duty collects the cash box, locks it in the athletic field office, and brings it to the accounts payable clerk the following day. The administrator on duty is usually the boys' athletic director or the girls' athletic director. The accounts payable clerk counts the cash box, gives the administrator a receipt, and deposits the cash in the Business Office vault. Other campus fund-raisers follow a similar procedure.

Corrigan-Camden ISD's food service staff also handle cash when students pay for meals. Food service staff have no cash-handling procedure manual. Any staff may volunteer to be a cashier, and is the position has no formal cashier training. According to onsite interviews, in each cafeteria, cashiers count their own registers at the end of the day, count the total amount of all registers, and give the total to the cafeteria manager, who makes the deposit. Business Office staff do not reconcile the deposited amounts with cash register sales entries to verify that staff have deposited all funds collected. Without a consistent cash-handling process, the district is at risk of possible theft or loss of funds. Best practices for cash handling include having sponsors submit funds in sealed deposit bags or counting the funds in the presence of the staff with cash-handling responsibilities. Staff are given receipts when delivering bags or counting money. Furthermore, a ticket-numbering system, such as the one recently enacted for football games, is an effective method for improving cash control. A ticket-numbering system verifies the actual number of tickets sold and the amount of cash collected.

Other districts have strong controls for cash. For example, Copperas Cove ISD uses sealed deposit bags for all of its daily cash deposits. The district provides tamper-proof deposit bags to all staff who deposit funds. All of the district organizations use this process, including the Food Service Department. The sponsor counts the deposit, completes a numbered deposit slip, and places both the deposit and the deposit slip in a deposit bag and seals it. The campus bookkeeper receives the sealed deposit bag, and the sponsor receives a receipt. The campus bookkeeper then seals the deposit bags and places them in a locked bank bag that the bookkeeper delivers to the bank. The bank unlocks the bank bag, counts the funds, matches them to the deposit slip, and deposits them in the account indicated on the deposit slip.

Corrigan-Camden ISD should develop written cash-handling procedures and train all staff who handle funds in the proper use of those procedures. The cash-handling procedures should detail the proper process for handling cash at the campus level, at extracurricular events, and in the Food Services Department. When developing the procedures, the district should consider using tamper-evident deposit bags and two-part, double-roll tickets for athletic events. The training for cash handling should include campus secretaries, extracurricular event ticket sellers, and food service cashiers. The business manager should conduct training at the start of the school year.

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 should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 4. BUSINESS SERVICES							
17. Review the roles, responsibilities, and duties of Business Office staff, and develop a system enabling the segregation of their duties to ensure effective internal controls to prevent fraud, theft, and financial impropriety in accordance with board policy.	$0	$0	$0	$0	$0	$0	$0
18. Develop and implement a comprehensive inventory process to guide the recording, inventorying, tracking, and disposal of all the district's assets.	$0	$0	$0	$0	$0	$0	$0
19. Determine which charge accounts should remain open and implement procedures for administering district charge accounts.	$0	$0	$0	$0	$0	$0	$0
20. Develop written cash-handling procedures and train all staff who handle funds in the proper use of those procedures.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 5. SAFETY AND FACILITIES MANAGEMENT

One of the stated objectives of public education in the Texas Education Code is to "provide safe and disciplined environments conducive to learning." To achieve this objective, safety and security operations go hand-in-hand with education, as districts are responsible for protecting students, teachers, and school property while also providing a positive learning environment. Working together, district leaders, campus principals, facility managers, transportation supervisors, and safety and security staff look for ways to identify risks and develop plans to mitigate threats.

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

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

Corrigan-Camden ISD (CCISD) has three educational facilities – an elementary school, junior high school, and high school – a sports stadium, and a transportation facility. The junior high school, high school, sports stadium, and transportation facility are located on the same campus. The district also owns and maintains three rental houses adjacent to the high school that are rented to district teachers. **Figure 5–1** shows the original date of construction for each of the district's campuses along with dates of additions or major renovations that have been made.

FIGURE 5–1
CORRIGAN-CAMDEN ISD CAMPUS CONSTRUCTION, RENOVATIONS, AND ADDITIONS
2017

FACILITY	ORIGINAL CONSTRUCTION	ADDITIONS OR MAJOR RENOVATIONS
Elementary School Campus	1986	1990, 2015 (2)
Junior High School Campus (1)	1978	1980, 1983, 1990, 1992, 2010, 2015 (2)
High School Campus (1)	1970	1986, 1995, 1998, 2004, 2012, 2015 (2)

NOTES:
(1) The junior high school and the high school are located on the high school campus in separate buildings.
(2) The district reported that a bond election was held and passed in May 2015 and that major renovations were performed on all campuses with a focus on safety and security.
SOURCES: Legislative Budget Board School Performance Review Team; Corrigan-Camden ISD, October 2017.

The square footage of CCISD's buildings totals more than 263,419 square feet across 20 acres of land. The district's Operations Department handles the maintenance function of the district and is managed by an operations director with two maintenance technicians, an administrative assistant, and one part-time groundskeeper. **Figure 5–2** shows the organization of CCISD's Operations Department.

FIGURE 5–2
CORRIGAN-CAMDEN ISD OPERATIONS DEPARTMENT ORGANIZATION
SCHOOL YEAR 2017–18

SOURCES: Legislative Budget Board School Performance Review Team; Corrigan-Camden ISD, October 2017.

Custodial functions are managed by the assistant principals on each campus and are not a part of the Operations Department. The district employs 12 custodians across the three campuses.

Figure 5–3 shows a comparison between CCISD's and peer district facilities maintenance and operations costs as reported in their Comprehensive Annual Financial Reports to the Texas Education Agency (TEA) ending August 31, 2017. Peer districts are Texas school districts similar to CCISD that are used for comparison purposes. CCISD's annual maintenance, grounds, and custodial expenditures are less than the peer districts.

The district has no school resource officer, and no staff is assigned to oversee the district's safety and security functions. CCISD's safety and security operations are managed by campus principals in coordination with the local police department. The Corrigan Police Department chief stated that his department is the first responder for the district and that response time for each campus is almost immediate given the size of the district and town.

FINDINGS

♦ CCISD lacks a process to manage, monitor, and implement emergency operations procedures.

♦ CCISD lacks a process to analyze, plan, and implement facility maintenance and improvements across the district.

♦ CCISD's informal and inconsistent system for maintenance requests does not support financial planning, staff performance measurement, or facility planning.

♦ CCISD has not established standards or methods to determine the number of custodians needed at each campus.

RECOMMENDATIONS

♦ **Recommendation 21: Develop districtwide and campus-based emergency documents, including an updated emergency operations plan, and consistently implement required drills.**

♦ **Recommendation 22: Develop and implement a comprehensive facilities plan and a prioritized preventive maintenance schedule and budget.**

♦ **Recommendation 23: Develop and implement a formal work-order system to request, prioritize, and track maintenance requests.**

♦ **Recommendation 24: Develop and implement a staffing model based on industry standards to better manage the distribution of work among campus custodians.**

EMERGENCY OPERATIONS PLAN (REC. 21)

CCISD lacks a process to manage, monitor, and implement emergency operations procedures.

The district requires campus visitors to check in at a secure, main entrance before entering any building. District staff scan visitors' identification cards using an electronic visitor management system to check the visitors' backgrounds. No central camera system is in place to monitor activities on each individual campus. Each campus uses a combination of keys and electronic locks for different staff and buildings. The district has no consistent and controlled locking system. Safety issues are handled by individual campus principals and staff. The district uses an electronic application that alerts staff if there is an emergency or safety-related issue on a campus.

FIGURE 5–3
CORRIGAN-CAMDEN ISD FACILITIES MAINTENANCE AND OPERATIONS EXPENDITURES COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2016–17

DISTRICT	PLANT MAINTENANCE AND OPERATIONS (1)	PERCENTAGE OF TOTAL BUDGET	STUDENTS	COST PER STUDENT
Corrigan-Camden ISD	**$879,851**	**10.1%**	**917**	**$959**
City View ISD	$1,357,554	13.2%	1,003	$1,353
Keene ISD	$905,359	9.5%	1,057	$857
Roosevelt ISD	$1,195,612	13.1%	1,064	$1,124

NOTE: Maintenance and operations are defined as expenditures used to keep the physical plant (buildings) and grounds open, clean, comfortable, in effective working condition, and in a good state of repair. This expenditure includes all maintenance, grounds, and custodial budgets.
SOURCE: Texas Education Agency, Comprehensive Annual Financial Report, school year 2016–17.

A major safety issue for the district is that the high school and junior high school campus is located on a highway. A railroad line also runs in close proximity to the schools.

The Texas Education Code, Section 37.108, requires each school district to adopt and implement a multihazard emergency operations plan (EOP) for use in the district's facilities. This plan must address emergency mitigation, preparedness, response, and recovery. The Legislative Budget Board's School Performance Review Team conducted an onsite visit to CCISD in October 2017. During onsite interviews, CCISD staff indicated that the district has an EOP; however, the EOP is not updated, and staff were uncertain when the EOP was last revised.

The Texas Education Code, Section 37.108, requires that a district's EOP must provide for:
- district employee training in responding to an emergency;

- mandatory school drills and exercises to prepare district students and employees for responding to an emergency;

- measures to ensure coordination with the Texas Department of State Health Services and local emergency management agencies, law enforcement, health departments, and fire departments in the event of an emergency;

- implementation of a safety and security audit every three years; and

- a policy for responding to a train derailment near a district school if the school is located within 1,000 yards of a railroad track, as measured from any point on the school's real property boundary line.

CCISD's EOP does not meet all of these statutory requirements. For example, during onsite interviews, no CCISD staff indicated that they received emergency preparedness training or were aware of any schedule of available trainings on how to respond to emergencies. According to the superintendent, each year there is a districtwide staff review of the application used by the district for emergency situations. The superintendent also reported that active shooter training was completed with the entire district in August 2016.

Additionally, the district's EOP did not include a schedule of mandated emergency drills. CCISD staff also stated that emergency preparedness drills, which sometimes include

monthly fire drills and occasional lockdown and inclement weather drills, are administered at the discretion of the campus principals. As of the time of the onsite review, none of CCISD's campuses had conducted any drills during school year 2017–18. The district also has no drill schedule or logs to determine the timing and frequency of drills. During onsite interviews, the superintendent acknowledged that the district does not regularly conduct emergency drills and that this is an area the district needs to improve.

The district performed a safety and security audit in 2014. According to the audit report, the district had adopted an EOP. However, the audit report states that district had not conducted lockdown drills, weather drills, shelter-in-place drills, or reverse evacuation drills. The district also conducted a safety and security audit in 2017, but no information from that audit was available to the review team because the report has not been published and made available to TEA.

According to the City of Corrigan Police Department, an interlocal agreement with the district is not officially in place. The city and district have developed a verbal agreement for first-responder actions to address day-to-day needs; however, this understanding primarily relates to hours of operation and after-hours patrolling of facilities. The district has not engaged with local first responders to develop a plan of action for emergency events. The district also has not provided floor plans, site plans, and other general facility information to the city for use by local and regional first responders to manage and coordinate responses in the event of an emergency at a district facility.

Figure 5–4 shows a comparison between legislative requirements for a district's EOP and CCISD practices.

School districts continually face natural and human-made emergencies that vary in severity, duration, and fiscal impacts. The district's lack of an updated EOP that meets all statutory requirements results in staff being uninformed and untrained in the best practices to employ during an emergency. This lack of information could result in the escalation of consequences. Failure to provide floor plans, site plans, and other general facility information may negatively affect first responders' ability to respond to emergencies in the most effective and expeditious manner. For example, in an active shooter scenario, floor plans would provide first responders an accurate map of school facilities to plan appropriate action based on the location of the events.

Emergency operations plans help to ensure student and staff safety, reduce the loss of life and property, and maintain

FIGURE 5–4
EMERGENCY OPERATIONS PLAN REQUIREMENTS COMPARED TO CORRIGAN-CAMDEN ISD PRACTICES
SCHOOL YEAR 2017–18

REQUIREMENT	CORRIGAN-CAMDEN ISD
District employee training in responding to an emergency	No formalized training is provided to staff.
Mandatory school drills and exercises to prepare district students and employees for responding to an emergency	Not performed.
Measures to ensure coordination with the Texas Department of State Health Services and local emergency management agencies, law enforcement, health departments, and fire departments in the event of an emergency	Verbal agreement with local law enforcement and fire departments. No formal agreement.
Implementation of a safety and security audit as required by the Texas Education Code, §37.108 (b)	The district conducted a safety and security audit in 2017.
A policy for responding to a train derailment near a district school if the school is located within 1,000 yards of a railroad track, as measured from any point on the school's real property boundary line	No policy in place.

SOURCES: Legislative Budget Board School Performance Review Team, October 2017; the Texas Education Code, Section 37.108.

positive learning environments for students. Regional Education Service Center VI offers a guideline and template for developing a comprehensive EOP.

The Texas School Safety Center (TxSSC) assists districts with safety initiatives and mandates. The Texas Education Code, Section 37.108, requires school districts to conduct mandatory emergency drills; however, the statute does not identify specific drills or exercises that districts must perform. According to TxSSC, districts must identify in their EOPs the type and frequency of emergency preparedness drills for each district facility. CCISD's EOP does not include a schedule of mandated drills. TxSSC considers the drills and exercises documented in the EOP to be the mandatory drills for the purposes of compliance with the statute.

To assist districts in developing and implementing an effective school drill schedule, TxSSC offers a School-based Emergency Management Toolkit. This resource helps to support an EOP, regular training, drilling, and exercising coordination with state and local partners, ongoing safety and security assessments, and the establishment of a district safety and security committee.

Figure 5–5 shows TxSSC's best practices for conducting school drills.

CCISD should develop districtwide and campus-based emergency documents, including an updated emergency operations plan, and consistently implement required drills.

To implement this recommendation, CCISD should identify staff to serve as the district's safety and security lead. The safety

and security lead, along with the superintendent, should implement the following key steps:

- Update the district's EOP to meet all the requirements of the Texas Education Code. The plan should contain a hazard assessment and procedures that outline the appropriate response(s) to any type of emergency that could occur, whether it is caused by natural, technological, or human-made events. The emergency operations plan should contain common language and structure and provide conceptual framework for flexible and coordinated multiagency response. The district should map the plan to the specific district and campus hazards and resources;

- Develop training, drilling, and exercising plans. The district should conduct emergency preparedness training to address five situations, and should indicate the frequency of drills. The five situations should include evacuation, reverse evacuation, lockdown, shelter in place, and severe weather responses;

- Provide training for selected district staff regarding best practices for school-based safety and security. The training should include information regarding how to best conduct and lead safety drills and exercises, and how to respond in cases of emergency; and

- Formulate a memorandum of understanding interlocal agreement with local emergency response personnel. Involvement with local emergency staff could support the collaboration among the agencies and jurisdictions by addressing assistance requirements, staff support,

FIGURE 5–5
TEXAS SCHOOL SAFETY CENTER BEST PRACTICES FOR SCHOOL DISTRICT EMERGENCY DRILLS

DRILL	FREQUENCY (MINIMUM)	GUIDANCE
Fire/Evacuation	One fire drill each month that has 10 or more school days (including summer school), including one drill within 10 days of the beginning of classes (the Texas Administrative Code, Title 19, §61.1036)	• One announced drill (during first two weeks of new school year) • One obstructed drill each semester • One drill with special circumstances (scheduled during lunch, class change time, accountability/reunification issues, functional needs, etc.) • Test evacuation procedures not usually addressed during fire drills. (Check with your local fire department about receiving fire drill credit for this drill)
Recommended Practices		
Lockdown	One drill each semester and each summer school session	• Allow time after the drill for teachers and students to talk about options and safety considerations • Provide ways for staff to share their own concerns and those of their students with administrators
Reverse Evacuation	One drill each semester and each summer school session	
Severe Weather/ Tornado	One drill each semester and each summer school session	
Shelter-in-place (Hazmat)	One drill each semester and each summer school session	

NOTE: Consider conducting this drill in combination with other drills
SOURCE: Texas School Safety Center, Training, Drilling, and Exercising Toolkit, 2017.

equipment usage, and identification of specialized expertise.

Since the time of the review, the district states that it is working with the local constable and county to develop a memorandum of understanding for contracted security services for school year 2018–19. The constable and superintendent are developing the MOU in conjunction with the Polk County judge and Commissioner's Court.

The district could implement this recommendation with existing resources.

FACILITIES PLANNING AND MAINTENANCE (REC. 22)

CCISD lacks a process to analyze, plan, and implement facility maintenance and improvements across the district.

The district has not developed or implemented a schedule to ensure staff perform routine work on facilities. During the onsite visit, the review team found no evidence that the district conducts regular audits and inspections of district facilities. The superintendent, campus principals, and operations director do not conduct scheduled walk-throughs of the facilities to determine maintenance priorities.

Additionally, CCISD has not engaged in any long term facilities planning. For example, the district has not conducted a districtwide facility needs assessment to assess facility conditions and evaluate future capital needs. The district also does not have a long-range facility master plan. A long-range, comprehensive facilities master plan outlines the current status and future use of district facilities. It guides the development of capital improvements and equipment replacement, and supports planning for bond elections. Based on interviews with the operations director, the district has never had a facilities maintenance or master plan. District staff reported that prior to the May 2015 bond election, CCISD worked with a construction contractor to complete a facility study to develop the short and long-term priorities related to the district's facilities. However, the study was not provided to the review team and the operations director did not mention the study as a resource used in facilities planning.

Instead, maintenance operations at CCISD are performed in a reactive rather than proactive manner. Reactive maintenance includes repairs that are done when equipment has broken down. Reactive maintenance focuses on restoring the equipment to its normal operating condition. Reactive maintenance defers repairs and enables damage to

accumulate, compounding an organization's problems. The district does not budget for preventive maintenance. During onsite interviews, the superintendent indicated that the facilities budget is developed based on historical data from previous budgets and that "reservation lines" (i.e., unknown expenses) are included in the budget to account for unforeseen events such as equipment failure.

Without an understanding of the facilities or a long-range facility plan, catastrophic failure of the building systems could occur, requiring emergency funding or the initiation of unplanned capital improvement projects. For example, if heating, ventilation, and air-conditioning systems are not replaced at the end of their useful lives, failures could occur, and the district could be forced to replace multiple units. The failure of a roof system leads to water infiltration into the building. Eventually, these leaks could result in mold growth that endangers occupant health or could cause structural degradation. In either case, the cost to replace the roofing system could be compounded to address the consequential damages.

An effective maintenance program develops and implements a long-term facilities master plan. This plan helps to ensure that building projects are prioritized, begun, and completed according to a studied, developed, and logical process. Additionally, it ensures that the district is planning appropriately for the population it will serve in the future. As board and district leadership changes, having a long-term facilities master plan adds stability and cohesiveness to the district's construction, use, and management of facilities. TEA provides districts with a recommended planning model

for facilities. **Figure 5–6** shows TEA's recommended program elements for districts to develop a well-documented and comprehensive master-planning approach to facilities.

One element of an effective long-range facilities master plan is conducting a facilities needs assessment. Planning Guide for Maintaining School Facilities, published by the National Forum on Education Statistics in 2003, and similar resources are available to assist school districts with the development of an effective districtwide facility needs assessment process. These plans serve to protect a school district's most costly assets and to ensure that the needs of the educational programs are met. Regular inspection of school facilities ensures that the condition of district buildings, systems, and sites is clearly understood and documented. An annual audit provides multiple benefits, including the following:

- ensures that failures or faults in a building's components or systems are caught in time for repairs to be made in lieu of a total replacement, serving to reduce or control maintenance costs;

- helps to establish preventive maintenance protocols and schedules; and

- provides the basis for long-range planning.

