



LEGISLATIVE BUDGET BOARD

Presidio Independent School District Management and Performance Review

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**Legislative Budget Board Staff
Resources for Learning, LLC**

September 2014



LEGISLATIVE BUDGET BOARD

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September 24, 2014

Mr. Dennis McEntire
Superintendent
Presidio Independent School District

Dear Mr. McEntire:

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

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

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 Legislative Budget Board (LBB) engaged Resources for Learning LLC to conduct and produce this review, with LBB staff working in a contract oversight role.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ursula Parks", written over a horizontal line.

Ursula Parks
Director
Legislative Budget Board

/kk

cc: Alfred Muniz
Ethel Barriga
Velva Saenz
Carlos Nieto

Helio Franco
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TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
DISTRICT LEADERSHIP, ORGANIZATION, AND MANAGEMENT	9
EDUCATIONAL SERVICE DELIVERY	25
FINANCIAL MANAGEMENT	41
PURCHASING.....	55
ASSET AND RISK MANAGEMENT	61
HUMAN RESOURCES	73
FACILITIES MANAGEMENT	87
CHILD NUTRITION SERVICES	97
TRANSPORTATION.....	123
COMPUTERS AND TECHNOLOGY	133
COMMUNITY INVOLVEMENT	147
SAFETY AND SECURITY	153

EXECUTIVE SUMMARY

The Texas Legislature created the school performance review in 1990 to “periodically review the effectiveness and efficiency of the budgets and operations of school districts” (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 are typically 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 prior to conducting the onsite review, the LBB’s review team requests data from both the district and multiple state agencies, including the Texas Education Agency (TEA), the Texas Department of Agriculture and the Texas School Safety Center. In addition, LBB may implement other methods for obtaining feedback on district operations such as surveys of parents, community members, and district and campus staff. While onsite in the district, information is gathered through multiple interviews and focus groups with district and campus administrators, staff, and the Presidio ISD Board of Trustees.

Presidio Independent School District (Presidio ISD) is located near the crossroads of Farm to Market Road 170 and US Route 67 on the Mexican-American border in Presidio, Texas, 255 miles southeast of El Paso, 154 miles southwest of Fort Stockton, and 465 miles west of San Antonio. The city of Presidio is located at the southern edge of Presidio County and is the largest city in the county. The district is served by Regional Education Service Center XVIII (Region 18) located in Midland. According to the 2010 census, the City of Presidio had a population of 4,426, an increase of 6.2 percent since the 2000 census. The state legislators for the district are Senator Jose Rodriguez and Representative Poncho Nevárez.

The district has three instructional campuses, including Presidio High School, Franco Middle School, and Presidio Elementary School. In school year 2012–13, enrollment totaled 1,440 students.

Presidio ISD is a high-minority, high-poverty district. In school year 2012–13, 95.9 percent of its students were Hispanic; 87.4 percent of students were identified as economically disadvantaged (27 percentage points over the state average of 60.4 percent); 54.3 percent were identified as English Language Learners (more than three times the state average of 17.1 percent); and 68.1 percent of students were identified as at risk (23.4 percentage points over the state average of 44.7 percent).

EDUCATIONAL OVERVIEW

Presidio ISD has a history of consistent academic achievement. Under the state accountability system, the district was rated Met Standard for school year 2012–13, Academically Acceptable in school year 2010–11, and Recognized in school year 2009–10. In school year 2012–13, the most recent state accountability data available at the time of the review, each campus and the district as a whole were rated Met Standard. **Figure 1** shows state accountability ratings for the past five years for the district and the individual campuses under the previous system (Exemplary, Recognized, Acceptable, or Academically Unacceptable) and the revised system implemented in school year 2012–13 (Met Standard, Improvement Required, or Not Rated).

Presidio ISD’s academic performance is better than regional and state averages in some areas, and below in others. **Figure 2** shows various academic measures of Presidio ISD to the average of other school districts in Region 18 and the state. Presidio ISD exceeds the Region 18 average in advanced course/dual enrollment completion, SAT/ACT percentage of students tested and the number of graduates enrolled in a Texas institution of higher education. Presidio ISD falls below the state average in all indicators except SAT/ACT percentage of students tested.