The final element of an effective long-range facilities master plan is developing and implementing a preventive maintenance schedule. The scheduling process begins with an audit of the buildings, grounds, and equipment. After facilities data have been assembled, structural items and pieces of equipment can be selected for preventive maintenance. Preventive maintenance scheduling and

FIGURE 5–6
SAMPLE LONG-RANGE FACILITIES MASTER PLAN ELEMENTS

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

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

planning will not prevent all work orders for repairs, but they can reduce the frequency and number of repairs submitted.

Figure 5–7 shows a sample preventive maintenance schedule.

CCISD should develop and implement a comprehensive facilities plan and a prioritized preventive maintenance schedule and budget.

The district should evaluate each major building system and its anticipated life expectancy, and develop a long-range facility maintenance program to plan for replacement at the end of the systems' useful lives. To effectively develop a facilities master plan, CCISD should adopt a formal facility master planning process. This process is necessary to ensure that the district could maintain its facilities within available funding and at a level that supports an effective educational program. Using input from the operations director, campus principals, the custodial and maintenance staff, and the superintendent, the district should begin the process of determining improvements. Key steps and considerations in developing the facilities master plan include the following:

- conduct a comprehensive, districtwide facilities assessment to determine the status of buildings and systems and identify needs;

- review and analyze any ongoing maintenance work to validate its necessity;

FIGURE 5–7
SAMPLE PREVENTIVE MAINTENANCE PROGRAM FOR FACILITIES

AREA	COMPONENT	INSPECTION AND REPAIR (EVERY 3 MONTHS TO 6 MONTHS)	INSPECTION AND REPAIR (ANNUAL)	INSPECTION AND REPAIR (EVERY 2 YEARS TO 5 YEARS)	INSPECTION AND REPLACEMENT (EVERY 7 YEARS TO 10 YEARS)	INSPECTION AND REPLACEMENT (LIFE OF 12 YEARS TO 15 YEARS)
Exterior	Roof		✓	✓		✓
	Roof Drainage		✓	✓		
	Windows and Glass		✓	✓	✓	
	Masonry		✓	✓		
	Foundations		✓			✓
	Joints and Sealants		✓		✓	
Equipment	Belts and Filters	✓				
	Motors and Fans	✓		✓		✓
	Pipes and Fittings	✓			✓	
	Ductwork		✓		✓	
	Electrical Controls		✓		✓	
	Heating Equipment	✓			✓	
	Air-conditioning Equipment	✓			✓	
Interior	Doors and Hardware		✓			✓
	Wall Finishes		✓			✓
	Floor Finishes		✓		✓	
Site	Parking and Walks		✓	✓		
	Drainage		✓	✓		
	Landscaping	✓			✓	
	Play Equipment		✓		✓	

SOURCE: Legislative Budget Board School Performance Review Team, October 2017.

- determine the training necessary to ensure that maintenance staff members could implement and support planned improvements;

- establish facility priorities to maintain the district's facility investments and educational programming priorities;

- identify funding sources for the work; and

- implement a process to continue monitoring the plan.

As part of the facilities planning process, CCISD also should develop a preventive maintenance schedule and budget. A committee including the superintendent, operations director, business manager, and campus principals should develop this schedule and budget. Other key staff and stakeholders should serve as a resource to assist this committee. The business manager should establish a line item in the budget to fund the schedule's implementation. After the schedule and budget are developed, the operations director and the business manager should present the preventive maintenance schedule and proposed annual budget to the board for discussion and approval. The preventive maintenance committee annually should review and update the schedule and budget request, and present them to the board. Additionally, the superintendent, campus principals, and operations director should conduct scheduled walk-throughs of each campus and district facility at least once a year to assist in determining needed maintenance repairs.

The district could implement this recommendation with existing resources.

WORK-ORDER SYSTEM (REC. 23)

The district's informal and inconsistent system for maintenance requests does not support financial planning, staff performance measurement, or facility planning.

CCISD does not use a formalized work-order system to manage maintenance. When CCISD staff have maintenance requests, they manually complete request forms or submit the requests by e-mail to the operations director or the administrative assistant. The operations director handles the repairs himself or delegates them to one of the two maintenance technicians. The operations director uses no established process to determine which requests are delegated and which he completes himself. He delegates at his own discretion.

The Operations Department collects all written maintenance requests and prints all e-mail requests. The operations director files all open work orders in his office. Verbal requests are often not written and included with the other requests. When work orders are completed, the operations director files them as closed work orders. CCISD was not able to provide the number of work orders completed in the last school year.

CCISD's work-order process does not include notification of receipt to the requestor, estimated time of work commencement, information to detail the work performed, or corrective action taken. The request forms also do not provide any indication of a supervisor's review of the work. The district does not leverage the work-order requests to identify potential larger facility issues, track staff productivity, implement a preventive maintenance plan, or schedule annual or semiannual custodial projects. During onsite interviews, CCISD staff indicated that they believe the work-order process takes longer than it should.

Without a formal work-order system, the district is unable to capture data to analyze costs or measure staff performance. The work-order system does not provide the necessary information to make data-driven decisions to guide long-term maintenance and operations planning. The absence of this data prevents the district from identifying high-need campus facility and equipment repairs and building areas with systemic problems, or from tracking staff's ability to address identified issues.

According to Best Practices Maintenance Plan for School Buildings, published by the Idaho Department of Education in 2006, the best practice for school districts is to use work-order systems to process maintenance work, whether the job originates as a problem communicated by building users or as part of planned maintenance projects. A work-order system provides uniformity in planning maintenance jobs and helps to prioritize job requests that maintenance staff typically face. Using work orders for preventive maintenance tasks helps to ensure that this work is not abandoned among multiple maintenance jobs.

A bulletin published in 2003 by the University of Tennessee Municipal Technical Advisory Service describes a properly structured work-order system. Such a system requires manager preapproval of work requests and captures labor, material, and equipment costs by job. Work orders begin with a request for repairs or maintenance that is routed to the appropriate personnel authorized to approve work orders.

After authorization, the work request is recorded as a work order, then signed by the manager. A well-structured work-order form includes the manager's directions, specific instructions, and recommendations. The work-order form is a multipart document with a copy for the manager and copies for the work supervisors for assignment, purchasing, and accounting. After the manager signs the work order, the work supervisor receives each work order and assigns personnel to the jobs. The work order could have a written description of the request for assistance and the location. The date of completion is noted on the work order, along with any description of how the job was completed. The manager could retain supervisory control by reviewing uncompleted work orders or the work-in-progress file. When the job is completed, the work order is closed and filed separately from the open work orders. Closed or completed work orders could be filed and cross-referenced for later review, such as when preparing the following year's budget.

After authorization, a copy of the work order is sent to the finance department. The finance department codes the work order so that all the accrued costs of labor, materials, equipment, and overhead are charged to the proper departments. The finance department could produce monthly work-order reports. These reports list all labor, materials, equipment, and overhead costs for every job work-order number. Work-order reports provide management with a lot of timely information. At a glance, a manager could see who worked on what jobs; the amount and type of materials used; the equipment used; and which jobs were completed. In this way, more sophisticated work-order systems provide information for equipment needs and measure worker productivity.

Many districts use automated or electronic work-order systems to retain and manage their maintenance information. An electronic system enables instant data analysis and tracking of multiple evaluation factors. The system also supports the annual budget process because it enables managers to compare budgeted costs to actual costs and evaluate department performance. Information regarding maintenance histories could help determine equipment's expected remaining life spans. Trend data regarding maintenance and repair costs provide useful information for estimating budget items.

CCISD should develop and implement a formal work-order system to request, prioritize, and track maintenance requests.

The operations director should conduct a cost-benefit analysis to determine if purchasing an electronic system is cost-effective, or if the district should improve its manual work-order process. In either case, the operations director should ensure that work orders contain manager preapproval and authorization of work requests, a written description of work requests and the locations, and specific instructions. Work orders should show a date of completion, a description of how the job was completed, and labor, material, and equipment costs.

The operations director should develop a process for reviewing open work orders to monitor progress, and should develop a process to review monthly work-order reports to evaluate staff performance and determine equipment needs. Through this process, the district could identify projects that could be accomplished within the annual budgeting process, and could identify projects that could need greater financial support. The operations director should incorporate the information compiled from this process into the work-order system to provide CCISD with the tools for monthly, annual, and long-term decisions and oversight.

The cost associated with this recommendation cannot be determined at this time. The district will need to research and prioritize work-order management systems and the associated costs for the software, implementation, and training.

CUSTODIAL STAFFING (REC. 24)
CCISD has not established standards or methods to determine the number of custodians needed at each campus.

The district employs 10 custodians. CCISD has four full-time and two part-time custodians at the elementary school campus, two full-time custodians at the junior high school campus, and three full-time custodians at the high school campus. The majority of cleaning is conducted from 7:00 am to 5:00 pm. The custodians work in staggered shifts during this period. Custodians occasionally work overtime, which requires preapproval by the campus principals. The custodian's daily activities are supervised by the assistant principals at each campus, and, as a result, the custodial tasks differ depending on the needs of the campus. According to interviews with the superintendent and campus principals, the district does not use a staffing formula to determine the number of custodians on each campus. During onsite interviews, CCISD staff indicated that campus principals hire custodial staff for their respective campuses. All principals stated that their campuses have maintained the same number

of custodians for as long as any of them could remember. Principals stated that they believe custodial staffing levels are sufficient. However, no campus principal has conducted an analysis to determine the number of custodial staffing positions that are appropriate for their campus based on the square footage of their campuses. The principals also have not analyzed the custodians' roles and responsibilities related to their duties.

The Texas Association of School Boards (TASB) recommends staffing at 19,000 adjusted square feet per custodian, calculating adjusted square footage at 95.0 percent of actual square-foot area. TASB recommendations use full-time-equivalent (FTE) positions in its staffing calculations. FTE positions equal the hours worked by one staff on a full-time basis. For the purposes of this calculation, TASB assumes a 40.0-hour work week, and 1.0 FTE position is equal to one full-time staff.

Figure 5–8 shows the number of custodians assigned to each CCISD campus and the number that would be assigned based on the TASB standards. Overall, the district employs 1.5 fewer FTE positions than the TASB standard suggests at the high school and 0.3 less position at the junior high school.

CCISD should develop and implement a staffing model based on industry standards to better manage the distribution of work among campus custodians.

The campus assistant principals should make a proposal to adjust the number of custodians at the high school based on the TASB formula and their knowledge of the conditions at each campus. The high school principal should discuss the proposal with the superintendent, and they should decide on appropriate staffing levels.

The fiscal impact assumes developing one full-time custodial position and one part–time custodial position at the high school. The fiscal impact does not assume an additional position to address the 0.3 full-time-equivalent position recommended by TASB for the junior high school; it assumes custodians from other campuses could assist if an additional need exists. The cost to the district would be $29,600, including $19,734 (1.0 full-time custodian x $11.42 median wage per hour x 40.0 hours a week x 36 school weeks per year = $16,445 + 20.0 percent of salary for staff benefits) plus $9,866 (1.0 part-time custodian x $11.42 median wage per hour x 20.0 hours per week x 36 school weeks per year = $8,222 + 20.0 percent of salary for staff benefits).

FIGURE 5–8
CORRIGAN-CAMDEN ISD (CCISD) CUSTODIAL STAFF ALLOCATION COMPARED TO INDUSTRY STANDARDS
SCHOOL YEAR 2016–17

FACILITY	GROSS SQUARE FEET	CCISD CUSTODIAL POSITIONS (1)	INDUSTRY STANDARD POSITIONS	ADDITIONAL POSITIONS NEEDED BASED ON INDUSTRY STANDARDS
Elementary school	115,558	6	6.0	0.0
Junior high school	62,638	3	3.3	0.3
High school	85,223	3	4.5	1.5
Total	**263,419**	**12**	**13.8**	**1.8**

NOTE: (1) Full-time-equivalent position assumes a 40.0-hour work week.
SOURCES: Legislative Budget Board School Performance Review Team; Corrigan-Camden ISD; Texas Association of School Boards, Custodial Industry Standard Chart, October 2017.

FISCAL IMPACT

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

RECOMMENDATION	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 5. SAFETY AND FACILITIES MANAGEMENT							
21. Develop districtwide and campus-based emergency documents, including an updated emergency operations plan, and consistently implement required drills.	$0	$0	$0	$0	$0	$0	$0
22. Develop and implement a comprehensive facilities plan and a prioritized preventive maintenance schedule and budget.	$0	$0	$0	$0	$0	$0	$0
23. Develop and implement a formal work-order system to request, prioritize, and track maintenance requests.	$0	$0	$0	$0	$0	$0	$0
24. Develop and implement a staffing model based on industry standards to better manage the distribution of work among campus custodians.	($29,600)	($29,600)	($29,600)	($29,600)	($29,600)	($148,000)	$0
TOTAL	**($29,600)**	**($29,600)**	**($29,600)**	**($29,600)**	**($29,600)**	**($148,000)**	**$0**

CHAPTER 6. FOOD SERVICES

An independent school district's food service operation provides meals to its students and staff. The district may provide meals through the federally funded Child Nutrition Programs, which include the School Breakfast 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 schools receive cash assistance for breakfasts served that comply with program requirements. Districts receive different amounts of reimbursement based on the number of breakfasts served in each of the benefit categories: free, reduced-price, and paid. Texas state law requires schools 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 schools based on the number of meals served within the benefit categories. A district's food service operation may also offer catering services as a way to supplement the food services budget or provide training for students interested in pursuing a career in the food service industry.

The food service operation is dependent on the organizational structure of the district. The two primary models of organizing food service operations are self-management and contracted management. Using the self-management model, a district operates its food service department without assistance from an outside entity. Using a contracted management model, a district contracts with a food service management company (FSMC) 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.

Corrigan-Camden Independent School District (CCISD) participates in the SBP and the NSLP, collectively referred to as the Child Nutrition Programs (CNP). The district also receives donated foods through the United States Department of Agriculture (USDA) Foods Distribution Program. The district uses the contracted management model to organize food service operations. In school year 2015–16, CCISD contracted with Southwest Food Excellence (SFE), an FSMC, to operate the CNP in the district. The Food Services Department consists of the FSMC general manager and 10

food services staff. Nine of the food services staff are employed by the district, and one food services staff is employed by the FSMC. When the district first contracted with the FSMC, it allowed existing food services staff to remain district staff and required all new staff to be FSMC staff. **Figure 6–1** shows the district's reporting structure for the Food Services Department.

The FSMC general manager oversees Food Services Department operations and reports to the superintendent. The FSMC general manager supervises and evaluates the food services staff. The director of curriculum and programs is the district's contact with TDA. According to onsite interviews, the director of curriculum and programs is responsible for submitting the district's claims for reimbursement to TDA, and for processing and verifying free and reduced-price meal applications.

The Food Services Department is funded by federal reimbursement for free meals, reduced-price meals, and full-price meals; state matching funds; local revenue from the sale of meals; a la carte sales; and transfers from the district's general fund. The Food Services Department provides catering services for board meetings, end-of-the-year high school banquets, and beginning-of-the-year breakfast banquets.

CCISD has three campuses, including an elementary school, a junior high school, and a high school. The district has a cafeteria at each campus. All food preparation is onsite. All cafeterias feature self-serve salad bars and use the Offer versus Serve (OVS) serving method. OVS is intended to reduce food waste by enabling students to decline some of the food offered in a reimbursable breakfast or lunch. The FSMC uses a menu planning software, Health-e Meal Planner Pro, to track the nutritional content, cost per meal, and instructions for meal preparation. The district also uses Systems Design, a point-of-sale software (POS) for counting and claiming reimbursable meals. District custodial staff clean the dining rooms. All campuses are closed; however, the district allows parents to bring outside food to their students.

CCISD's Food Services Department operated at a deficit for school year 2016–17, with $561,639 in revenues and $652,291 in expenditures. Expenditures exceeded revenues by $90,652. The district transferred money from the general fund to cover the difference between expenditures and revenues.

FIGURE 6–1
CORRIGAN-CAMDEN ISD FOOD SERVICES DEPARTMENT ORGANIZATION
SCHOOL YEAR 2017–18
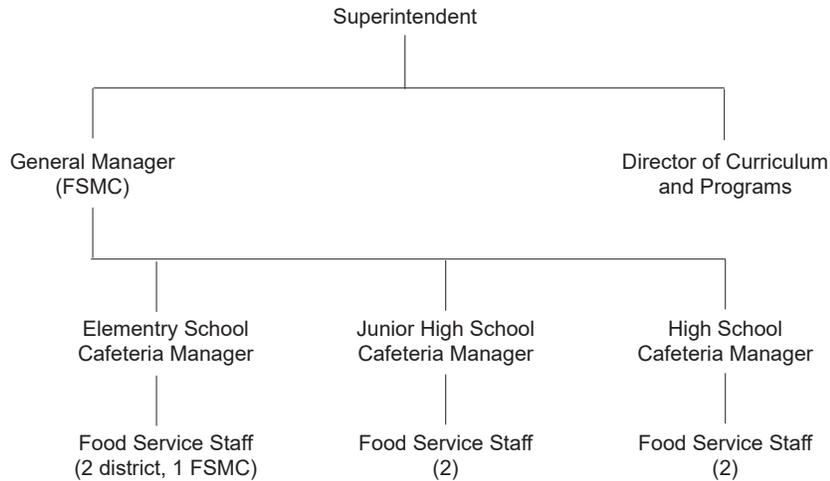
NOTE: FSMC=food service management company.
SOURCES: Legislative Budget Board School Performance Review Team; Corrigan-Camden ISD, September 2017.

During September 2017, the average daily participation (ADP) in the NSLP was 52.9 percent of the 911 enrolled students. The ADP in the SBP during the same month was 56.9 percent. During the same month, 83.9 percent of enrolled students qualified for free and reduced-price meals.

ACCOMPLISHMENT

♦ Corrigan-Camden ISD successfully implemented two alternative meal-service models to improve access to the School Breakfast Program at all grade levels.

FINDINGS

♦ Corrigan-Camden ISD lacks a process to monitor the financial performance of the food service management company.

♦ Corrigan-Camden ISD lacks a process to ensure that the food service management company develops menus and serves meals in compliance with National School Lunch Program meal pattern requirements.

♦ Corrigan-Camden ISD does not ensure that the food service management company promotes maximum participation in the Child Nutrition Programs.

♦ Corrigan-Camden ISD uses procedures for counting meals that do not yield accurate claims of reimbursable breakfasts and lunches served in the cafeterias.

♦ Corrigan-Camden ISD has not properly implemented the Offer versus Serve provision of the federal National School Lunch and School Breakfast Programs in all campuses at all age and grade levels.

♦ Corrigan-Camden ISD does not monitor the food service management company to ensure that food services staff consistently follow standardized recipes and maintain complete and accurate food production records.

♦ Corrigan-Camden ISD implemented an alternative point-of-service collection method without approval from the Texas Department of Agriculture.

RECOMMENDATIONS

♦ **Recommendation 25: Develop financial monitoring tools and reports to improve oversight of the food service management company.**

♦ **Recommendation 26: Designate a district staff to monitor menu planning and meal service to ensure that meals meet program requirements.**

♦ **Recommendation 27: Ensure that the food service management company develops strategies to solicit student feedback and improve menus to increase participation in the Child Nutrition Program.**

♦ **Recommendation 28: Ensure that the food service management company uses counting and claiming processes that provide accurate reports of reimbursable meals in accordance with written procedures and federal regulations.**

♦ **Recommendation 29: Monitor the food service management company to ensure that the food services staff correctly implement Offer versus Serve for breakfast and lunch at all grade levels.**

♦ **Recommendation 30: Develop a process to ensure that food services staff consistently use standardized recipes and record accurate and complete food production records.**

♦ **Recommendation 31: Ensure that the district's policy statement includes all collection methods for counting reimbursable meals.**

DETAILED ACCOMPLISHMENT

BREAKFAST PROGRAM ACCESS

Corrigan-Camden ISD successfully implemented two alternative meal-service models to improve access to the School Breakfast Program at all grade levels.

Alternative service models that move breakfast from the cafeteria and make it a part of the school day often increase breakfast participation. These models overcome timing, convenience, and stigma barriers that inhibit participation in school breakfast. CCISD implemented two alternative service models, Breakfast in the Classroom (BIC) and Breakfast 2.5, to increase SBP participation districtwide.

During school year 2017–18, the district implemented BIC at the CCISD Elementary School campus. The FSMC general manager researched barriers to BIC, developed BIC procedures, and trained staff on BIC implementation. To conduct BIC, food services staff deliver bags of food and class rosters to each classroom. Each classroom receives a cooler containing fruit, juice, and milk and a bag containing a hot or cold breakfast item. Teachers instruct students to take a breakfast item from the bag and juice, fruit, and milk from the cooler. Teachers indicate on the roster which students take a reimbursable breakfast. Although students are required to take each component, they are not required to eat all the components. Students place uneaten items on a table in each classroom. After breakfast is completed, teachers place the rosters in the bags with the leftover breakfasts, and place the bags outside the classrooms along with the trash bags. Food services staff collect the bags and the trash and return the rosters to the cashier in the cafeteria. The cashier enters the ID numbers in the POS system for each student that selected breakfast. In accordance with program regulations, food services staff discard leftover hot food, and staff return unused milk to the serving line.

According to onsite interviews, the implementation of BIC has significantly increased participation in the SBP, and teachers report that BIC procedures do not detract from normal classroom conduct. **Figure 6–2** shows a comparison of September 2016 SBP participation and September 2017 SBP participation at the elementary school.

FIGURE 6–2
COMPARISON OF SCHOOL BREAKFAST PROGRAM PARTICPATION AT CORRIGAN-CAMDEN ELEMENTARY SCHOOL SEPTEMBER 2016 AND SEPTEMBER 2017

DATE	MEALS CLAIMED	SERVING DAYS	AVERAGE MEALS CLAIMED PER DAY	ENROLLMENT	PARTICIPATION
September 2016	6,173	21	294	458	64.2%
September 2017	7,484	19	394	452	87.2%

SOURCE: Texas Unified Nutrition Programs System, 2016–17 National School Lunch Program (NSLP) Site Claim Report and 2017–18 NSLP Site Claim Report .

Figure 6–2 shows that the implementation of BIC increased the number of meals served in September 2017 by 100 meals per day, and it increased participation from 64.2 percent to 87.2 percent.

In addition to BIC, CCISD implemented Breakfast 2.5 at the junior high school and high school. The district serves breakfast to students in the cafeteria from 7:30 a.m. to 8 a.m. During school year 2015–16, the high school cafeteria began serving Breakfast 2.5 from 9:48 a.m. to 10:10 a.m. between second and third periods to offer students who arrive after the first breakfast an opportunity to eat breakfast without being late to class. During Breakfast 2.5, students move through the cafeteria serving line and receive prepacked bags that contain all the components of a reimbursable meal. Students take the bags to class and eat during the beginning of the class period. Due to the program's success, the district implemented Breakfast 2.5 at the junior high school during school year 2016–17. According to onsite interviews, Breakfast 2.5 is popular with the students and has increased participation in the SBP with little to no class disruption. **Figure 6–3** shows a comparison of the numbers of breakfasts served during the 7:30 A.M. breakfast to the number of breakfasts served during Breakfast 2.5 for two days during the onsite review. The district served an additional 169 meals at the junior high and high schools during Breakfast 2.5.

The Food Services Department has improved participation and revenue by implementing BIC and Breakfast 2.5. By implementing this program, the district provides additional funds for program stability and improvements.

DETAILED FINDINGS

FINANCIAL MONITORING (REC. 25)

Corrigan-Camden ISD lacks a process to monitor the financial performance of the food service management company.

CCISD does not effectively monitor the financial performance of the FSMC. Interviews with FSMC and district staff indicate confusion exists as to who receives and monitors financial information for the Food Services Department. The FSMC general manager indicated that the director of curriculum and programs is the district contact for the FSMC. As the district contact, the director of curriculum and programs receives copies of FSMC financial reports that include information regarding net sales, food costs, labor costs, miscellaneous costs, and the net profit and loss statements. However, the director of curriculum and programs indicated that she does not receive information on the financial status of the food services program and is not involved in evaluating the financial performance of the FSMC. The director of curriculum and programs also stated that the FSMC general manager delivers an oral report each month at superintendent cabinet meetings regarding events that occur in the cafeterias; however, these reports do not include financial information. According to the superintendent, the director of curriculum and programs and the business manager are responsible for financial monitoring of the FSMC. However, the business manager indicated that she has very little involvement with food services. She receives the FSMC invoices, but she does not monitor the FSMC contract or financial performance.

By failing to monitor the financial performance of the CNP, CCISD may not have collected payments from the FSMC owed to the district in accordance with a provision in the contract called the FSMC guaranty. According to the terms of the FSMC guaranty, the FSMC caps the amount the district's CNP can lose money each school year. **Figure 6–4** shows the FSMC's contract guaranteed revenue deficits each year.

During school year 2015–16, the district changed from a self-operated CNP and contracted with the FSMC to operate the Food Services Department to limit financial losses that the district incurred during previous years.

FIGURE 6–3
COMPARISON OF MEALS SERVED DURING FIRST BREAKFAST AND BREAKFAST 2.5
SEPTEMBER 2017

CAMPUS	7:30 A.M. BREAKFAST	PERCENTAGE OF TOTAL	BREAKFAST 2.5	PERCENTAGE OF TOTAL	MEALS SERVED
Junior High School	15	15.5%	82	84.5%	97
High School	9	9.4%	87	90.6%	96
Total	24	12.4%	169	87.6%	193

SOURCES: Corrigan-Camden Junior High School, Meal Serving Transactions for September 27, 2017; Corrigan-Camden High School, Meal Serving Transactions for September 26, 2017.

FIGURE 6–4
CORRIGAN-CAMDEN ISD FOOD SERVICE MANAGEMENT COMPANY PROJECTED DEFICITS
SCHOOL YEARS 2015–16 TO 2017–18

YEAR	DEFICIT
2015–16	($52,994)
2016–17	($69,623)
2017–18	($69,623)

SOURCE: Southwest Food Excellence, Original Contract 2015–16, Contract Amendment 2016–17, Contract Amendment 2017–18.

During onsite interviews, district staff indicated that although the Food Services Department is still losing money with FSMC management, the deficits are less than what they were when the district operated the CNP. District staff attributed the department's financial losses to the loss of revenue due to decreasing student enrollment. Enrollment decreased from 966 students in school year 2015–16 to 917 students in school year 2016–17. The Legislative Budget Board School Performance Review Team found no evidence that the district performs analyses to determine if there are operational inefficiencies that contribute to declining revenue and the deficit budget.

According to the terms of the contract, if the FSMC's operation of the district's Food Services Department results in a deficit greater than the projected deficit stated in district's food services budget, the FSMC is required to pay the district a guaranty payment within 30 days.

An analysis of the FSMC year-end financial statements shows deficits greater than the projected losses in the contract. **Figure 6–5** shows the food services program deficits capped in the FSMC contract to the actual deficits for the two completed years of the contract.

Although the FSMC lost more than its projected deficit for the last two contract years, the FSMC has not paid the district the guaranteed payment due. Furthermore, the review team found no evidence that the district evaluated whether the FSMC owed the district money, in accordance with the FSMC guaranty provision of the contract.

Without a process to evaluate the financial statements and performance indicators of the CNP, the district is unable to assess the financial and operational performance of the FSMC. Failure to determine if the FSMC owes the district a guarantee obligation has resulted in a loss of food services funds that the district is entitled to as part of the contract with the FSMC.

In addition, TDA could cite the district for insufficient financial monitoring of the FSMC. To ensure that school districts implement the CNP in accordance with state and federal requirements, TDA conducts Administrative Reviews (AR) of participating school districts. The AR is a standardized review process developed by USDA that includes a comprehensive on-site and off-site evaluation of districts. During an AR, TDA will evaluate whether the district retains overall control of the CNP. Part of this evaluation is to determine if the district retains control of the nonprofit school food services account and overall financial responsibility for the CNP. If TDA finds and documents deficiencies in these areas, TDA could issue the district a corrective action plan that outlines the actions the district should take and documentation the district should provide to demonstrate that all findings are resolved.

According to the Institute of Child Nutrition (ICN), successful financial management of a CNP requires careful review and analysis of financial data. For financial data to be purposeful and useful, it must be understood easily, reliable, relevant, and timely. Understanding and monitoring financial data helps decision makers determine the profitability and efficiency of a CNP and identify areas for improvement.

Districts use several types of analyses to generate performance indicators for evaluating the effective financial management of a CNP. Performance indicators could be stated in dollars, percentages, or ratios to facilitate the analysis process. ICN identified the

FIGURE 6–5
COMPARISON OF CORRIGAN-CAMDEN ISD FOOD SERVICES PROGRAM CAPPED TO ACTUAL DEFICITS
SCHOOL YEARS 2015–16 AND 2016–17

YEAR	CAPPED DEFICIT	ACTUAL DEFICIT	DIFFERENCE
2015–16	($52,994)	($71,849)	$18,855
2016–17	($69,623)	($90,651)	$21,028

SOURCE: Southwest Food Excellence, Original Contract 2015–16, Contract Amendment 2016–17, Year-end Financial Statement 2015–16, Year-end Financial Statement 2016–17.

following performance indicators for "taking the financial pulse" of school food services programs:

- financial position (statement of revenue and expenditures, balance sheet, budget variances, fund balance);

- percentage of cost by category to total revenue (operating ratios);

- meal cost (plate cost, food cost per meal, labor cost per meal, commodity value per meal);

- participation rate (by program and eligibility category); and

- productivity (meals per labor hour, revenue to variable costs).

Corrigan-Camden ISD should develop financial monitoring tools and reports to improve oversight of the FSMC. The superintendent and the business manager should develop a written plan that identifies the tasks that the district should implement to monitor the financial performance of the CNP. At minimum, the plan should require the district to collect and review key financial performance indicators. It also should provide a timeframe for the performance of monitoring tasks to ensure that financial information is reviewed ongoing. The plan should provide steps for the review of the following performance indicators:

- financial position (statement of revenue and expenditures, balance sheet, budget variances, fund balance);

- percentage of cost by category to total revenue (operating ratios);

- meal cost (plate cost, food cost per meal, labor cost per meal, commodity value per meal);

- participation rate (by program and eligibility category); and

- productivity (meals per labor hour, revenue to variable costs).

The plan should identify the monitoring tasks necessary to ensure that the district receives the guarantee payment when applicable. The following tasks could be part of the plan:

- identify district staff to monitor the profit and loss status of the food services operation during the school year to identify any concerns and address them as needed;

- review CCISD's actual end-of-the-year budget report and compare the financial information to the FSMC guaranty of return as stated in the contract to identify if the financial return was achieved; and

- discuss the findings of this review with the FSMC. If the financial return was not met by the FSMC, evaluate whether the district is owed a guarantee payment from the FSMC; and

- document the results of the evaluation and keep on file for review.

The district could implement this recommendation with existing resources. Implementing this recommendation may reduce future potential losses.

MEAL PATTERN REQUIREMENTS (REC. 26)

Corrigan-Camden ISD lacks a process to ensure that the food service management company develops menus and serves meals in compliance with National School Lunch Program meal pattern requirements.

The NSLP provides nutritionally balanced, economically priced, or free lunch to students each day. School districts that participate in the NSLP receive reimbursement from the USDA through TDA for each lunch they serve. In return, school districts must serve lunches that meet the meal pattern requirements. Meal requirements are food-based and specify kinds and amounts of food for the five required lunch food components.

The district's contract with the FSMC states, "The FSMC shall provide meals that meet meal pattern set by USDA." The contract also states that the district "shall monitor the food service operation of FSMC through periodic on-site visits to ensure that the food service is in conformance with USDA program regulations."

According to onsite interviews, the FSMC general manager plans the menus for each campus a month in advance and submits the menus to the FSMC corporate office. The FSMC corporate office performs nutritional analysis and approves the menus for compliance with program regulations. The FSMC general manager does not use cycle menus, and instead plans menus based on meal popularity with the students. The FSMC general manager periodically visits the cafeterias to monitor meal preparation. Food services staff do not receive food preparation training, but the FSMC general manager indicated that she investigates if food services staff deviate from the menus. During onsite interviews, district

staff indicated they are not involved in menu planning and do not monitor meal preparation or service to determine if meals contain the required components to be reimbursable.

Figure 6–6 shows the NSLP's nutrition standards. This meal pattern shows detailed information regarding the minimum requirements for meals served for each age or grade group. Components must meet requirements for daily and weekly servings.

The review team observed meal service for the NSLP at all three CCISD campuses. The elementary school cafeteria has two serving lines. One serving line is for prekindergarten through grade two, and the other serving line is for grades three through five. The lunch menu for the elementary school on September 25, 2017 included chicken nuggets, ravioli with crackers, tater tots, fresh oranges, pineapple, and salad bar. The salad bar self-serve options included baby carrots, broccoli, cauliflower, tomatoes, celery, and spinach, romaine/ iceberg lettuce salad mix. The menu also included fat-free chocolate milk and 1.0 percent unflavored milk.

During the onsite review, the review team observed that the serving sizes of some the components did not comply with meal pattern requirements. The prekindergarten through grade two serving line at the elementary school served one-half cup of ravioli. According to the food production record (FPR) and recipes available at the elementary school, the serving size for the ravioli that yields the required 2.0 ounces of meat or meat alternate is one cup; therefore, a serving size of one-half cup is insufficient.

In addition to serving insufficient meat or meat alternate, both serving lines served an insufficient grain component. The recipe for the ravioli indicated that three packages of crackers are served with the meal. However, the serving line served one package of crackers to students in prekindergarten to grade two and two packages of crackers to students in grades three to five. These serving sizes did not comply with the recipe, however the serving size listed in the recipe itself is also inadequate. According to the product summary, three packages of crackers is 19.5 grams, and the requirement for crackers to equal one grain is 22 grams.

FIGURE 6–6
NUTRITION STANDARDS IN THE NATIONAL SCHOOL LUNCH PROGRAM, MEAL PATTERN CHART OF MINIMUM AMOUNT OF EACH FOOD COMPONENT PER WEEK, (MINIMUM OFFERING PER DAY) SCHOOL YEAR 2017–18

MEAL PATTERN	KINDERGARTEN TO GRADE 5	GRADES 6 TO 8	GRADES 9 TO 12
Fruits (cups) (1)	2.5 (0.5)	2.5 (0.5)	5 (1)
Vegetables (cups) (1)	3.75 (0.75)	3.75 (0.75)	5 (1)
Dark Green	0.5	0.5	0.5
Red/Orange	0.75	0.75	1.25
Beans/Peas (Legumes)	0.5	0.5	0.5
Starchy	0.5	0.5	0.5
Other	0.5	0.5	0.75
Additional Vegetable to Reach Total	1	1	1.25
Grains (ounce equivalent) (1) (2)	8 to 9 (1)	8 to 10 (1)	10 to 12 (2)
Meat or Meat Alternates (ounce equivalent)	8 to 10 (1)	9 to 10 (1)	10 to 12 (2)
Milk (cups)	5 (1)	5 (1)	5 (1)
Calories (kcal)	550 to 650	600 to 700	750 to 850
Saturated Fat (percentage of total calories)	< 10%	< 10%	< 10%
Sodium Target 1 (mg)	≤ 1230	≤ 1360	≤ 1420

NOTE: Numbers in parentheses refer to the minimum offering per day.
SOURCE: Texas Department of Agriculture Administrator's Reference Manual, Lunch, October 1, 2017.

The elementary school served and claimed 129 lunches on September 25, 2017 that did not meet meal pattern requirements. **Figure 6–7** shows the value of the potential overclaim for 129 elementary school lunches offering insufficient grain and meat/meat alternate components.

FIGURE 6–7
POTENTIAL OVERCLAIM FOR LUNCHES OFFERING INSUFFICIENT GRAIN AND MEAT OR MEAT ALTERNATE AT CORRIGAN-CAMDEN ELEMENTARY SCHOOL SEPTEMBER 25, 2017

MEAL	CLAIMED	REIMBURSEMENT (1)	TOTAL CLAIM FOR NONREIMBURSABLE MEALS
Free	106	$3.31	$350.86
Reduced-price	6	$2.91	$17.46
Full price	17	$0.39	$6.63
Total	**129**		**$374.95**

NOTE: (1) Includes additional $0.06 Performance-based Reimbursement (Lunch).
SOURCES: Corrigan-Camden ISD Food Production Record for Elementary School Lunch on September 25, 2017; Claim Rates for National School Lunch Program, July 1, 2017, to June 30, 2018.

During lunch observations at the high school, the lunches served also did not meet meal pattern requirements. The menu for the high school on September 26, 2017, included parmesan chicken with spaghetti and roasted tomatoes, pizza, hot dog, spicy chicken sandwich, hamburger, chicken Cobb salad with a roll, potato tots or wedges, peppered corn, pears, fresh apples, and a self-serve salad bar. The salad bar contained tomatoes, cauliflower, broccoli, carrots, and romaine/iceberg lettuce salad mix. According to product documentation, the roll was 1.25 ounces and the croutons were 0.5 ounces, providing a total 1.75 ounces grain component for the Cobb salad. This amount is less than the 2.0 ounces necessary to meet the requirement for two grains for high school students. Three Cobb salad meals were served.

If CCISD ISD does not review the menus and the meals served to ensure they meet the meal pattern requirements, reimbursement funds may be at risk. During TDA's AR, the reviewer determines if lunches and breakfasts claimed for reimbursement by the district contain food items/components for the appropriate grade group as required by program regulations. Additionally, reviewers must ensure that every reimbursable meal service line meets the daily and weekly meal pattern requirements for the appropriate age/grade group served. TDA reviewers examine the following specific areas:

- menus (day of review and review week);

- food production records;

- standardized recipes; and

- related materials (Child Nutrition labels, food receipts, product analysis).

TDA must disallow or reclaim meals served on the day of the AR that do not meet the minimum meal pattern requirements. TDA may assess an additional overclaim if campus food production records for previously served menus indicate meals were missing required components or offered insufficient portion sizes. An overclaim is the portion of the district's claim for reimbursement that exceeds the federal financial assistance that is properly paid.

The USDA has provided certification worksheets and instructions at usda.gov that districts can use to evaluate whether the planned menu for a week meets the meal pattern requirements. Effective districts use these worksheets to enter menu information and portion sizes to ensure that all meal pattern requirements are met. TDA has provided a food-based planning template for menu portions, which is available at www.squaremeals.org. This document can be found in the forms section and provides a format for districts to follow to ensure that all meal pattern requirements are met.

Corrigan-Camden ISD should designate a district staff to monitor menu planning and meal service to ensure that meals meet program requirements. The district staff should perform the following monitoring tasks:

- meet with the FSMC general manager to review the monthly menu prior to implementation to determine that all meal pattern requirements are being met;

- schedule site visits to the cafeteria and kitchen to evaluate meal service and ensure meals are prepared and served in a manner that conforms to the meal pattern requirements; and

- coordinate with the FSMC general manager to provide ongoing training to all food services staff regarding meal pattern requirements. Each summer and often throughout the year, Regional Education Service Center VI (Region 6) offers free workshops and training classes that cover menu planning and meeting meal pattern requirements. CCISD food services staff should attend these summer workshop classes.