FINANCIAL OVERVIEW

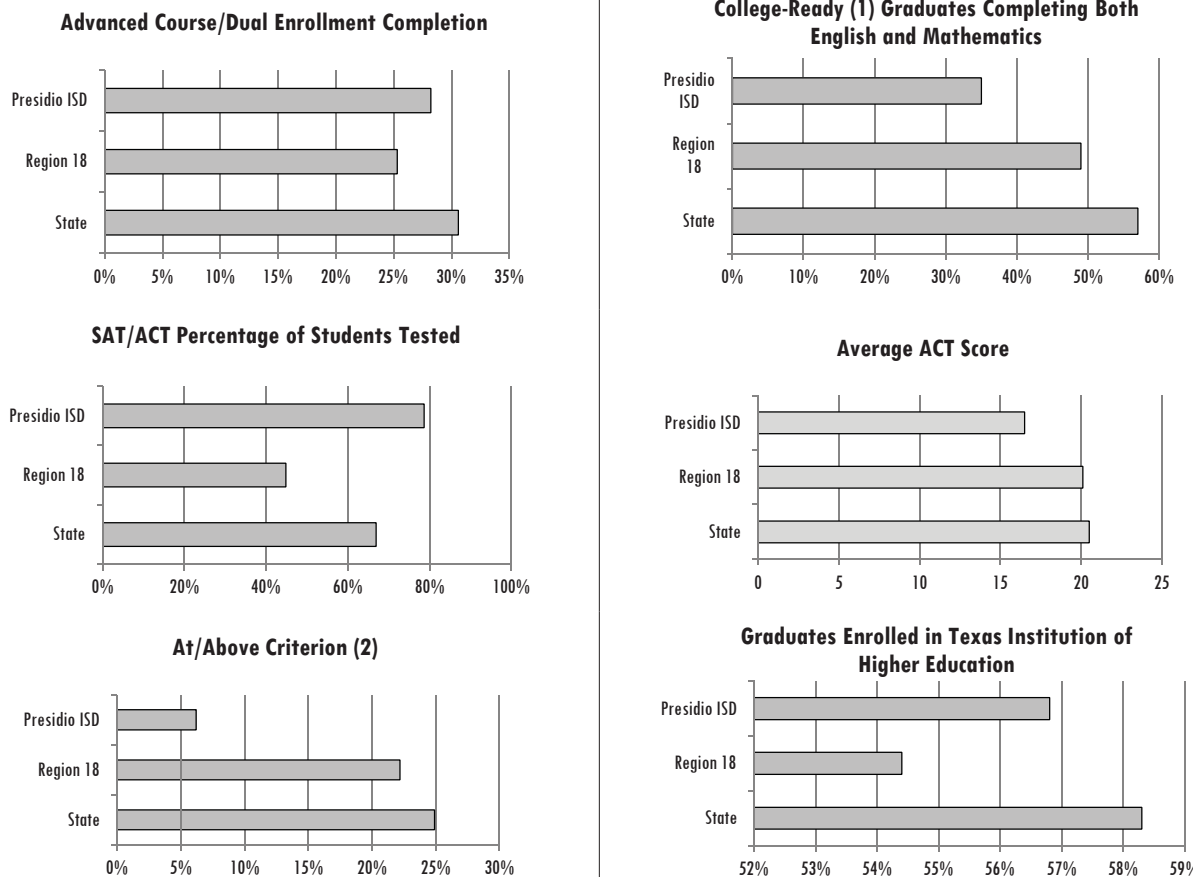
In 2012, Presidio ISD’s property wealth per weighted average daily attendance (WADA) was \$47,688. This amount placed the district below, and thus not subject to, the state’s primary

**FIGURE 1
PRESIDIO ISD STATE ACCOUNTABILITY RATINGS, SCHOOL YEARS 2008–09 TO 2012–13**

YEAR	DISTRICT	PRESIDIO HIGH SCHOOL	LUCI REDE FRANCO MIDDLE SCHOOL	PRESIDIO ELEMENTARY SCHOOL	ASSESSMENT INSTRUMENT
2008–09	Recognized	Recognized	Acceptable	Acceptable	TAKS
2009–10	Recognized	Recognized	Recognized	Recognized	TAKS
2010–11	Acceptable	Acceptable	Acceptable	Recognized	TAKS
2011–12	None	None	None	None	STAAR
2012–13	Met Standard	Met Standard	Met Standard	Met Standard	STAAR

NOTE: Accountability ratings were not issued in school year 2011–12 with the implementation of new state assessments. Acceptable = Academically Acceptable; Unacceptable = Academically Unacceptable
 TAKS = Texas Assessment of Knowledge and Skills; STAAR = State of Texas Assessments of Academic Readiness
 SOURCES: Texas Education Agency, Academic Excellence Indicator System Report, school years 2008–09 to 2011–12; Texas Academic Performance Report, school year 2012–13.