The district could implement this recommendation with existing resources.

MEAL PARTICIPATION (REC. 27)

Corrigan-Camden ISD does not ensure that the food service management company promotes maximum participation in the Child Nutrition Programs.

In 2007, TDA reported that the statewide participation rate in the SBP was 30.0 percent and the statewide participation in the NSLP was 65.0 percent. CCISD's contract with the FSMC requires the FSMC to "promote maximum participation in the Programs." According to onsite interviews, the FSMC general manager monitors the daily profit and loss of each cafeteria to determine which meals are the most popular. The general manager tries to increase participation by adjusting menus to include items that students enjoy. At the time of the review, the FSMC had not conducted taste testing or student surveys. However, the FSMC general manager indicated plans to implement strategies to increase participation during school year 2017–18. The FSMC general manager stated that these strategies include talking with students to get feedback, taste testing new products, and implementing promotions and activities such as Roving Chef, behind the scenes kitchen tours, and Farmer's Market at the Elementary School Fair.

Participation in the NSLP and SBP is lower than the state averages at some of CCISD's campuses. Although participation in the SBP has improved due to the implementation of innovative programs such as breakfast in the classroom and Breakfast 2.5, the district has an opportunity to increase SBP participation at the secondary level. **Figure 6–8** shows the percentage of average daily participation (ADP) of students in the SBP and NSLP compared to the average daily attendance (ADA) of students based on eligibility for free, reduced-price, and full-price meal benefits by campus.

As shown in **Figure 6–8**, 56.9 percent of CCISD students participated in the SBP in September 2017, which is well above the state average of 30.0 percent. The elementary school had the greatest percentage of student participation in the SBP at 87.2 percent, and the high school had the lowest, with 21.9 percent of students participating. Additionally, 52.9 percent of CCISD students participated in the NSLP during this period. The elementary school had the greatest percentage of student participation in the NSLP at 57.5 percent, and the high school had the lowest with 45.2 percent of students participating. The district percentage of participation in the NSLP is less than the state average of 65.0 percent at all three campuses.

FIGURE 6–8
CORRIGAN-CAMDEN ISD BREAKFAST AND LUNCH PARTICIPATION PERCENTAGES BY CATEGORY
SEPTEMBER 2017

BREAKFAST											
	FREE			REDUCED PRICE			FULL PRICE				
CAMPUS	ENROLLMENT	ADP	PERCENTAGE OF ADP	ADA ELIGIBLE	ADP	PERCENTAGE OF ADP	ADA ELIGIBLE	ADP	PERCENTAGE OF ADP	TOTAL ADP PERCENTAGE
High School	156	48	30.8%	34	6	17.6%	80	5	6.3%	21.9%
Junior High School	125	50	40.0%	19	6	31.6%	45	9	20.0%	34.4%
Elementary School	314	279	88.9%	28	25	89.3%	110	90	81.8%	87.2%
Total	**595**	**377**	**63.4%**	**81**	**37**	**45.7%**	**235**	**104**	**44.3%**	**56.9%**

LUNCH											
	FREE			REDUCED PRICE			FULL PRICE				
CAMPUS	ENROLLMENT	ADP	PERCENTAGE OF ADP	ADA ELIGIBLE	ADP	PERCENTAGE OF ADP	ADA ELIGIBLE	ADP	PERCENTAGE OF ADP	TOTAL ADP PERCENTAGE
High School	156	85	54.5%	34	14	41.2%	80	23	28.8%	45.2%
Junior High School	125	75	60.0%	19	11	57.9%	45	14	31.1%	52.9%
Elementary School	314	207	65.9%	28	13	46.4%	110	40	36.4%	57.5%
Total	**595**	**367**	**61.7%**	**81**	**38**	**46.9%**	**235**	**77**	**32.8%**	**52.9%**

NOTE: ADA=average daily attendance; ADP=average daily participation.
SOURCES: Legislative Budget Board School Performance Review Team, September 2017; Corrigan-Camden ISD Elementary School, Junior High School, and High School National School Lunch Program Site Claim Reports, September 2017.

During onsite interviews, the superintendent indicated that participation in the CNP has declined due to declining enrollment. However, decreasing participation may also be due to students' and parents' perceptions of the food taste and quality. The review team observed significant plate waste during meal services. The district does not survey students for food taste and quality and does not involve students in menu planning. During onsite interviews, high school and junior high school students said that the food is bland and expressed a desire for more variety on the menu. Elementary school students said that they opt to bring their lunch from home because they do not like the food served in the cafeteria. Principals indicated that the food quality is better than it was before the FSMC operated the CNP. However, they also stated that many students bring food from home or do not eat, especially at the junior high school and the high school. Food services staff indicated that items are on the menu regardless of whether the students like the item or not, and meal participation could be improved if students could participate in surveys to indicate the food choices they prefer.

A survey conducted by the Legislative Budget Board (LBB) showed that 22.4 percent of parents and 35.2 percent of CCISD staff agreed or strongly agreed with the statement "The cafeteria's food looks and tastes good." Parent survey results indicate that 44.8 percent of parents agreed with the statement "My student regularly purchases a meal from the cafeteria."

If the FSMC does not maximize participation, there is a risk that students are not receiving the nutrition benefits made available through the CNP. According to the national organization Food Research and Action Center, studies conclude that participation in school breakfast is associated with improved math grades, attendance, and punctuality. Students who eat breakfast show improved cognitive function, attention, and memory. Research shows that children who eat breakfast at school, closer to class and test-taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. They found that school breakfast participation is associated with a lower body mass index (an indicator of excess body fat), lower probability of being overweight, and lower probability of obesity. Similarly, the NSLP has continued to grow as an integral part of the local education program. Educator comments, published by the USDA Food and Nutrition Service, further assert

that children who do not eat properly are very hard to discipline. Conversely, students who receive a nutritious lunch have shown a marked improvement in attitude.

In addition, by failing to maximize participation at the campus level, the district forgoes potential revenues from reimbursement claims for eligible students who are not participating. CCISD does not receive the full amount of potential federal and state revenues to support the food services operation.

Best practices dictate that the district remove barriers to student participation in the SBP and NSLP so that students receive the nutritional benefits of the child nutrition programs. To increase meal participation, effective food service departments prepare nutritious food that is appetizing and liked by students. For example, Elgin ISD developed menus that meet the nutritional needs of students and that serve as a marketing tool for the department to attract customers. Elgin ISD daily provides students and teachers with a variety of menu selections that include fresh fruits and healthy choices. The food is prepared and served in a comfortable atmosphere.

Del Valle ISD also increased student participation in its CNP. These efforts included updating menus with new selections and establishing a new food court. The district increased its federal reimbursements and ensured that students received adequate nutrition as accorded by the NSLP and SBP.

Corrigan-Camden ISD should ensure that the FSMC develops strategies to solicit student feedback and improve menus to increase participation in the Child Nutrition Program. To accomplish this increase, the district should coordinate with the FSMC to perform the following tasks:
- track daily participation for each menu to determine if certain menus are more appealing to students than others and make changes as indicated;

- provide information about various promotions and Breakfast 2.5 on the district's website and via brochures and menus provided to students and parents;

- establish a menu planning team that may include students, school wellness team members, and other school staff;

- revise menus based on feedback from surveys conducted of students, parents and staff. The FSMC should modify menus to incorporate favorite foods that the students enjoy to increase the number of students who participate. The FSMC could involve the students in menu planning activities to allow them to feel involved; and

- monitor plate waste and make appropriate menu adjustments as required;

Since the time of the review, district staff indicated that the FSMC general manager conducted taste tests and surveys for all grade levels, and established a menu committee to gain feedback on student preferences.

If the district works with the FSMC to implement some of the strategies identified, it could increase a CNP participation districtwide. **Figure 6–9** shows the projected daily revenue gain if breakfast and lunch ADP at Corrigan-Camden High School were to increase to 55.0 percent.

Figure 6–10 shows the potential daily revenue gain from increasing ADP to 55.0 percent during Corrigan-Camden Junior High School's breakfast.

As **Figure 6–9** shows, the district has an opportunity to increase food services revenue at the high school by $135.74 daily if ADP for breakfast and lunch increased to 55.0 percent. This increase would result in a projected annual revenue gain of more than $23,000 ($135.74 daily increase in revenue x 172 days in a school year) at the high school. **Figure 6–10** shows a potential annual revenue gain of more than $9,800 ($57.05 daily increase in revenue x 172 days in a school year) at the junior high school. This revenue could help offset some of the program's losses.

The fiscal impact for this recommendation assumes any strategies to increase participation could be implemented using existing resources and that CNP participation and revenue would increase. If the district increased lunch participation to 55.0 percent of ADP at the high school, and increased breakfast participation to 55.0 percent of ADP at both the junior high and high schools, total projected annual revenue would increase by approximately $33,000 annually ($23,000 at the high school + $9,800 at the junior high school).

FIGURE 6–9
CORRIGAN-CAMDEN HIGH SCHOOL ACTUAL VERSUS PROJECTED REVENUE FOR BREAKFAST AND LUNCH WHEN AVERAGE DAILY PARTICIPATION (ADP) INCREASES TO 55.0 PERCENT FOR BREAKFAST AND 55.0 PERCENT FOR LUNCH
SEPTEMBER 2017

BREAKFAST						
	ADP AT 21.9% OF ENROLLMENT			PROJECTED 55.0% ADP		
CATEGORY	APPROVED	ADP	REVENUE PER MEAL	TOTAL REVENUE	55.0% ADP	TOTAL REVENUE	INCREASED DAILY REVENUE
Free	156	48	$2.09	$100.32	86	$179.74	$79.42
Reduced Price	34	6	$1.79	$10.74	18	$32.22	$21.48
Full Price	80	5	$0.30	$1.50	44	$13.20	$11.70
Total	**270**	**59**		**$112.56**	**148**	**$225.16**	**$112.60**

LUNCH						
	ADP AT 45.2.% OF ENROLLMENT			PROJECTED 55.0% ADP		
CATEGORY	APPROVED	ADP	REVENUE PER MEAL	TOTAL REVENUE	55.0% ADP	TOTAL REVENUE	INCREASED DAILY REVENUE
Free	156	85	$3.31	$281.35	86	$284.66	$3.35
Reduced Price	34	14	$2.91	$40.74	18	52.38	$11.64
Full Price	80	23	$0.39	$8.97	44	$17.16	$8.19
Total	**270**	**122**		**$331.06**	**148**	**$354.20**	**$23.14**
Total Breakfast and Lunch Revenue				443.62		579.36	
Total Breakfast and Lunch Increased Daily Revenue							**$135.74**

SOURCES: Legislative Budget Board School Performance Review Team, Corrigan-Camden High School National School Lunch Program Site Claim Report, September 2017.

FIGURE 6–10
CORRIGAN-CAMDEN JUNIOR HIGH SCHOOL ACTUAL VERSUS PROJECTED REVENUE FOR BREAKFAST WHEN AVERAGE DAILY PARTICIPATION (ADP) INCREASES TO 55.0 PERCENT FOR BREAKFAST
SEPTEMBER 2017

	BREAKFAST						
	ADP AT 34.4% OF ENROLLMENT				PROJECTED 55.0% ADP		
CATEGORY	APPROVED	ADP	REVENUE PER MEAL	TOTAL REVENUE	55.0% ADP	TOTAL REVENUE	INCREASED DAILY REVENUE
Free	125	50	$2.09	$100.32	69	$144.21	$43.89
Reduced Price	19	6	$1.79	$10.74	10	$17.90	$7.16
Full Price	45	9	$0.30	$1.50	25	$7.50	$6.00
Total	**189**	**65**		**$112.56**	**104**	**$169.61**	**$57.05**

SOURCES: Legislative Budget Board School Performance Review Team, Corrigan-Camden Junior High School National School Lunch Program Site Claim Report, September 2017.

COUNTING PROCEDURES (REC. 28)

Corrigan-Camden ISD uses procedures for counting meals that do not yield accurate claims of reimbursable breakfasts and lunches served in the cafeterias.

According to the TDA Administrator's Reference Manual, effective counting and claiming systems enable a school district to report reimbursable meals served by eligibility category accurately. As part of the application to participate in CNP, TDA requires school districts to describe their counting and claiming systems in the Policy Statement for Free and Reduced-Price Meals, Attachment B: Meal Count/Collection Procedures. For this document, CCISD submitted procedures that describe its meal count and collection procedures as "the cashier is stationed at the end of the serving line, determines if the meal selected is reimbursable, and counts the meal by category."

Although these written procedures describe an accurate method for counting and claiming meals, and were TDA approved, the process for counting and claiming observed during the onsite review does not comply with these written procedures or program regulations.

During the elementary breakfast and lunch observations, the teachers for each prekindergarten class collected the students' ID cards and provided the cards to the cashier. The cashier scanned all of the cards into the POS system before the students entered the serving line. As a result, the cashier was unable to verify that each student selected a reimbursable meal before entering the meal count into the system. This process may have resulted in an inaccurate meal count. During prekindergarten breakfast, the review team observed 45 students with meals in the dining room; however, the recorded meal count was 47, indicating a possible overclaim

of two meals. During onsite interviews, staff indicated that the reason they scan the cards in groups is to help move the students through the line faster. The review team observed a similar counting and claiming process during Breakfast 2.5 at the junior high school. Students entered their ID numbers in the key pad at the beginning of the serving line, received their sack breakfasts, and went to class. Staff indicated that the reason for this process was to speed up the Breakfast 2.5 service so that students could get to class more quickly. However, this process does not comply with the written procedures, which state that the cashier is stationed at the end of the serving line. As a result, the cashier was unable to determine if all the meals received were reimbursable and was unaware that some students did not have the option to take a juice when a serving line ran out before the service ended.

According to state and federal regulations, school districts are required to perform an annual self-evaluation of the NSLP and SBP counting and claiming systems for each campus. This process ensures that each cafeteria's claim is based on the counting system TDA has authorized, and that the counting system yields the actual number of reimbursable free, reduced-price, and paid breakfasts and lunches served for each day of operation. During interviews, the director of curriculum and programs indicated she was planning to conduct the annual monitoring review of CCISD's counting and claiming systems during school year 2017–18, but had not conducted this evaluation at the time of the LBB review.

One of the critical areas of the TDA AR is to assess whether a district's counting and claiming procedures reflect the written procedures in the Policy Statement for Free and Reduced-Price Meals, Attachment B: Meal Count/Collection Procedures. TDA also assesses whether

the number of meals counted and claimed for reimbursement is accurate, and the meals claimed met meal pattern requirements. Fiscal action could result if an AR monitor notes inaccurate meal counting and claiming for the day for the review.

If CCISD does not ensure the FSMC implementation of the counting and claiming procedures meets federal requirements, the district risks overclaims established during the course of an AR conducted by TDA.

Figure 6–11 shows the value of the overclaim for using inaccurate counting and claiming procedures.

The total potential overclaim for the use of inaccurate counting and claiming systems is $355.70 for the meals observed by the review team during onsite fieldwork from September 25 to September 30, 2017.

According to program requirements, school districts must have a system for counting and claiming meals that accurately counts, records, consolidates and reports the number of reimbursable meals claimed by category. The POS must be located at the end of the service line and the cashier determines if each student has selected a reimbursable meal and ensures that the district serves one reimbursable meal to each student during each meal service.

Furthermore, the district's contract with the FSMC requires the "FSMC to implement an accurate point of service count using the counting system provided by the School Food Authority in its application to participate in the School Nutrition Programs and approved by the Texas Department of Agriculture." According to the School Nutrition Association publication Keys to Excellence: Standards of Practice for Nutrition Integrity, it is a best practice for school districts to have a method to collect meal counts at the point of service that is reliable and provides accurate data in a timely manner.

Corrigan-Camden ISD should ensure that the food service management company uses counting and claiming processes that provide accurate reports of reimbursable meals in accordance with written procedures and federal regulations. To accomplish this accuracy, the district should coordinate with the FSMC to perform the following tasks:

- monitor all meal service to ensure that methods used in the POS conform to the approved counting and claiming procedures;

- provide training to all cashiers in the district on the approved counting procedures to ensure cashiers are aware of when to enter a student's meal in the system; train cashiers to enter meals at the end of the serving line and to claim each student when the student has a reimbursable meal and not in a group;

- provide training to elementary teachers and substitutes regarding how to best distribute and handle ID cards for prekindergarten students as they move through the serving line to ensure that each student is counted when she or he has a reimbursable meal at the POS; options include:

  ◦ a teacher or aide providing the card to the cashier as the student reaches the POS;

  ◦ teachers placing student cards on their trays and the cashier retrieving the cards at the POS; and

  ◦ cards or badges are pinned on students' clothes or worn on lanyards so that the cashier can retrieve the student information and enter it at the POS; and

- seek input from junior high school administrators and staff regarding how to best accommodate the students participating in Breakfast 2.5 to process students efficiently through the line and to ensure that the district follows proper counting and claiming procedures.

FIGURE 6–11
VALUE OF OVERCLAIM FOR USING INACCURATE COUNTING AND CLAIMING PROCEDURES
SEPTEMBER 25 TO SEPTEMBER 30, 2017

DATE	MEAL SERVICE	CLAIMED	TOTAL CLAIM FOR NONREIMBURSABLE MEALS
September 25, 2017	Prekindergarten lunch	44	$124.80
September 27, 2017	Junior high school breakfast 2.5	82	$157.74
September 28, 2017	Prekindergarten breakfast	47	$73.16
Total			**$355.70**

SOURCES: Corrigan-Camden Elementary School, meal-serving transactions for September 25, 2017, for prekindergarten lunch, and for September 28, 2017, for prekindergarten breakfast; claim rates for National School Lunch Program, July 1, 2017, to June 30, 2018.

The district could implement this recommendation with existing resources.

OFFER VERSUS SERVE (REC. 29)

Corrigan-Camden ISD has not properly implemented the Offer versus Serve (OVS) provision of the federal National School Lunch and School Breakfast Programs in all campuses at all age and grade levels.

According to the FSMC general manager, CCISD has implemented OVS at all grade levels with the exception of prekindergarten students and grades kindergarten through five students who receive breakfast in the classroom. OVS is a serving method intended for students to choose foods they want and reduce food waste without jeopardizing the nutritional integrity of the meals served. OVS enables students to refuse some of the food offered in a reimbursable lunch or breakfast.

For the purposes of OVS at breakfast, a cafeteria must offer at least four food items from the three required food components, which are fruit, grains, and milk. A student must select three food items, including at least one-half cup of fruit to have a reimbursable breakfast. A student could refuse one of the breakfast items (except one half-cup of fruit) and still have selected a reimbursable meal. For OVS at lunch, a cafeteria must offer food items from the five food components, which are meat or meat alternates, grain, fruits, vegetables, and milk. A student must select three of the five offered components. One of the choices selected must be at least a one-half-cup serving of a fruit or vegetable item or a one-half-cup total serving of both fruit and vegetable. Meals with less than one-half cup of fruits or vegetables are not reimbursable. For both breakfast and lunch, if a student is required to select all components, the cafeteria is not implementing OVS.

During the onsite review, the review team observed that food services staff did not ensure that students selected enough fruit and vegetables for their meals to qualify for reimbursement in accordance with OVS. For example, at the elementary school lunch, students selected three or four carrots from the self-serve salad bar; however, students needed to select six carrots to equal one-half cup of vegetables. Similarly, none of the students who selected salad mix took enough salad to equal one-half cup portions.

At both junior high school and high school breakfast services, the review team observed students selecting incomplete meals that were missing fruit. At the junior high school lunch, students who selected items from the salad bar did not get enough to meet the one-half cup requirement. The review team observed six incomplete meals as a result. In addition, the district claimed several students who did not have a fruit or vegetable on their tray.

In addition to claiming meals that did not contain enough of the required components, cashiers required students to take additional food even if they already had a reimbursable meal. For example, at the elementary school, cashiers were observed directing students to take more fruit or vegetable, when their meal containing milk, ravioli, and tater tots comprised all the required components.

According to CCISD's contract with the FSMC, the school district is "responsible for the conduct of the Food Services Department and shall supervise the food service operations in such manner as will ensure compliance with all applicable statutes, regulations, rules and policies including regulations, rules, and policies of TDA and USDA." Therefore, CCISD is responsible for monitoring the FSMC to ensure the FSMC implements OVS in accordance with program regulations. However, during the onsite review, the review team found no evidence that any district staff conduct any activities to monitor program compliance.

Corrigan-Camden ISD should monitor the food service management company to ensure that the food services staff correctly implement Offer versus Serve for breakfast and lunch at all grade levels. To implement this recommendation, the superintendent should designate district staff to:

- visit the cafeterias weekly or monthly to review the OVS process and ensure that program requirements are met;

- observe POS counts on each cafeteria line to ensure that students are not required to take unnecessary components that they do not intend to eat;

- coordinate with the FSMC general manager to ensure that food is arranged on the serving line in a manner that makes it convenient for students to refuse food items. For example, menu items that are less likely to be consumed can be individually plated, rather than served on the tray;

- consider preplating salad bar items in serving containers for the prekindergarten to grade two age groups to ensure proper portion sizes are selected;

- educate students on what is included in school meals so that they know how to select a reimbursable meal;

- verify that signage and menus provide clear information about allowable choices. This information would help students easily build a reimbursable meal and reduce problems at the point of service, such as students forgetting a required food item and having to go back and get it, which often slows down the serving line; and

- train all staff who serve and count reimbursable meals to recognize a reimbursable meal in accordance with the requirements of OVS. Throughout the year, Region 6 offers a variety of workshops and training classes that explain OVS and meeting meal pattern requirements. CCISD could take advantage of these classes by contacting Region 6 or checking TDA's website for summer workshop schedules.

Since the time of the review, the district indicated that cafeteria staff have placed signage on all salad bars to assist students select the full amount of required fruit and vegetable components for a reimbursable meal.

The district could implement this recommendation with existing resources.

FOOD PRODUCTION RECORDS (REC. 30)

Corrigan-Camden ISD does not monitor the food service management company to ensure that food services staff consistently follow standardized recipes and maintain complete and accurate food production records.

Food service records are necessary to support that the meals served and claimed for reimbursement meet meal pattern requirements. These records include standardized recipes and food production records (FPR).

During onsite interviews, food services staff indicated they use standardized recipes daily. Staff print recipes based on the number of students planned for the day. Although staff have access to the recipes, the review team noted that staff did not always follow the standardized recipes. During observations at the elementary school, food services staff did not follow the portion size information in the recipe for the ravioli. According to the recipe, the serving size for ravioli was one cup; however, the prekindergarten to grade two serving line served one-half cup portions of ravioli.

To record FPRs, food services staff indicated that they access FPRs online, print a hard copy, and document the meals based on the amount prepared. This process requires staff to handwrite the actual amounts prepared next to the printed amounts shown

on the FPR. According to interviews, documenting the amount prepared is time consuming. Cafeteria managers stated that the FSMC initially trained them on the FPRs when the FSMC first came to the district, but they would like additional training. At the time of the onsite review, the FSMC general manager indicated that they would provide training on FPRs in the future.

CCISD does not regularly request documentation from the FSMC to show that the FSMC maintains food production records and standardized recipes. The review team found that the district's FPRs contained inconsistent documentation. **Figure 6–12** shows inconsistencies noted during a review of the district's FPRs.

Food production records are the district's primary supporting documentation to demonstrate that the meals served and claimed for reimbursement met meal pattern requirements and are eligible for reimbursement. If CCISD does not properly maintain supporting documentation to show that the meals served and claimed comply with meal pattern requirements, reimbursement funds and the nutritional integrity of the Food Services Department could be at risk.

During TDA's AR, the reviewer may analyze weekly and monthly menus, production records, recipes, food receipts, child nutrition labels, and product formulation statements to determine whether meals contained the required components, and whether the components were in the right quantities. If a cafeteria's production records indicate that meals contained insufficient or missing components, or if the records lack enough information to determine compliance, TDA could determine that breakfasts and lunches claimed for reimbursement did not adhere to meal pattern requirements. Such a determination could result in a loss of reimbursement funds to the district; TDA could potentially take fiscal action based on the severity and longevity of the identified finding.

Corrigan-Camden ISD should develop a process to ensure that food services staff consistently use standardized recipes and record accurate and complete food production records. To accomplish this accuracy, the district should coordinate with the FSMC and take the following steps:

- ensure that staff use standardized recipes for every meal during the preparation process. If the staff need to adjust a recipe, the FSMC general manager should review to ensure the meal contribution would not be altered and the staff should record changes to maintain consistency. Serving staff should refer to the recipe before meal service to ensure they serve the proper portion sizes;

FIGURE 6–12
CORRIGAN-CAMDEN ISD FOOD PRODUCTION RECORD INCONSISTENCIES
SEPTEMBER 2017

MENU ITEM	DOCUMENTATION INCONSISTENCIES
Chicken Parmesan	Documentation for meals prepared was incomplete, containing the number served and leftover documented. Staff did not document the actual amount prepared for each meal component.
Cobb Salad	Documentation for meal components identified as part of the salad was incomplete. Staff did not document the actual amount prepared for each meal component.
Southwest Chicken Salad w/Crackers	Documentation for components identified as part of the salad was incomplete, containing the number served and leftover documented. Staff did not document the actual amount prepared for each meal component.
Chicken Nachos	Staff did not document the number served and the leftovers.
Crispy Beef Tacos w/Spanish Rice	Documentation showed inconsistency between what the staff recorded as prepared and what actually was served. The FPR shows that three ounces of cheese were prepared; however, 15 ounces were prepared for six servings of beef tacos.
Meatball Sub	Staff did not document the actual amount prepared for each meal component.
Spicy Chicken Sandwich	Staff did not document the number served and leftovers.
Chicken Caesar Salad	Staff did not document the number served and leftovers.
Grilled Cheese Sandwich	Staff did not document the actual amount prepared for each meal component.

SOURCES: Legislative Budget Board School Performance Review Team, September 2017; Corrigan-Camden ISD Daily Food Production Records for the week of September 18 to September 22 and the week of September 25 to September 30 for elementary, junior high, and high school campuses.

- use a production worksheet to document what each food services staff prepared and the amount produced. The cafeteria managers can use the information from the production worksheets to document the FPR. This documentation could alleviate confusion and make the manager responsible for accurate FPRs;

- on the day of production, staff should record the number of meals planned and the amount of food prepared in purchase units (i.e. pounds of ground beef, cans of peaches, or one case at 96 servings). At the end of the day, the staff should record the amount of each food left over on the FPR. The FSMC general manager should then routinely monitor completed food production records to ensure that staff record all required information daily;

- ensure that FSMC general manager trains staff on the importance of recording all foods on the FPR including how to record food contributions and other required information. The FSMC general manager could periodically train staff at each campus to ensure that the district maintains proper documentation and the staff serves menu items correctly according to their recipes and food production records; and

- attend Region 6 training. Each summer and often throughout the year, Region 6 offers a variety of free workshops and training classes that cover food production records, standardized recipes, and other required documents. CCISD could take advantage of these classes by contacting Region 6 or checking TDA's website for summer workshop schedules.

The district could implement this recommendation with existing resources.

POINT-OF-SERVICE COLLECTION PROCEDURES (REC. 31)

Corrigan-Camden ISD implemented an alternative point-of-service collection method without approval from the Texas Department of Agriculture.

During school year 2016–17, the district decided to establish Breakfast in the Classroom (BIC) at the elementary school beginning in school year 2017–18. Before the start of the school year, the FSMC general manager developed procedures to implement BIC that included procedures for teachers to count and claim breakfasts served in their classrooms. Although the FSMC general manager wrote BIC procedures and trained teachers on their implementation, CCISD did not get the procedures approved by TDA in accordance with TDA's application process to participate in the CNP.

The curriculum and programs director submitted CCISD's application to TDA, including the required Policy Statement for Free and Reduced-Price Meals, Attachment B: Meal Count/Collection Procedures, Attachment B: Meal Count/Collection Procedures, on July 14, 2017. Although the district planned to implement BIC during school year 2017–18, the Attachment B did not include a description of the collection procedures for BIC. CCISD's Attachment B states that "breakfasts for all schools are served in the cafeterias and the count is taken by the cashier stationed at the end of the line using a coded card at the POS for kindergarten through grade 5, and a keypad system for grade 6 through grade 12." This description is inaccurate for kindergarten to grade two, because CCISD serves breakfasts for these students in the classroom, not the cafeteria. In addition, this description does not accurately describe the POS collection procedure for meals served in the classroom, because cashiers do not take counts at the end of a serving line using coded cards; rather, teachers count the breakfasts by marking student rosters.

At the time of the onsite review, the district had not submitted a revised Attachment B to reflect these new procedures. According to the contract with the FSMC, CCISD is required to "retain signature authority for the application/contract, fee and reduced price policy statement." The contract also requires the FSMC to implement an accurate point of service count using the counting system provided by the district in its application to participate in the School Nutrition Programs and approved by TDA.

If the district does not secure approval from TDA for its BIC counting and claiming procedures, reimbursement funds could be at risk. During the TDA's AR, the counting and claiming system in use for claiming meals for the SBP and NSLP will be evaluated to ensure that accurate counts by category are determined and that reimbursable meals are correctly counted, consolidated, and recorded at each school. Meals claimed using an inaccurate procedure for counting and claiming may be subject to technical assistance or corrective action, which could include fiscal action based on the findings of the AR.

Corrigan-Camden ISD should ensure that the district's policy statement includes all collection methods for counting reimbursable meals. To implement this

recommendation, the director of curriculum and programs should perform the following tasks:

- describe the counting and claiming system used for BIC in the Policy Statement for Free and Reduced-Price Meals, Attachment B: Meal Count/Collection Procedure and submit to TDA for approval; and

- visit classrooms regularly during breakfast service to ensure that food services staff and teachers implement the approved procedures as written.

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 should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 6. FOOD SERVICES							
25. Develop financial monitoring tools and reports to improve oversight of the food service management company.	$0	$0	$0	$0	$0	$0	$0
26. Designate a district staff to monitor menu planning and meal service to ensure that meals meet program requirements.	$0	$0	$0	$0	$0	$0	$0
27. Ensure that the food service management company develops strategies to solicit student feedback and improve menus to increase participation in the Child Nutrition Program.	$33,000	$33,000	$33,000	$33,000	$33,000	$165,000	$0
28. Ensure that the food service management company uses counting and claiming processes that provide accurate reports of reimbursable meals in accordance with written procedures and federal regulations.	$0	$0	$0	$0	$0	$0	$0
29. Monitor the food service management company to ensure that the food services staff correctly implement Offer versus Serve for breakfast and lunch at all grade levels	$0	$0	$0	$0	$0	$0	$0
30. Develop a process to ensure that food services staff consistently use standardized recipes and record accurate and complete food production records.	$0	$0	$0	$0	$0	$0	$0
31. Ensure that the district's policy statement includes all collection methods for counting reimbursable meals.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$33,000**	**$33,000**	**$33,000**	**$33,000**	**$33,000**	**$165,000**	**$0**

CHAPTER 7. TECHNOLOGY MANAGEMENT

An independent school district's technology management affects the operational, instructional, and financial functions of a school district. 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, while 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 (PEIMS) 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.

Corrigan-Camden Independent School District's (CCISD) Technology Department manages the district's technology support function, which includes the network administrator, technician, and the high school library aide. The library aides at the other campuses check out technology equipment to teachers, but that is the extent of their involvement in technology management. The district does not have an instructional technologist position, but some teachers in the district are trained on technology hardware and software and share what they learn with their colleagues.

Figure 7–1 shows the organization of the CCISD Technology Department.

ACCOMPLISHMENTS

♦ CCISD has developed innovative programs to fulfill the district's technological needs while working within a limited budget.

♦ CCISD has successfully applied available and relevant technology when facing challenging circumstances.

FIGURE 7–1
CORRIGAN-CAMDEN ISD TECHNOLOGY DEPARTMENT ORGANIZATION
SCHOOL YEAR 2017–18
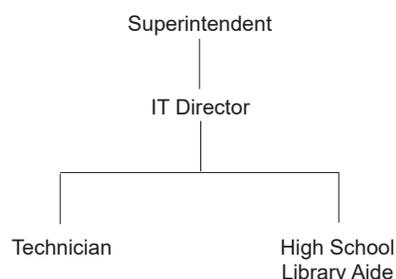
Sources: Legislative Budget Board School Performance Review Team, Corrigan-Camden ISD, September 2017.

FINDINGS

♦ CCISD's Technology Department lacks effective oversight and clearly defined roles for staff.

♦ CCISD lacks written procedures and a coherent process for planning and budgeting for technology.

♦ CCISD does not have an effective work order system for the Technology Department.

♦ CCISD does not have a consistent approach to technology professional development.

♦ CCISD lacks a consistent and effective process for technology inventory management, security of technology items and network infrastructure, and fire safety.

RECOMMENDATIONS

♦ **Recommendation 32: Eliminate the network administrator position and develop a technology director position.**

♦ **Recommendation 33: Develop written procedures and plans for all technology functions, develop a new five-year technology plan, and ensure that all technology items are budgeted for and through the Technology Department.**

♦ **Recommendation 34: Develop a work order system that includes prioritization of technology requests, documentation of work completed, and periodic analysis of trends.**

♦ **Recommendation 35: Provide consistent staff development for the Technology Department and for all district staff.**

♦ **Recommendation 36: Develop and implement processes for inventory management, security of technology items and network infrastructure, and fire safety.**

DETAILED ACCOMPLISHMENTS

INNOVATIVE LOW-COST APPROACHES

CCISD has developed innovative programs to fulfill the district's technological needs while working within a limited budget.

CCISD has collaborated with a nearby state prison to obtain computer hardware at no cost to the district. The prison receives computer components through tax-deductible donations from area businesses. Inmates process the donated components, and assemble and test ready-to-use computers based on the request orders submitted by the CCISD Technology Department. This process is not a universally applicable substitute for purchasing new computers, because the donated technology is somewhat outdated (by corporate standards). However, the program works for the district as large-quantity, noncritical technology infrastructure, including computer labs and student classroom computers. CCISD effectively recognizes where this program is applicable and appropriate, and where the district needs to make new purchases.

Another innovative and cost-saving program is the technology club. This elective class is available to students via an application process. The class offers students hands-on, real-world experience in the technology field by having them shadow members of the Technology Department as they perform their daily duties. This assistance lightens the workload of the Technology Department, thus saving money. It functions similarly to a work-study program except that students do not leave the campus.

Both of these programs have brought value while incurring little cost to the district.

INNOVATIVE USE OF TECHNOLOGY

CCISD has successfully applied available and relevant technology when facing challenging circumstances.

For example, the district's agriculture building was no longer available as an instructional space after it burned. One of the primary educational activities performed in this building was welding instruction. Typical welding instruction requires highly specialized facilities, so the district could not move these classes to another classroom. Rather than delay instruction until new facilities could be constructed, the district purchased three computerized welding simulators, which can be set up and operated in any room. This purchase enabled education to continue uninterrupted, and will save the district money in the long term, as digital instruction does not require the same consumables that physical welding uses.

Another challenge that the district faces is limited availability of home Internet access in the area. In the area surrounding the district, providing physical lines to each home is often not economically feasible for Internet service providers. CCISD developed a program whereby households can check out wireless Internet hubs (Verizon mobile wireless routers) as a substitute for wired Internet access. The district worked directly with the Verizon telecommunications company to ensure that all contracts existed directly between Verizon and the district, thus removing the usual requirement of long-term service agreements, which can be a barrier for many households.

DETAILED FINDINGS

TECHNOLOGY ROLES (REC. 32)

CCISD's Technology Department lacks effective oversight and clearly defined roles for staff.

CCISD's Technology Department consists of a network administrator, technician, and high school library aide. However, according to the job descriptions, no one in the department oversees the technology management of the district. During the Legislative Budget Board's School Performance Review Team's onsite interviews, the superintendent stated that the network administrator directs the Technology Department and reports to the superintendent. However, despite the fact that the Technology Department was mentioned in interviews with several CCISD staff, the Technology Department was not listed in the district organizational chart provided to the school review team.

The network administrator assumes a leadership role within the department; however, his title and responsibilities do not include the overall management of the Technology Department. His job description includes installation, maintenance, and repair of technological equipment throughout the district. It does not include management functions that normally would be assigned to a director or responsibilities related to instructional technology. During onsite interviews, the network administrator stated that he reports to the superintendent, but he also consults with the high school principal. The high school principal formerly led the Technology Department; the principal also is related to the network administrator.

The high school library aide maintains the work order system for the Technology Department. She is unsure to whom she reports. Her job description states that she reports to the network administrator for technology matters and to the high school principal for the library-related job tasks.

The technician's responsibilities are similar to those of the network administrator. These duties include installation, maintenance, and repair of technological equipment throughout the district. During onsite interviews, the technician indicated that he reports to the network administrator and to the high school library aide. However, his job description states that he reports to the network administrator and the high school principal.

The technician reported that he prepares a yearly self-evaluation, and that the network administrator conducts his evaluation. However, the high school library aide does not prepare a self-evaluation and does not receive an evaluation from the network administrator. Instead, her evaluation is conducted by the high school principal.

Because no position is responsible for the overall management and oversight of the department, administrative tasks either are not conducted efficiently or are not conducted. Responsibilities such as budgeting, planning, and other tasks are not effectively accomplished by CCISD's Technology Department, and none of these responsibilities are listed in the network administrator's job description. The network administrator was not certain whether he was responsible for management functions. In addition, the department's unclear lines of communication and reporting relationships could result in confusion and inefficient handling of many important technology-related decisions.

The district should eliminate the network administrator position and develop a technology director position.

The district should develop a new job description for the technology director. This job description should emphasize management tasks such as budgeting, planning, and staff supervision, and de-emphasize the tasks related to physical installation and repair of hardware, which should be the primary role of the technician. The high school library aide and technician should report to and be evaluated yearly by the technology director. The district should add the technology director to the organization chart, and the position should report to the superintendent.

Eliminating the network administrator position would save the district $64,932 ($54,110 salary + 20.0 percent of salary for benefits). Developing a technology director position would cost the district $71,838 (market salary average of $59,865 + 20.0 percent of salary for benefits). The total cost to the district would be $6,906 ($71,838-$64,932).

Since the time of the review, the district states that the high school principal has be reassigned to the role she previously held, instructional technology director, and she will be overseeing the Technology Department as part of her job duties.

PROCEDURES, PLANNING, AND BUDGETING (REC. 33)

CCISD lacks written procedures and a coherent process for planning and budgeting for technology.

The district lacks proper documentation of procedures for technology functions. During the review team's onsite interviews, technology staff indicated that the network administrator is training the technician to do the technical tasks, including setting up hardware and software, repairs, and network maintenance. However, if the network administrator were to leave or have a prolonged absence, much of his knowledge would be lost or unavailable to the district.

The network administrator led the development of the district's technology plan that spanned three school years: 2014–15, 2015–16, and 2016–17. The technology plan includes goals, objectives, and strategies and budget amounts for each objective. The plan also includes an overall budget for each year of the plan and potential E-rate funding. However, at the time of the onsite review, CCISD did not have a technology plan for school year 2017–18 or any subsequent school years. The network administrator stated that he was working on a plan. Without a long-term technology plan, with specific goals, objectives, strategies, and budget, the district will have difficulty planning and

implementing its vision and execution of usable technology throughout the district.