**FIGURE 2
PRESIDIO ISD
DISTRICT STUDENT ACADEMIC MEASURES COMPARED TO REGION 18 AND STATE, SCHOOL YEAR 2012–13**



NOTES:
 (1) To be considered college-ready, a graduate must have met or exceeded the college-ready criteria on the TAKS exit-level test, or the SAT or ACT test.
 (2) Criterion refers to the scores on the SAT and ACT college admissions tests, the AP and IB tests, and the College-Ready Graduates indicator. For college admissions tests, the criterion scores are at least 24 on the ACT (composite) and at least 1110 on the SAT (total). For AP and IB tests, the criterion scores are at least 3 on AP tests, and at least 4 on IB tests.
 SOURCE: Texas Education Agency, Texas Academic Performance Report 2012–13.

equalized wealth level (EWL) of \$476,500. If a district exceeds this threshold, the state “recaptures” a portion of wealthy school districts’ local tax revenue 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 above \$1.00.

In fiscal year 2012, Presidio ISD’s total actual expenditures were approximately \$24.5 million. Presidio ISD’s per pupil actual operating expenditures in fiscal year 2012 was \$12,090 compared to the state average of \$8,276. In fiscal year 2012, Presidio ISD spent approximately 53 percent of total actual operating expenditures on instruction compared to the state average of approximately 58 percent. The instructional expenditures percentage was calculated using the district’s total actual operating expenditures that funded direct instructional activities including 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).

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.

DEVELOP PLANS

Developing effective plans for all functional areas of the district, including educational, financial and operational, is critical to the district’s success. Implementing recommendations in these areas will enable the district to better target its efforts and resources and meet district goals.

Presidio ISD lacks a long-term strategic plan to ensure direction for programmatic and operational needs. The 2012–2014 district improvement plan meets state and local requirements, but Presidio ISD lacks a comprehensive, multi-year, board-approved strategic approach that prioritizes future instructional and operational needs. With an established and comprehensive strategic planning process,

the district could better articulate its future direction based on consensus of long-term needs, use of resources, and stakeholder goals.

Presidio ISD also lacks a process for leadership succession planning. While there has been consistency in leadership at the elementary school, the high school has experienced high principal turnover with four principals in the last five years. The district does not have a process for identifying and training a pool of candidates with skill sets that would allow them to accept the responsibility of top leadership positions in the district or campus administration. Establishing an intentional process to identify potential leaders would better prepare the district to retain qualified leaders who understand the students and the community.

In addition, Presidio ISD lacks a budgeting process that includes all stakeholders and incorporates district/campus goals and improvement plans. Campus principals consistently reported that they were aware of an overall budget but did not have input into budget details. The current district budgeting process relies heavily on district administration priorities and decisions. Principals are given considerable responsibility for student academic performance yet are given limited control of resources needed to realize improvements. Involvement of the campus and districtwide improvement teams and their decisions regarding personnel, programs, and the budget could be well-documented and reported to the Presidio ISD Board of Trustees and administration.

Presidio ISD does not have a board-approved comprehensive curriculum management plan with written operating procedures that outlines the process for curriculum review and revision. The district uses a district-established curriculum. Before establishing this curriculum, the district purchased a curriculum, which district staff stated that they were not able to fully implement due to lack of training. The only individuals who could provide a detailed description of the process and who handled curriculum revisions were the superintendent and the curriculum/special programs/federal programs director. A curriculum plan articulates the expectations to all stakeholders and provides the framework to determine what content will be taught, how the content will be taught, and how students will be assessed and the level to which students must perform.

Presidio ISD also lacks a comprehensive, stakeholder-driven educational facilities master plan. The district hired an architectural firm to develop a facilities planning model that

included a review of existing district facilities and plans for expansion. However, the resulting plan was not comprehensive and was limited to a theoretical overview of the physical capabilities and constraints of each school. Maintenance staff members were not aware of a formal facilities review process and they were not asked to give input into the facilities planning model or any recent capital improvement projects in the district. Without a comprehensive facilities master plan based on needs assessment and staff input, the district is unable to ensure that school district resources are directed to meeting the highest priorities. This may result in underutilized schools, increased operating costs, and the lack of ability to schedule and budget funds to properly maintain and enhance its facilities.

Recommendations to assist in developing plans include:

- Develop a three- to five- year strategic plan to guide district direction for programmatic, financial, and operational functions.
- Develop a plan to design and implement a succession planning process for district leadership.
- Establish a budget development process that starts with stakeholder input on district goals, considers input from campus leadership and staff, and ultimately gives authority to those responsible.
- Develop and implement a comprehensive curriculum management plan.
- Develop a comprehensive, stakeholder-driven educational facilities master plan.

MAXIMIZE PERSONNEL MANAGEMENT

Maximizing personnel management includes an assurance that the appropriate number, type and placement of personnel have been established. These recommendations offer opportunities for Presidio ISD to enhance its personnel function.