In addition, the Technology Department does not have a documented disaster recovery plan. The network administrator consistently performs local and off-site backups of all local files and software configurations. Much of the other software and data is backed up at Regional Education Service Center VI (Region 6). However, no written disaster recovery plan is available to cover various types of disasters and prescribe how the district would respond to them. The network administrator says he has plans in mind, but he has not documented them.

The district has an acceptable use policy that every student and parent must sign to be able to use technology in the district. However, the district does not have an acceptable use policy for staff. Without a staff acceptable use policy, staff cannot be certain regarding the expectation that the district has regarding the proper use of technology.

The district also lacks a network map. A network map is a diagram that shows the network setup throughout the district, including hardware locations and connections and software locations and dependencies. The district provided the review team with a network map document. However, this map only showed the Wi-Fi access points on each school campus and did not show how the entire CCISD network is set up. Only the network administrator has a full knowledge of all the hardware and network connections in the district. Without a network map, if the network administrator were to leave, it would be challenging for his replacement to ascertain how the district's network is set up. Network maps also are used to facilitate and expedite every interaction with outside vendors, consultants, and service-providers.

The Technology Department does not conduct a life-cycle analysis or planned replacement cycle for assets. The district purchased desktop computers for all teachers. The district used its general fund to purchase those computers for school year 2017–18, instead of budgeting for the purchase for a specific year. At the end of a recent budget year, the network administrator purchased several large-size monitors with leftover funds. He did not consult with teachers to determine if they could use those items effectively. Some of these monitors have a limited use in the district, and others are not being used at all.

The district makes many technology purchases without involving the Technology Department. The district uses an internal technology grant program modeled from Diboll

ISD, where the district sets aside funds and teachers apply for technology items they want to use in their classrooms. Teachers submit applications to the superintendent, who distributes them to the campus principals for review and approval. Although this program has increased teacher use and buy-in for utilizing technology, it does not enable the Technology Department to budget or track these items effectively. The purchase and tracking of these items is conducted outside of the Technology Department's purview.

Effective districts have written procedures for all functions, plan for all technology needs, and consult with stakeholders throughout the district to determine the district's technology needs.

The district should develop written procedures and plans for all technology functions, develop a new five-year technology plan, and ensure that all technology items are budgeted for and through the Technology Department.

The network administrator, technician, and high school library aide should list all functions that they perform in the district and record how to accomplish each function. The network administrator should review the information prepared by the technician and the high school library aide. The technician and the high school library aide jointly should review the information prepared by the network administrator. The network administrator should compile all of the information into a Technology Department operating manual. This manual should be revisited annually and updated or revised as needed.

The network administrator should lead a technology committee that includes the superintendent, business manager, principals, teachers, and other stakeholders to develop a technology plan. The committee should start by examining the previous plan and assessing the items that were accomplished, which still need to be accomplished, which need to be edited, and which should be removed. The committee should add other items that the district needs and link budget amounts to those items. The technology committee should conduct a life-cycle analysis and budget for computers and other items that the district will need to replace. The district should ensure that all technology purchases are made through the Technology Department.

The network administrator should develop a disaster recovery plan and develop a network map so that these are properly documented and accessible. The Technology Department also should have all staff sign an employee acceptable use policy, using the student and parent policy as a template.

The district could implement this recommendation with existing resources.

WORK ORDERS (REC. 34)

CCISD does not have an effective work order system for the Technology Department.

In previous school years, there was no formal process for staff to notify the Technology Department of technology-related issues. Staff typically called the Technology Department for assistance, or, upon seeing Technology Department staff, would ask them to help with an issue. For school year 2017–18, the district implemented a new process requiring staff to e-mail the high school library aide in order to notify the Technology Department of hardware or software issues. The district has no specific form for these issues, so staff describe the issues they are having within the e-mail. The high school library aide then compiles these requests and records them on a white board each morning. The network administrator and technician divide these tasks, typically by campus location, and go to the campuses to resolve the issues. If the high school library aide is absent, the e-mailed requests are not identified and recorded. The department does not have a process to log when an order has been completed. Staff do not save or log the work orders.

The superintendent said that she directed the network administrator to develop a work order system for the Technology Department that would include prioritization of jobs, documentation of work completed, and analysis of trends. However, interviews with Technology Department staff indicated that none of those three things is part of the work order process. For example, CCISD does not have a systematic method for prioritizing work orders so that those directly affecting instruction are completed first. During onsite interviews, teachers indicated that work orders seem to be processed on a "first come, first serve" basis, no matter the severity of the issue. Additionally, no system is in place to track the number of work orders and to determine any recurring technology issues throughout the district.

CCISD also lacks a process for documenting the number of work orders received and completed. The Technology Department does not use any metrics to measure the time it takes for a ticket to be completed, and users are not asked to rate the quality of service after a help desk ticket is closed. The department does not have a process to ensure that tickets are resolved quickly or that staff are aware of a timeline for completion of their work orders. The district has no analysis of trends in these work orders because no data is available to determine trends.

Keller ISD has established metrics to ensure that its help desk is responding effectively to help desk tickets. The district has also set specific goals for these metrics to monitor them. The metrics include the following:
- 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.

The district should develop a work order system that includes prioritization of technology requests, documentation of work completed, and periodic analysis of trends.

The network administrator should investigate potential electronic systems to manage technology work orders, and ask other school districts what systems they use. The district could choose to purchase a system for this purpose, or it could use spreadsheets and databases in existing software to develop this system. The system should include the following components:
- a three-level system wherein staff can prioritize jobs as low, medium, or high priority;
- a login process wherein staff can follow the status of their work orders; and
- a satisfaction rating by the originator of the work order.

Periodically, the network administrator should analyze this data to recognize trends and determine how best to serve the district. These trends should at least include the following metrics:
- the average time to initially respond to a work order;
- the average time to close a ticket; and
- the number of work orders completed by each technology staff.

If the district chooses to purchase software, it should consult with other departments to see if multiple departments could use the software and share the cost.

If the district chooses to use free or existing software, the district could implement this recommendation with existing resources.

STAFF DEVELOPMENT (REC. 35)

CCISD does not have a consistent approach to technology professional development.

In June 2017, the Technology Department staff attended the International Society for Technology in Education Conference. At the time of the review, the Technology Department did not have any plans for training or professional development. The department has no training calendar or training budget. It also has no overall plan for staff development. The department does not conduct staff training during the week before the start of the school year nor during early release days.

During onsite interviews, some CCISD staff indicated that they received training from the network administrator regarding new district technology. However, the district does not provide this training consistently. The district has no training segment on technology during the week before classes begin.

Other teachers indicated that if they have an interest in a specific technology, the district often is willing to send them to events or conferences to receive training on that technology. The district then expects that teacher to train other staff that did not attend on how to use the software or hardware. The only consistent technology training that CCISD staff receives is what is included in the EduHero online trainings that staff must complete each year. EduHero provides online trainings to staff in Texas school districts on topics such as bloodborne pathogens and child abuse awareness.

Without professional development, the district will not be able to improve the integration of technology into the classroom. Because technology applications and resources change often, effective technology integration requires continuing development and training for educators. Without full technology integration, the district is limiting the students' ability to achieve and prepare for the world outside of school.

High-performing school districts' technology departments include a professional development and training plan for staff to remain updated regarding new technology and to continue striving to master existing technology. A professional development and training plan typically consists of clear guidelines for areas of improvement, including goals, rationales, activities, milestones, resources, and a statement of consequences for no evidence of growth.

The district should provide consistent staff development for the Technology Department and for all district staff.

The district should mandate training each year during the week before school starts. At this training, the network administrator can review software and hardware functions and introduce new software and hardware to staff. The district also periodically could use an early release day to offer technology training to staff.

The network administrator should assess the technology staff's skill sets against the district's support needs and develop professional development and training plans to address deficiencies. The administrator should develop a training calendar before the beginning of the school year with a plan of the trainings to conduct. He should also investigate trainings available outside of the district to plan further training for Technology Department staff. The district should determine a technology training budget each year.

The district could implement this recommendation with existing resources.

If the district chooses to attend trainings outside the district, these trainings could have an added cost.

INVENTORY MANAGEMENT, SECURITY, AND FIRE SAFETY (REC. 36)

CCISD lacks a consistent and effective process for technology inventory management, security of technology items and network infrastructure, and fire safety.

The district does not consistently tag technology assets. The Technology Department does not tag any of the refurbished computers that the district receives from the prison system. The network administrator stated that the district did not tag these computers because they are not high-value items. In addition, at the time of the review, the Technology Department had not tagged the new desktop computers the teachers received. The network administrator said that he intended to tag these assets, but had not completed this task. Technology items that the district receives outside of the Technology Department also are not tagged, including graphing calculators and some tablet computers. Other items that the school review team observed that were not tagged included some television sets, printers, and overhead projectors.

When the Technology Department does tag technology items, the network administrator tags them. Then, the high school library aide logs most items into an inventory database called Library Resource Management Systems (LRMS). The high school aide acknowledged that many of the listings in this system are outdated and may include technology that is no longer in use or no longer in the district. The district has no procedure for regular cleaning or maintenance of this database. In addition, staff do not know how to produce a report from this database. Staff explained that they needed to contact the developer of the software to be able to generate reports. The Technology Department does not maintain its technology assets in the inventory module of the TxEIS system, which the district already accesses and uses for other functions.

In addition to this main inventory database, the Technology Department also uses separate inventories for other technology items. The department has a telephone inventory for all phones in the district. This inventory does not include location, cost, or purchase date of the phones. Another inventory list is of all hardware that the district owns that is capable of wireless networking. This list does not include cost or purchase dates.

On each campus, the library aide is responsible for checking out tablet computers to students and teachers. Students can check out individual tablets, and teachers can check out carts of tablets. Each library aide tags and inventories the tablets that they receive. Although the process is similar on the various campuses, library aides do not follow a set process to tag, inventory, and check out tablets.

For example, the high school library aide maintains an inventory of tablets that she checks out to students and teachers. The inventory does not include model name and number, cost, or purchase date. It only includes checked out tablets. The school review team did not receive inventory lists from the other library aides, so there could be differences in what their lists looks like.

The school review team observed several examples of unsecured and unmonitored technology items. Teachers left smaller items, such as graphing calculators and tablets, unlocked in several classrooms. These items are especially at risk for theft and susceptible to being misplaced. In addition, the network administrator does not routinely check communications closets, which house main network infrastructure providing Internet and intranet in the district. The review team observed at least one communications closet

that was unlocked. The high school library aide stated that she locks the storage room in the library that contains many technology items, but she is unsure who else has keys to that closet. In addition, the communications closets did not all have smoke detectors or functioning fire extinguishers. Without these items, network infrastructure is susceptible to destruction that also could extend to school areas outside the closet.

Without one inventory system in the district that everyone uses for technology, the district has no effective way to inventory and track all technology items in the district. Without a consistent process for checking out items, this process could vary across campuses, and a campus might not be using the most efficient method. Technology items left unlocked and unattended are susceptible to be stolen or misplaced, especially smaller, portable items.

Effective school districts tag all technology items and log them into one system that includes the tag number, model number, location, cost, and purchase date. Effective school districts also have a consistent process for tagging, inventorying, and checking out technology items, and consistently securing all of these items.

The district should develop and implement processes for inventory management, security of technology items and network infrastructure, and fire safety.

The network administrator and technician should tag all technology items throughout the district, including those received from the prison system. These items should then be inventoried using one system. The LRMS system is an insufficient choice because it cannot generate reports. The Technology Department should use the TxEIS module to maintain its inventory of all technology items.

The network administrator should establish and document procedures for checking out technology and securing technology. He should then train all library aides and teachers on those procedures.

The network administrator should also ensure that each communications closet has a smoke detector and an electronics-safe (Class C) fire extinguisher. The smoke detector in a closet should trigger the regular alarm system so that it can be heard. The fire extinguishers should all be Class C so that they would not ruin the equipment.

The district also should install an Internet protocol (IP) camera in each closet. These video cameras can be installed using existing power and data lines in each closet and do not have to

be connected into the existing security camera infrastructure. Each camera should have infrared capability for low-light or no-light viewing and should be able to connect through Ethernet cable, rather than through wireless networking or cloud-based technology. This connection would enable the Technology Department to monitor all communications closets constantly and to be able to identify issues early and troubleshoot remotely.

The district campuses have eight communication closets. Each smoke detector in these closets costs approximately $50, or $400 total for the eight closets. Each fire extinguisher costs approximately $250, or $2,000 for the eight closets. Each IP camera costs approximately $60, or $480 for the eight closets. The total onetime cost for the district is $2,880 ($400+$2,000+$480).

FISCAL IMPACT

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

RECOMMENDATION	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 7. TECHNOLOGY MANAGEMENT							
32. Eliminate the network administrator position and develop a technology director position.	($6,906)	($6,906)	($6,906)	($6,906)	($6,906)	($34,530)	$0
33. Develop written procedures and plans for all technology functions, develop a new five-year technology plan, and ensure that all technology items are budgeted for and through the Technology Department.	$0	$0	$0	$0	$0	$0	$0
34. Develop a work order system that includes prioritization of technology requests, documentation of work completed, and periodic analysis of trends.	$0	$0	$0	$0	$0	$0	$0
35. Provide consistent staff development for the Technology Department and for all district staff.	$0	$0	$0	$0	$0	$0	$0
36. Develop and implement processes for inventory management, security of technology items and network infrastructure, and fire safety.	$0	$0	$0	$0	$0	$0	($2,880)
TOTAL	**($6,906)**	**($6,906)**	**($6,906)**	**($6,906)**	**($6,906)**	**($34,530)**	**($2,880)**

CHAPTER 8. COMMUNITY INVOLVEMENT

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.

Corrigan-Camden Independent School District (CCISD) is located in Corrigan. Corrigan is located in Polk County, about 95 miles northeast of Houston. Corrigan had a population of 1,587 in 2016, a decrease of 0.5 percent since the official 2010 census. Oriented strand board (OSB) manufacturing is the largest industry in the community, with Georgia-Pacific LLC and RoyOMartin's subsidiary Corrigan OSB located in Corrigan. The per capita income of Corrigan is $18,172, and the average home value is $90,722.

Compared to other towns and cities in Texas, Corrigan is in the top quartile for diversity. In 2010, 40.8 percent of the Corrigan population was white, 42.2 percent African American, 0.1 percent American Indian and Alaska Native, 1.6 percent two or more races, and the remaining 15.1 percent identified as some other race. Latinos of all races represented 22.6 percent of the total population.

The superintendent is responsible for the community involvement function at CCISD, and oversees campus principals responsible for campus-level community involvement.

CCISD schedules community engagement events that include report card pick-up, themed cafeteria meals, awards ceremonies, registration events, student performances and competitions, and the national drug prevention program Red Ribbon Week. The district collaborates with local businesses and organizations, including Corrigan OSB, Corrigan Brookshire Brothers, Torrez Welding, local franchises of Sonic and Whataburger restaurants, South East Texas Food Bank, Georgia-Pacific, and the Corrigan Lions Club.

The superintendent is responsible for open records requests; however, she stated she has received one request since assuming the position in July 2013. Information about requesting information from the district is available in student handbooks and on the district website.

ACCOMPLISHMENTS

♦ Corrigan-Camden ISD participated in a staff development and community involvement event that raised staff awareness of student needs, provided student supplies, and developed a positive community interaction.

♦ Corrigan-Camden ISD's social media page provides district stakeholders with relevant information and celebrates achievements.

FINDINGS

♦ Corrigan-Camden ISD lacks policies and procedures that establish expectations around district communication.

♦ Corrigan-Camden ISD does not plan and oversee its parent and community involvement efforts.

♦ Corrigan-Camden ISD's volunteer program lacks procedures and provides minimal support to students and staff.

RECOMMENDATIONS

♦ **Recommendation 37: Develop and implement districtwide communication procedures to ensure that the district consistently and accurately communicates with the community.**

♦ **Recommendation 38: Conduct a community needs assessment and use the results to drive a long-term,**

districtwide strategic plan for community and family involvement.

♦ **Recommendation 39: Develop a volunteer involvement program that includes written guidelines for campuses and volunteers in addition to recruitment strategies.**

DETAILED ACCOMPLISHMENTS

STAFF AND COMMUNITY EVENT

CCISD participated in a staff development and community involvement event that raised staff awareness of student needs, provided student supplies, and developed a positive community interaction.

During the first day of staff development in school year 2016–17, the superintendent involved all campus staff, including auxiliary staff, in a special event called the Back to School Bus Tour. With the transportation director, the superintendent developed a route of local housing areas that many staff had never visited. Using four buses, the district transported all staff throughout the district to visit students' home communities. Staff on each bus served as a guide and shared information about the geographic area and statistics about the district. At each stop, staff disembarked and interacted with students and community representatives. A local church and district staff donated school supplies, and staff distributed supplies to students at the stops.

District staff reported high satisfaction with the event, and many staff cited the event as a notable accomplishment for the district. The superintendent described the event's purpose as helping staff to build empathy and increase their knowledge of students' lives outside of school. She also indicated that the event was about building relationships, and helping the district and the community to begin the school year with positive initial interactions.

SOCIAL MEDIA PAGE

CCISD's social media page provides district stakeholders with relevant information and celebrates achievements.

CCISD maintains an active Facebook page. Through increased, regularly updated content, the number of users that clicked the Like button on the district Facebook page increased from 335 in 2013 to 1,512 users in January 2017. Staff, parents, and community representatives stated that the district social media page is a helpful, well-utilized resource for the community.

District staff, including the superintendent and curriculum and programs director and a designee at each campus, have administrative privileges to upload content. District postings are celebratory and informative, and cover topics affecting students and families at every campus. The district uses the social media page to recognize community partnerships and donors, provide monthly menus and information about food service events, promote district events from kindergarten registration to fishing team competitions, communicate transportation schedules, and advertise the referral process for the gifted and talented program.

The district also highlights positive achievements in the district through social media posts. The district has recognized student projects, outstanding staff, classes with high attendance, honor roll students, University Interscholastic League competitors, family engagement events, and other positive contributions from district stakeholders.

The district uses its social media page as an effective tool for disseminating information to the community and promoting a positive image of the district by highlighting stakeholder achievements.

DETAILED FINDINGS

COMMUNICATION (REC. 37)

CCISD lacks policies and procedures that establish expectations around district communication.

CCISD communicates with families and community representatives using a number of communication tools. However, the district has no districtwide, written procedures for staff and community representatives.

The superintendent indicated to the Legislative Budget Board's School Performance Review Team that she is responsible for community involvement, and she has not tasked any district staff with supervising or maintaining this function. The district does not have a public information officer or dedicated community involvement positions at the campus or district levels. The superintendent, director of curriculum and programs, and a designated staff from each campus post information and recognize student, staff, and community contributions on the district social media page. District staff also indicated to the review team that positive features in the local newspaper, the *Corrigan Times*, now part of the *Polk County Enterprise*, have increased due to a teacher submitting weekly notices. However, the superintendent does not have procedures to ensure that the district regularly

disseminates information and achievements to the local media.

Community representatives and district staff cited the district's social media page as the primary source for information about the school district. Although the social media page is well-maintained and accessible, the district has not established expectations for appropriate content, frequency, or interaction with the community. Individual staff also maintain closed social media pages for parents. The district does not have procedures for these private pages, and it is unable to monitor content nor to communicate on the pages because staff are not required to add the district as a member or administrator. Staff reported that they receive general guidelines on professional communication, but no additional training or guidance related to specific expectations for communicating with social media.

The district also maintains a website that, as of the beginning of school year 2017–18, contained information for students, staff, parents, and community representatives including handbooks, codes of conduct, and the district calendar. At the time of the review, the district contracted with a third-party vendor to host a new version of the website. Many subpages of the website were not yet constructed, blank, or did not have updated information. The redesigned website lists required information and reports, but it does not provide links to the documents. The website includes a feature that translates the English-language pages into other languages, including Spanish, French, German, Italian, and 30 other languages. The feature provides a basic translation, but the district does not use professional translation or native speakers to provide accurate content for Spanish-speaking families and people in the community. Community representatives and district staff did not indicate that the district website was a primary source of information.

CCISD also communicates with parents through various applications and tools at the campus level and throughout the district, including the district's mass notification system. Through this notification system, the district is able to send updates and emergency alerts to the community through emails, phone calls, or text messages. Many campuses and teachers publish newsletters, but the district does not have guidelines for these newsletters, and district staff do not monitor the frequency or content of the communications.

Without effective communication among all CCISD stakeholders, the district may not have coordinated efforts or a unified vision toward student achievement. Failure to

communicate effectively with parents, teachers, and people in the community may have a negative influence on stakeholders' perceptions of the district. The lack of policies and procedures, and the lack of district oversight to monitor staff use of social media pages as a form of communicating with parents, results in the potential for inconsistent messaging.

Communicating effectively with parents and the community increases parent involvement and community support. Effective school districts use many methods to communicate with parents and their communities. For example, Spigner Elementary School in Calvert ISD publishes several publications to communicate with students, parents, and community representatives. The school publishes a monthly newsletter in English and Spanish that it distributes to all students, staff, and teachers. The school also posts the newsletter in community stores and at the post office. The newsletter features the principal's column, students of the week, students' birthdays, school events, honor roll, and other special dates and topics of interest. The school also distributes a monthly newsletter made specifically for parents by Regional Education Service Center VI (Region 6). It is also printed in English and Spanish and addresses topics such as homework habits, how parents can help their students improve writing, and keeping students safe on the way to and from school.

A districtwide communications plan serves many purposes. It provides public understanding and awareness of the learning opportunities provided for students. Communication with parents, community representatives, and business leaders and the active solicitation of input and feedback ensures that the district considers a range of effects and opportunities that will affect the organization positively and negatively. Effective communication also ensures that all stakeholders in the organization are aware of the district's plans, their roles in implementation, and the level of importance of the plan. Another purpose of the communications plan is to ensure that parents and community representatives are aware of the district's goals and to make the public aware of what supports are needed.

Westphalia and Dripping Springs ISDs both have established effective methods to communicate with parents and the community and to encourage involvement in district programs and activities. For example, Westphalia ISD invites parents and community representatives to chaperone field trips and to attend and participate in school-sponsored activities. In addition, the district publishes and distributes a

newsletter containing information about class activities and an event schedule, and it sends press releases and articles about district activities to area newspapers. Dripping Springs ISD also employs multiple methods to communicate effectively about district accomplishments and challenges. Techniques include activities from informal superintendent visits with area residents at local coffee shops and a district column published in an area biweekly newspaper.

The National Council of Professors of Educational Administration has outlined the following steps to assist districts in developing a communications plan and policy:

- the Board of Trustees authorizes the superintendent to facilitate the development of communications policy;

- the superintendent or his or her designee organizes a communications committee that is representative of school and community key stakeholders (e.g., students, parents, teachers, administrators, community representatives, and the school board); the committee composition should represent 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 as to what improvements need to be made; 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.

CCISD should develop and implement districtwide communication procedures to ensure that the district consistently and accurately communicates with the community.

To implement the communication plan, CCISD 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 meet 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 provide feedback to the district.

In developing the communication plan, CCISD should follow the six steps outlined by the National Council of Professors of Educational Administration. These steps can be modified to meet the particular needs of CCISD.

After the policy is developed and approved by the board, it should be disseminated to all key stakeholders, including board members, district and school staff, parents, and members of related organizations, such as parent groups, media, business and industry, community groups, and local government.

The superintendent should ensure that the network administrator regularly updates the district website and that all required postings are accessible. The district should also formalize its partnership with the local community newspaper to feature the district in each issue. This regular feature for the district could include reports by students, a rotating section for campus news and staff of the month, district events, sports, and other information.

Since the time of the review, district staff indicated that they are restructuring staff assignments, and that a new position of instructional technology director will also be designated as a communication director responsible for internal communication, external communication, and district website updates.

The district could implement this recommendation with existing resources.

STRATEGIC PLAN (REC. 38)

CCISD does not plan and oversee its parent and community involvement efforts.

No position at CCISD is assigned responsibility for coordinating community and parent involvement activities. As a result, few district-level activities are available for community involvement, and little district-level awareness, management, or monitoring of community involvement efforts are made at the campuses. Although the superintendent indicated that she is responsible for community involvement, her other duties make it difficult to effectively identify, plan, and execute opportunities to engage with the community.

During onsite interviews, the superintendent described her efforts to invite local businesses and organizations to collaborate with the district; however, the engagement efforts were isolated and not part of a targeted plan. When initial meetings did not develop further, staff did not use existing, planned strategies and processes to advance development of partnerships.

The superintendent stated that the district does not have short-term or long-term community involvement plans, monitoring, evaluation, or a dedicated budget. The district and its campuses have established a district improvement plan (DIP) and campus improvement plans (CIP). However, the plans are not accessible on the district's website. The district also did not provide documentation that district staff tracked and evaluated DIP and CIP parental involvement goals that specify annual performance targets for increasing parental involvement and community involvement.

Figure 8–1 shows examples of parental involvement activities and strategies from CCISD's school year 2016–17 DIP. When the review team asked the superintendent if the district has a long-term community involvement plan, the superintendent stated that no long-term plans are in place. She did not reference Goal 2 of CCISD's DIP. The review team did not find evidence that staff were maintaining documentation or evaluating outcomes related to DIP community involvement activities and strategies.

District stakeholders, including parents, staff, and community representatives, indicated that the district has a large degree of participation in athletic and extracurricular events, and in community celebrations such as Grandparents Day or Thanksgiving lunch.

However, stakeholders also stated to the review team that community involvement in education was a challenge for the district, including input or membership in district or campus committees. Parents and community representatives indicated that a small number of people are very active and supportive, but that other people in the community are difficult to engage unless they are dissatisfied with the district. District staff and community representatives indicated that, besides attending student recognition ceremonies, the community has little involvement in board meetings, informational sessions, or educational planning. Stakeholders interviewed by the review team identified work schedules, access to transportation, commuting from nearby towns, and the pressures of grandparents raising grandchildren as possible obstacles to community involvement in the district.

The district has few formal partnerships with local businesses and no written procedures for recognizing community partners. District staff track partnerships and share a basic annual report regarding community involvement with the board. Each spring, the district participates in the Texas Association of School Boards program to honor business and community members. The superintendent's secretary works with campus administrators and district directors to compile a list of those to be honored. Each honoree is invited to a board

FIGURE 8–1
CORRIGAN-CAMDEN ISD DISTRICT IMPROVEMENT PLAN, GOAL 2
SCHOOL YEAR 2016–17

STRATEGY	RESOURCES	STAFF RESPONSIBLE	TIMELINE	EVIDENCE OF IMPLEMENTATION
Provide academic progress reports for all students at all campuses at the third week of each six-week grading period.	District staff	Principal, counselors, teachers	Every three weeks	Report cards and progress reports
Provide opportunities at least twice during the school year for parents to meet with teachers to pick up six-week report cards.	District staff	Principals, teachers	Second and fourth six-week periods	Sign-in sheets
Provide translators at all after-school meetings at all campuses.	District staff, local funds	Principals	August 2016 to June 2017	Sign-in sheets
Provide Language Proficiency Assessment Committee (LPAC) meetings.	District staff	Counselors	Twice during the spring semester	LPAC documentation
Provide grade-level parent meetings to help parents understand student expectations at all campuses with focus on grade-specific assessments, expectations, and curriculum.	District staff	Grade-level leaders, principal	August 2016 to June 2017	Sign-in sheets, agenda, meeting notes
Establish communication through school website and social media to improve communication with parents and students.	District staff	Principals, superintendent, curriculum and programs director	August 2016 to June 2017	Website and social media pages posts

SOURCE: Corrigan-Camden ISD District Improvement Plan, school year 2016–17.

meeting for presentation of awards. Community representatives reported that they frequently receive fund-raising requests from individual students, especially those in competitive student groups. However, the fund-raising efforts were not coordinated by the district or incorporated into a long-term vision for community fund-raising and support. CCISD has not established an educational foundation to streamline donations and provide additional funds for student programs.

CCISD does not house a community education center and does not offer community education courses for parents or community representatives. Corrigan-Camden Elementary School provides a number of wraparound support services for students, including eyeglasses provided by the Lions Club, holiday presents and meals, backpacks of food for families, and referrals to mental health services. Other campuses also maintain some partnerships to provide limited wraparound services for secondary students. However, district-level staff are not involved in soliciting and maintaining partnerships to provide coordinated wraparound services for all students and families.

The lack of a consistent mechanism or strategy to engage parents and the local community has resulted in low engagement of these constituencies. Parent involvement is linked to student academic performance. Parent involvement has been proven throughout academic literature to be crucial to students' academic success. CCISD's academic performance is consistently at levels less than its peer districts and the state average. Parent involvement is important for students at all age levels, because the parent involvement level is a strong predictor of student success even for high school students.

Research has linked parent involvement to other positive outcomes for students, including improved attendance, increased motivation, increased self-esteem, decreased drug and alcohol use, and fewer incidences of violent behavior. The more that parents participate in schooling—such as conducting fund-raisers, joining booster clubs, and volunteering—the higher the achievement effects might be for students. The conclusion is that parent involvement is crucial to students' successes in and out of the classroom.

Without formal, successful procedures for establishing, maintaining, and recognizing district partnerships with community organizations and businesses, the district could fail to maximize community support and funding. A lack of district planning and oversight of community education and student wraparound services could result in lost opportunities for providing sufficient support services for students and families.

From 1998 to 2005, University-Community Partnerships at Michigan State University's (MSU) Office of University Outreach and Engagement published a series of 34 Best Practice Briefs. The briefs summarize research-based information about human service concepts, processes, models, and tools for funding contributors, policy makers, and service organizations. A brief in this series titled *Why Parent Involvement is Important to School Performance* covers ways parents can be involved with schools. The material is organized with checklists to facilitate self-study by school staff. Research outlined in the best practice brief noted the following aspects:

- when parents are involved in education, students exhibit the following results:

  ◦ achieve more, regardless of socioeconomic status, ethnic or racial background, or the parents' education level;

  ◦ have higher grades and test scores, have better attendance, and complete homework more consistently; and

  ◦ exhibit more positive attitudes and decreased alcohol use, violence, and antisocial behavior;

- different types of parent and family involvement produce the following gains:

  ◦ when parents collaborate with teachers, educators hold higher expectations of students and higher opinions of the parents; children from diverse cultural backgrounds tend to do better because parents and professionals bridge the gap between the culture at home and the learning institution; and

  ◦ when parents are involved in full partnerships (i.e., decision making), student achievement among economically disadvantaged children improves and can reach levels that are standard for middle-class children.

This brief also presents a comprehensive self-study assessment tool that districts could use when evaluating their parental involvement activities. The complete assessment can be accessed at engage.msu.edu/.

Waxahachie ISD has a parent council that includes parent–teacher organization presidents from the majority of the district's campuses and meets four times per year. District administrators also may attend these meetings to provide information about specific programs or initiatives. Meetings provide a forum to address issues and share information that concerns parents districtwide. The parent council supports the district by recruiting additional volunteers, maintaining communications among district stakeholders, and volunteering at district events.

CCISD should conduct a community needs assessment and use the results to drive a long-term, districtwide strategic plan for community and family involvement.

The district should conduct a needs assessment to develop an increased understanding of parental availability, barriers to involvement, and desired methods and opportunities for involvement. The district can use the MSU self-assessment tool as a component of the assessment.

The district should develop a community involvement committee to address results of the needs assessment and draft a long-term plan. The plan should include the following components:

- parental and community involvement strategies;

- volunteer recruitment, training, tracking, and recognition program;

- delineation of roles and responsibilities, including a district-level point of contact and designees for each campus;

- development of long-term goals and strategies for community partnership, including exploring establishing an educational foundation; coordinated fund-raising strategies, especially for student groups; coordinated solicitation and maintenance of partnerships with local businesses and community organizations; attendance and visibility at community events; coordination of a vision for community services at the district level; and community education goals; and

- monitoring and tracking of community involvement, including sharing reports with the board and community stakeholders; identifying trends, needs, and goals; and coordinating the plan with the DIP and CIPs, including informed, measurable goals for increased involvement.

The district should recruit parents and community representatives to serve on standing committees, including

their increased involvement in decision-making and policy committees.

The district could implement this recommendation with existing resources.

VOLUNTEERS (REC. 39)

CCISD's volunteer program lacks procedures and provides minimal support to students and staff.

The district does not have a coordinated plan to market any of its volunteer opportunities for individuals who may be interested. The district website does not feature a section for people in the community who may be interested in volunteering. For those parents who 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 such information, campuses are challenged to establish a volunteer contact list for events and fund-raisers. Without information about the number of hours by volunteer and by campus, the district lacks historical information regarding volunteer interest and participation, especially for events that may be repeated in subsequent years.

Figure 8–2 shows the results of a question from surveys the review team conducted of parents and campus staff regarding parental and community volunteers at CCISD. Nearly half of parents and campus staff responded that they disagree or strongly disagree that campuses have a sufficient number of volunteers to help with student and school programs.

CCISD's Board Policy GE (LEGAL), regarding relations with parent organizations, indicates that the board will cooperate in the establishment of at least one parent-teacher organization (PTO) at each campus. PTOs are nonprofit organizations formed by parents, teachers, and district staff to support and provide additional volunteer infrastructure to their local schools. During onsite interviews, staff indicated that PTOs were virtually nonexistent at all district campuses. District staff indicated that the district had an active PTO at the elementary level during school year 2015–16, but that participation had dwindled until very few parents remained.

Effective school districts count and track what they value, such as the names of the volunteers who participate and the number of hours volunteered. School districts recognize that without volunteers to perform certain functions, the district may need positions to perform those functions at an additional expense. Parent and community volunteer hours

FIGURE 8–2
CORRIGAN-CAMDEN ISD PARENTS AND CAMPUS STAFF SURVEY RESULTS
SEPTEMBER 2017

SCHOOLS HAVE A SUFFICIENT NUMBER OF VOLUNTEERS TO HELP STUDENT AND SCHOOL PROGRAMS.

GROUP	RESPONDENTS	STRONGLY AGREE OR AGREE	NO OPINION	DISAGREE OR STRONGLY DISAGREE
Parents	60	35.0%	16.7%	48.3%
Campus Staff	93	32.3%	18.3%	49.5 %

NOTE: Totals may not sum to 100.0 percent due to rounding.
SOURCE: Legislative Budget Board School Performance Review Team, September 2017.

enable school districts to conserve valuable financial resources and funds.

With the absence of a comprehensive volunteer program, CCISD and individual campuses are also missing an opportunity to build reciprocal trusting relationships among parents, staff, and the community. This relationship is not just about what potential volunteers can offer the district or the campus, but it is also about what the campus can offer volunteers to build trust, skills, and connections that are mutually beneficial. Volunteers can affect the overall success of the educational system. They can enable teachers and staff to use their time for instruction. They can provide more opportunity for students to have one-on-one learning. 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 those who 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.

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 Parent Involvement Manual 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 manual in the following ways: to enable 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 manual includes surveys, handouts, activities for meetings, and research on parental involvement.

The National Parent Teachers Association's Seven Steps to a Successful Volunteer Program provides useful information for developing and maintaining an active school volunteer program. The program includes 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.

The districtwide volunteer program in Denton ISD is one of the responsibilities of its office of communications and community relations. The district recruits volunteers who are parents, business leaders, or community representatives by using its website to provide information about the program, a code of conduct for volunteers, and an online application to

apply for volunteering. 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 caring adults into the lives of students, and strengthening partnerships among homes, schools, and the community.

San Elizario ISD has a parent volunteer program that had approximately 130 parent volunteers within the district of more than 4,000 students. Those volunteers accounted for nearly 20,000 hours of volunteer time in one academic year. Volunteers within the district 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, provides support for parent liaisons and other district parents, and provides feedback regarding program implementation and program activities.

CCISD should develop a volunteer involvement program that includes written guidelines for campuses and volunteers in addition to recruitment strategies.

The district 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 Parent Involvement Manual as a guideline. The committee should designate a representative at each campus responsible for implementing a PTO. The superintendent or her designee should implement this program, including producing news releases to announce the volunteer program and to explain how interested individuals may apply.

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 should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 8. COMMUNITY INVOLVEMENT							
37. Develop and implement districtwide communication procedures to ensure that the district consistently and accurately communicates with the community.	$0	$0	$0	$0	$0	$0	$0
38. Conduct a community needs assessment and use the results to drive a long-term, districtwide strategic plan for community and family involvement.	$0	$0	$0	$0	$0	$0	$0
39. Develop a volunteer involvement program that includes written guidelines for campuses and volunteers in addition to recruitment strategies.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 9. TRANSPORTATION

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 Texas 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 may either contract for or self-manage their transportation operations. Using a contracted management model, districts rely on the company to provide supervision of its transportation operation. In this arrangement, a district may rely on the company to provide all or some staff, or 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 relies on a district's annual submission of certain transportation reports to the Texas Education Agency (TEA), and funding is determined by a formula that includes the number and type of students transported.
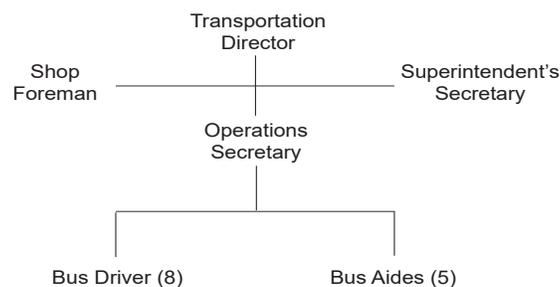
Corrigan-Camden Independent School District (CCISD) self-manages its transportation operations, which are run by the district's Transportation Department. The transportation director oversees the department and has held that position for three years. The transportation director also oversees the district's facilities and maintenance functions. The staff of the Transportation Department includes the transportation director, one mechanic, one operations secretary, eight bus drivers, five bus aides, and a shop foreman. The transportation director reports directly to the superintendent. The operations secretary assists with dispatch functions, answering the telephone for transportation-related issues, helping to track mileage, and reporting to TEA. All transportation department staff are housed at the transportation fleet maintenance facility. The facility is located on the same campus as the junior high school and high school. The fleet maintenance facility has a fuel point dispensing diesel and unleaded gasoline. The fleet maintenance garage area has three garage bays for performing maintenance on the route buses and spare buses, district vehicles, and various types of powered equipment. The spare parts inventory storage, maintenance records, and office space for the maintenance technicians is located in an area within the maintenance bays. The transportation mechanic and shop foreman perform most of the repairs to buses and the 10 other district vehicles.

Figure 9–1 shows the organizational structure of CCISD's Transportation Department.

FIGURE 9–1
CORRIGAN–CAMDEN ISD TRANSPORTATION SERVICES DEPARTMENT
SCHOOL YEAR 2017–18

Sources: Legislative Budget Board School Performance Review Team, September 2017; Corrigan-Camden Independent School District, October 2017.