Presidio ISD's organizational reporting structure of personnel does not promote efficiency and effectiveness. The superintendent reports to the board and oversees the management of the district's daily operations, and supervises and evaluates 16 direct reports in nine independent functions, including both the administrative assistant and the data clerk/receptionist. The superintendent's informal organization of the direct reports into three levels of leadership has not been consistently implemented. Adjusting the current reporting structure to include the creation of two

new executive director positions—one for academic services and one for operations and business services—would maximize the superintendent's available time for planning and strategic leadership to ensure student success.

In addition, Presidio ISD has not centralized the administration of the food services program, including financial management, food production, training and staff development, and compliance. The district's business manager devotes approximately 9 percent of her time performing some of the duties of a food services director, including placing food orders and preparing the budget. Each of the three cafeteria managers make individual decisions on program operations for the cafeteria that they oversee. Centralized management of the food service program would better maximize staff resources and help ensure consistent quality throughout the district.

Presidio ISD human resources functions are also not efficiently, effectively, and consistently managed. In addition, the functions lack written procedures to ensure compliance with legal requirements and district policies. The structure for overseeing the human resources function does not maximize the role of each position. The superintendent informally oversees the primary human resources functions, with the assistance of the administrative assistant and the youth program coordinator. Without diligent oversight, training, and written procedures to guide consistent practice, the district risks penalties for non-compliance. For example, the district was not using some correct HR-related forms and was not using the required nondiscrimination statement in its hiring documentation. Establishing HR operations with effective oversight, management, and written procedures would help ensure a cohesive and reliable HR function.

Recommendations to assist in maximizing personnel management include the following:

- Decrease the number of direct reports to the superintendent to promote academic and operational efficiency
- Create an administrative position, food services director, reporting to the business manager.
- Assign management of human resources responsibilities to a central office administrator who should attend human resources training, develop written procedures, and supervise human resources functions.

ENSURE COMPLIANCE

Ensuring compliance with state and federal laws, as well as district policy, is a key management oversight responsibility. The review identified numerous areas where increased oversight to ensure compliance by the district is warranted.

Presidio ISD does not have adequate controls for salary advances to ensure funds are repaid and that the program complies with the Texas Constitution. Presidio ISD issues salary advances without a written policy. Initially, staff reported that salary advances of \$500 were available to new employees upon request at the beginning of the school year, but the program has evolved so that funds are available any time to any employee, and the amount is not capped at \$500. Presidio ISD has made 30 payroll advances ranging from a low of \$125 to a high of \$10,000. The district advanced more than \$63,000 from fiscal years 2009 to 2012, with only two advances made to new employees. Pursuant to the Texas Constitution, Article III, Section 52(a), the Legislature may not authorize a political corporation, including a school district, to grant public money to an individual unless the money is used to carry out a public purpose. Presidio ISD's practice of advancing public money to its employees without prior board approval and written policies to ascertain if the advances accomplish a public purpose may not comply with constitutional requirements.

Additionally, as required by statute, Presidio ISD lacks a comprehensive technology planning process, including a needs assessment. Without this process and assessment, the district risks being ineligible for federal funds. During the onsite review, the district had not submitted a current Long-range Technology Plan (LRTP) to TEA. The district's 2010–13 technology plan and TEA's plan approval were both expired. The district's eligibility for the Universal Service Administrative Corporation (USAC) Schools and Libraries Program, commonly known as E-Rate, is dependent on the submission of a technology plan. In December 2013, Presidio ISD submitted five E-Rate funding applications for July 2014 through June 2015 that were not based on a current technology plan, making some of these applications noncompliant with statutory requirements.

Presidio ISD lacks a methodology to ensure regular completion of its safety and security audit, risking noncompliance with the law to have a current audit submitted to the Texas School Safety Center (TxSSC). The district also lacks proper emergency preparedness, including noncompliance with the requirement to submit documentation regarding completion of bus emergency

evacuation drills to the Texas Department of Public Safety. During the onsite review, the district's June/July 2011 safety and security audit was not complete, and a District Audit Report (DAR) was not available. The audit was in the original template format, with little site-specific information provided on assessment and risk factors. The current three-year safety and security audit cycle is entering its final year. The Texas Education Code requires audits to be completed by August 2014, and results submitted to TxSSC by September 2014.

District staff lacks an understanding of emergency operations plan (EOP) procedures, were not familiar with their role in the plan, and have not been trained on the district's Emergency Response Checklist. The district has not met the recommended frequency for EOP preparedness drills. With increased attention to safety and security, district staff may be more prepared to respond appropriately in actual emergencies.