CCISD had 917 students enrolled in prekindergarten to grade 12 during school year 2016–17. The district provided regular and special services transportation to approximately 535 students. Students are transported to the elementary school, junior high school, and high school on 17 regular education routes and two special education routes. **Figure 9–2** shows that the district's student ridership decreased from school years 2013–14 to 2015–16. Total annual mileage for regular and special programs also decreased during the same time period. Student enrollment decreased by 60 students from school years 2013–14 to 2015–16.

According to TEA's School Transportation Route Services and Operations Report for school year 2015–16, the district operated 19 buses to transport 535 students with a total annual mileage of 92,217 for regular and special education students combined. At the time of the Legislative Budget Board's School Performance Review Team's onsite visit, CCISD had 26 buses in its fleet. Additionally, the district has 10 vehicles called the white fleet, made up of sport utility vehicles and vans and that are used primarily to transport a small number of students to special events and extracurricular activities. The total operating cost for the Transportation Department for

school year 2015–16 was $445,896 ($431,171 related to regular route operations and $14,725 for special education route costs).

Figure 9–3 shows key measures of cost-effectiveness for CCISD transportation operations from school years 2013–14 to 2015–16. **Figure 9–3** shows a year-to-year decrease in the number of student riders and total mileage for all programs along with an increase in the cost per mile for regular programs.

These measures for cost-effectiveness enable a comparison among CCISD and peer districts. Peer districts are districts similar to CCISD that are used for comparison purposes. The peer districts compared to CCISD are City View, Keene, and Roosevelt ISDs. **Figure 9–4** shows the key measures of the peer districts' transportation services compared to CCISD. Based on totals reported to TEA, CCISD's cost per program mile is greater than that of its peers, and its cost per special program mile is significantly less than those reported by peer districts. Based on interviews with district staff, the Business Office changed the way the district reported regular and special program mileage from an allocation method to actual mileage beginning in school year 2014–15.

FIGURE 9–2
CORRIGAN–CAMDEN ISD'S TRANSPORTATION ROUTING AND STATE FUNDING DATA
SCHOOL YEARS 2013–14 TO 2015–16

CATEGORY	2013–14	2014–15	2015–16
Average Daily Ridership – Total Students	629	565	535
Total Annual Mileage, Regular and Special Programs	106,908	105,952	92,217
Total Annual Mileage, Career and Technology Program	0	5,630	5,704
Total Annual Allotment	$94,079	$108,235	$87,579

SOURCE: Texas Education Agency, School Transportation Route Services Report, school years 2013–14 to 2015–16.

FIGURE 9–3
CORRIGAN–CAMDEN ISD KEY MEASURES OF TRANSPORTATION COST-EFFECTIVENESS
SCHOOL YEARS 2013–14 TO 2015–16

MEASURE	2013–14	2014–15	2015–16
Total Costs	$517,882	$434,255	$445,896
Total Student Riders, All Programs	629	565	535
Number of Route Buses	21	18	19
Total Mileage, All Programs	106,908	105,952	92,217
Annual Cost per Transported Student	$823	$769	$833
Annual Cost per Route Bus	$24,661	$24,125	$23,468
Cost per Mile, Regular Program	$2.68	$3.09	$3.34
Cost per Mile, Special Program	$1.58	$0.71	$0.58

SOURCE: Texas Education Agency, Student Transportation Operations and School Transportation Route Services reports, school years 2013–14 to 2015–16.

FIGURE 9–4
COMPARISON OF KEY MEASURES OF TRANSPORTATION COST-EFFECTIVENESS AMONG CORRIGAN–CAMDEN ISD AND PEER DISTRICTS
SCHOOL YEAR 2015–16

DISTRICT	OPERATIONS COST	TOTAL BUSES	TOTAL RIDERS	COST PER REGULAR PROGRAM MILE	COST PER SPECIAL PROGRAM MILE
Corrigan-Camden ISD	**$445,896**	**19**	**535**	**$3.34**	**$0.58**
City View ISD	$171,387	10	313	$2.96	$2.57
Keene ISD (1)	N/A	N/A	N/A	N/A	N/A
Roosevelt ISD	$605,824	23	777	$2.85	$2.60

NOTE: (1) Keene ISD does not provide transportation services.
SOURCE: Texas Education Agency, Student Transportation Operations and School Transportation Route Services reports, school year 2015–16.

ACCOMPLISHMENT

♦ CCISD purchased and installed cameras on buses to improve student behavior and safety and security.

FINDINGS

♦ CCISD lacks standard operating and safety procedures for Transportation Department staff.

♦ CCISD does not track performance of its buses.

♦ CCISD lacks a program for Transportation Department staff to gain additional driver safety awareness and skills.

♦ CCISD owns and maintains buses that are not being used and operates the transportation services program without a board policy to guide bus replacement.

RECOMMENDATIONS

♦ **Recommendation 40: Develop written standard operating and safety procedures.**

♦ **Recommendation 41: Develop performance metrics to measure the effectiveness and efficiency of the Transportation Department.**

♦ **Recommendation 42: Supplement mandated state driver training programs with periodic refresher courses to promote a culture of safety and a high level of driver skill.**

♦ **Recommendation 43: Develop a board policy for bus replacement and spares based on the vehicle's mileage and age, including guidance on when the district should dispose of a vehicle.**

DETAILED ACCOMPLISHMENT

INSTALLATION OF CAMERAS ON BUSES

CCISD purchased and installed cameras on buses to improve student behavior and safety and security.

Although installing interior-view cameras on buses is common in many districts, the Transportation Department procured cameras that record interior and exterior views of the bus. Transportation Department staff e-mail or deliver to school administrators digital copies of recordings to follow up on student behavior issues that occur while students are on or around the bus. Bus drivers said that since the district installed the cameras during school year 2014–15, the number of student behavior incidents has decreased. The Transportation Department also procured surveillance cameras that have been installed in the bus yard and garage area.

DETAILED FINDINGS

STANDARD OPERATING PROCEDURES (REC. 40)

CCISD lacks standard operating and safety procedures for Transportation Department staff.

CCISD's Transportation Department has no formal, written department operating procedures or safety protocols to guide staff in their daily activities or in emergency situations. The department's daily operations are based on the institutional knowledge of the staff.

The lack of procedures increases the risk of information being reported incorrectly to TEA. For example, the department has no written definition of what constitutes a school bus accident and no written procedures guiding staff what to do (and in what sequence) if a bus accident occurs. CCISD reported no accidents to TEA during the previous

three school years. However, at least one bus incurred minor damage during the past year, but the department does not have guidance as to what constitutes an accident. The Texas Education Code, Section 34.015, requires that districts report to TEA all accidents involving school buses. However, according to the transportation director, the district did not report the incident to TEA because it did not involve another vehicle and was not viewed as an accident.

Additionally, the department's lack of procedures could decrease staff accountability and negatively affect operations. The drivers complete a form daily that includes a morning check before trips and an afternoon check after trips for regular routes. The form also includes mileage at each check. However, no documentation is included regarding how the process is monitored, who does the monitoring, or how preventive maintenance inspections are documented in the district.

The success of a transportation operation depends largely on the staff's knowledge. Without written procedures, staff may be unaware of steps to follow in certain situations. The development and adoption of safety-related procedures helps to inform all transportation staff of the safety standards and supporting rules and regulations that are intended to support students' safety. In the absence of such procedures, departmental staff may unknowingly violate student transportation rules and regulations.

Transportation department best practices include detailing items such as the following:
- the mission of the transportation department;
- the departmental organizational structure;
- a detailed description of the daily responsibilities of transportation department staff; and
- departmental safety procedures, including the following:
  ◦ inspections before and after trips;
  ◦ railway crossing procedures;
  ◦ loading zone procedures;
  ◦ departmental training policies;
  ◦ ride-time goals; and
  ◦ processes for monitoring and reporting performance.

Austin ISD's Transportation Department webpage provides links to regular and special needs procedures. Each of the procedure areas are available in English and Spanish, helping to ensure that useful and important information is provided to the community.

CCISD's Transportation Department should develop written standard operating and safety procedures.

The superintendent should form a committee including the transportation director, bus drivers, the human resources director, and the mechanic to develop the transportation manual. The transportation director can compile all transportation-related procedures into a transportation manual. The transportation director should submit a rough draft of the manual to the superintendent and the Board of Trustees for review and approval. Upon approval by the school board, the transportation director should print and distribute the manual to all Transportation Department staff at the beginning of the school year and to every newly employed bus driver, substitute bus driver, and bus aide.

The district could implement this recommendation with existing resources.

PERFORMANCE METRICS (REC. 41)
CCISD does not track performance of its buses.

During onsite interviews, principals and coaches indicated that the Transportation Department effectively coordinates daily student transportation at its campuses and afterschool student activity transportation. However, the transportation director indicated that the department does not systematically track any performance metrics.

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

Figure 9–5 shows transportation best practices used in other districts or noted in transportation research. CCISD does not use industry benchmarks to assess the department's effectiveness.

The result of the Transportation Department's failure to accurately track and report performance metrics is that it may not be operating as efficiently as possible. CCISD's lack of tracking performance measures makes it difficult to ensure

FIGURE 9–5
TRANSPORTATION INDUSTRY BEST PRACTICES

GOAL	MEASURE
Preventable Accidents	1:100,000 miles
On-time Performance	99.5% (includes all services)
Routing Utilization Efficiency	80.0% of available time or available capacity
Runs per Bus (morning)	2.3 to 2.5 (triple-tiered system)
	1.6 to 1.9 (double-tiered system)
Bus-to-Mechanic Ratio	25 to 30:1 (depends on fleet type and age)
Spare Bus Ratio	12.0% to 15.0% (depends on fleet mix and trip volume)
Driver Turnover Rate	Less than 15.0%
Parts Cost per Mile (without labor)	$0.16 to $0.18 (depends on fleet type and age)
Maintenance Cost per Mile	$0.39 to $0.43 (depends on fleet type and age and assumes 13,000 miles per bus per year)
(parts, supplies, and labor)	
Fleet Miles per Gallon (mpg)	6.0 mpg to 7.0 mpg (depends on fleet mix, type, age)
Driver Labor Percentage of Operating Costs	39.0% to 43.0% (excluding benefits and workers' compensation)
Total Labor Percentage of Operating Costs	54.0% to 61.0% (excluding benefits and workers' compensation)
Insurance and Risk Percentage of Cost	5.0% to 10.0% (excluding workers' compensation)
Annual Cost per Bus Operated	$30,000 to $50,000 per bus (no capital cost)
Special Education Services	
• Percentage of Pupils Transported	5.0% to 10.0%
• Percentage of Service Time	20.0% to 40.0%
• Percentage of Total System Costs	30.0% to 50.0%
Fleet Useful Life	10,000 miles to 15,000 miles per year – 180,000 miles maximum
	10 years to 12 years; spare vehicles, 11 years to 13 years

SOURCES: Council of the Great City Schools, 2010; American School and University Magazine, 2005; National Association of State Directors of Pupil Transportation, 2010.

that students are transported safely and in the most efficient and effective means possible.

Incorporating performance metrics into transportation operations enables effective districts to see how well or how poorly their transportation operations function. Data from the performance metrics is used by effective districts to make data-driven decisions supported by objective evidence.

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

The transportation director should develop the initial set of performance metrics, then communicate them to all stakeholders.

Figure 9–6 shows critical areas that the district should consider including in a tracking system for performance metrics.

The transportation director should compare actual performance against the selected benchmarks to determine where improvements are needed. The transportation director regularly should report performance information, including goals and areas for improvement, to the superintendent. After the initial set of performance metrics are established, the transportation director should communicate them to all stakeholders.

The district could implement this recommendation with existing resources.

DRIVER TRAINING (REC. 42)
CCISD lacks a program for Transportation Department staff to gain additional driver safety awareness and skills.

FIGURE 9–6
CORRIGAN-CAMDEN ISD CRITICAL TRANSPORTATION MEASUREMENTS

MEASURE	COMPONENT
Cost Efficiency	Cost Per Mile
	Cost Per Bus
	Cost Per Student
Cost-effectiveness	On-time Performance
	Spare Bus Ratio
	Driver Absentee Rate
	Average Student Occupancy Rate
Safety	Accidents Per 100,000 Miles
	Student Behavior Incidents Per Month
Maintenance	On-time Preventive Maintenance Inspections
	Bus Fleet Miles per Gallon (Diesel)
	Miles Between Road Calls (Reactive Maintenance)
	Maintenance Cost per Bus (Annual Report)

SOURCE: Legislative Budget Board School Performance Review Team, October 2017.

Bus drivers do not receive training beyond the state's required courses for driver certification and recertification. The Texas Department of Public Safety requires new bus drivers to complete a 20-hour initial certification class and a refresher course every three years. The Regional Education Service Center XX (Region 20) provides these courses at a cost of $100 for new drivers and $50 for drivers requiring refresher courses. During onsite interviews, CCISD staff indicated that all bus drivers' certifications are current and comply with these requirements. The review team reviewed transportation files to confirm that all drivers' certifications are current and in compliance with certification requirements.

The district relies on the driver training programs provided by the regional education service center and according to the transportation director, staff members are required to view safety videos. The Transportation Department does not provide any safety awareness, defensive driving, skill improvement, or student behavioral management training for transportation-related issues. Transportation Department staff indicated that they do not know what they should be doing regarding additional driver training.

During onsite observations of district bus routes, the review team noted several examples of bus drivers not following standard safety protocols. For example, CCISD bus drivers

began driving before all students were seated. Additionally, drivers stopped on the side of a highway without pulling completely off the road when dropping off students.

Without additional training beyond the state requirements, bus drivers transport students for three years without any refresher training on procedures to ensure student safety. The National Association of State Directors of Pupil Transportation Services (NASDPTS) recognizes the importance of school bus driver training. In its 2000 publication *School Bus Drivers – Their Importance and Training*, NASDPTS states, "A modern, safe, well-maintained school bus operating on the best possible terrain with ideal loading zones cannot compensate for an ill-trained school bus driver."

Examples of the benefits of regular training include the following:

- periodic training helps drivers to retain critical operational and safety-related information that was provided during the refresher course or previous training sessions;

- regular training keeps drivers informed of changes in technology and rules and regulations regarding the operation of school buses; and

- a periodic review of district policies and procedures and industry best practices can help to reduce the complacency that can occur in any profession or industry.

The National Highway Transportation Safety Administration (NHTSA) has developed a safety program called the School Bus Driver In-service Safety Series. This resource is available for use without charge to support transportation supervisors in providing useful training and skills improvement information to drivers. The material includes a guide for the instructor, presentation materials, and handouts for drivers. Training topics include the following:

- driver attitude;

- student management;

- highway-rail grade crossing safety;

- vehicle training;

- knowing the route;

- loading and unloading procedures;

- emergency evacuation;

- transporting students with special needs, and

- driving in adverse weather conditions.

CCISD should supplement mandated state driver training programs with periodic refresher courses to promote a culture of safety and a high level of driver skill.

To support a regular and consistent training program for CCISD drivers, the following implementation steps should be considered:

- The transportation director and the superintendent should ensure that departmental training initiatives are supported and that all bus drivers are permitted to attend training programs. For example, it is common for smaller districts whose staff have multiple roles within the district to have schedule conflicts when training programs are provided. The transportation director should schedule professional development programs in a manner that enables staff to attend transportation-related training programs periodically;

- The transportation director should investigate the resources that are available to develop an effective training program. The transportation director should ensure that regular training topics include safety-related concerns that are unique to CCISD including, for example, truck traffic influenced by local industries or amending route paths to improve student safety; and

- The mandated three-year refresher courses and the periodic training programs should be well-documented and archived. This documentation helps ensure that the district can provide proof that it has been diligent in providing drivers with safety-related and skills improvement training if a vehicle is involved in a traffic accident.

The district could implement this recommendation with existing resources.

BUS REPLACEMENT POLICY (REC. 43)

CCISD owns and maintains buses that are not being used and operates the transportation services program without a board policy to guide bus replacement.

CCISD lacks a written bus or white vehicle replacement plan or disposal policy. White vehicles are vans or sport utility vehicles (SUV) that are used to primarily for staff use and professional development. Four cars and SUVs and six vans make up the district's white fleet. These vehicles are used for transporting students on special trips.

During onsite interviews, staff indicated that the transportation director periodically assesses the condition of the buses and makes recommendations to the superintendent regarding the need to purchase or dispose of buses. As a result, decisions regarding when to replace buses is ad hoc and not based on industry replacement criteria commonly used as a best practice in well-managed transportation departments.

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

The district has 26 school buses, including 19 that are used in regular and special education routes, two that are used as spares, and five additional buses that are maintained but not used in daily operations. According to the transportation director, the additional buses are licensed and registered but have been retired and rarely are used by the department. The fleet has an average age of 12.8 years, ranging from one year old to 21 years old.

Figure 9–7 shows the district's bus inventory. CCISD has four buses that are more than 20 years old.

NASDPTS's 2002 report, *School Bus Replacement Considerations*, recommends a maximum age of 15 years for Type C buses, the type of all CCISD's buses. According to surveys conducted by *School Bus Fleet*, a publication for public school transportation departments, in 2013, the average age of school buses was 9.3 years, which is less than the CCISD buses' average age of 12.8 years.

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

FIGURE 9–7
CORRIGAN-CAMDEN ISD BUS INVENTORY BY MODEL YEAR
SCHOOL YEAR 2015–16

MODEL YEAR	BUS AGE (IN YEARS)	QUANTITY
2017	1	1
2015	2	1
2014	3	2
2011	6	1
2007	10	1
2006	11	4
2005	12	1
2004	13	2
2003	14	1
2002	15	3
2001	16	2
2000	17	1
1999	18	2
1997	20	3
1996	21	1
Total		**26**

SOURCES: Legislative Budget Board School Performance Review Team, October 2017; Corrigan-Camden ISD, December 2016.

The fiscal impact assumes that the district disposes of the five surplus school buses. The fiscal impact assumes that the district sells the surplus buses for a $5,000 onetime gain (5 buses x $1,000 per bus). Additionally, the fiscal impact assumes an approximate annual savings of $5,000 (5 buses x $1,000) for the registration, inspection, and insurance related to keeping the buses available for service. The fiscal impact may be greater or less depending on the sales price for each bus and the actual costs for registering, inspecting, and insuring each bus.

that buses be replaced every eight years to 15 years, depending upon the type of bus and level of use. Buses older than 16 years are often not compliant with current regulations and policies.

CCISD should develop a board policy for bus replacement and spares based on the vehicle's mileage and age, including guidance on when the district should dispose of a vehicle.

The CCISD transportation director should develop the policy in coordination with the superintendent. After the policy has been developed, the superintendent should submit it to the CCISD board for consideration. The policy should be data-driven, based on objective criteria such as miles, age of the school bus, and parts used to maintain the serviceability, or a combination of criteria. Depending on the criteria, the district may need to replace some buses within the next two years to five years. The replacement criteria will assist the district to keep the maintenance costs down, streamline the process to maintain a cost-effective school bus fleet, and reduce the average age of the fleet.

FISCAL IMPACT

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

RECOMMENDATION	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 9. TRANSPORTATION							
40. Develop written standard operating and safety procedures.	$0	$0	$0	$0	$0	$0	$0
41. Develop performance metrics to measure the effectiveness and efficiency of the Transportation Department.	$0	$0	$0	$0	$0	$0	$0
42. Supplement mandated state driver training programs with periodic refresher courses to promote a culture of safety and a high level of driver skill.	$0	$0	$0	$0	$0	$0	$0
43. Develop a board policy for bus replacement and spares based on the vehicle's mileage and age, including guidance on when the district should dispose of a vehicle.	$5,000	$5,000	$5,000	$5,000	$5,000	$25,000	$5,000
TOTAL	**$5,000**	**$5,000**	**$5,000**	**$5,000**	**$5,000**	**$25,000**	**$5,000**