Presidio ISD does not perform bus emergency evacuation drills as required by the Texas Education Code. The Transportation Department has no records to show completion of student emergency evacuation drills from school buses. Drills provide practice and knowledge so that students know what to do in the event of a school bus emergency, including where to evacuate, proper operation of the exits, and what to do in the case of driver incapacitation.

Presidio ISD school bus mechanics do not hold proper licenses to operate a Class B commercial vehicle, despite the job description's requirement of this license. The district's mechanics currently hold a Class C license that only allows the operation of automobiles and pickups. However, since the mechanics test drive the school buses on public roadways, they are not in compliance with the Texas Department of Public Safety's commercial driver's license law.

Presidio ISD has not effectively implemented the Offer versus Serve (OVS) provision, risking noncompliance with the School Breakfast Program (SBP) and National School Lunch Program (NSLP) in all district schools at all age/grade levels. Although OVS allows students to decline some of the food offered in a reimbursable breakfast or lunch, the OVS goals are to reduce food waste and to permit students to choose only the foods they want to eat. The district allows students to refuse foods; however, students appear to be selecting and discarding foods rather than taking only those foods they intend to eat. As a result, much of the food in the cafeterias was discarded. OVS requires education of both staff and students to be able to execute it correctly. Staff should be able to recognize whether a student has a

reimbursable meal and students should not take any non-required food that they do not intend to consume.

Presidio High School claimed reimbursement for breakfasts that may not be consistent with meal pattern requirements as served. One of the breakfasts served during the onsite review, a breakfast parfait, was supposed to yield a 10 fluid ounce serving. However, this item was being served in a six-fluid-ounce bowl, which falls short of the proper serving size. If a breakfast does not meet federal requirements, it could cause a reclaim of federal reimbursement. By reviewing recipes to ensure they are consistent with federal program requirements, noting proper serving sizes, and consistently executing the recipes as written, the district can ensure compliance and also ensure that all students are receiving a breakfast that is the proper size and contains the proper components.

Presidio ISD did not secure approval from the Texas Department of Agriculture (TDA) for an alternate Point-of-Service (POS) collection method used for counting and claiming breakfasts served in the classrooms in grades pre-K–2. Without approval from TDA, the district risks noncompliance with the federal child nutrition program. Unless approved by TDA, child nutrition program guideline is that breakfast is served in the cafeteria, but pre-K–2 Presidio ISD students are served breakfast in the classroom, not in the cafeteria. In addition, there were no uniform procedures followed in the classrooms, as some teachers allowed students to choose what breakfast items they wanted while others gave each child a breakfast with all items included. Meals claimed using an inaccurate procedure for counting and claiming may be subject to a reclaim of federal reimbursement. The collection method used for counting reimbursable meals must be taken at the POS, approved by TDA, included in the district's policy statement and implemented as written.

Finally, Presidio ISD lacks established procedures to manage personnel records, and records are not centrally located, organized, or managed in compliance with legal requirements. In a random sample of personnel files located in both the superintendent's and business offices, the review team found that federal- and state-required documents were not consistently included in either the personnel file or the payroll clerk's binders and that records were not organized in any particular order. Additionally, the district does not have standard operating procedures for the collection of documents or checklists that define which records belong in the personnel file as defined by federal and state statute.

Maintaining the personnel records in a central location in a consistently organized structure will allow the district to ensure compliance with both federal and state law.

Recommendations to assist in ensuring compliance include the following:

- Discontinue making salary advances, determine the current outstanding balance of each loan, and immediately collect all outstanding salary advances.
- Develop a technology planning process including a formal needs assessment.
- Establish a process to conduct its safety and security audit every three years as required and ensure staff understanding of the Emergency Operation Plan.
- Develop emergency evacuation procedures and drills to ensure passenger safety in the event of an emergency, and perform as required in statute.
- Upgrade the licenses of school bus mechanics to comply with commercial driver license law.
- Implement the Offer versus Serve (OVS) provision effectively for breakfast and lunch in all grade levels in all district schools.
- Ensure that each of the required items offered as part of a reimbursable meal contributes sufficient amounts to meet the requirements of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal patterns.
- Develop and submit for approval to the Texas Department of Agriculture (TDA) a revised Policy Statement for Free and Reduced-Price Meals – Attachment B: Meal Count/Collection Procedure(s) for breakfast-in-the-classroom served at the elementary school, grades pre-K–2.
- Assign personnel records management responsibilities to the superintendent's administrative assistant so that all personnel records are centrally located and consistently organized and to ensure that records adhere to state and federal rules and laws.

ESTABLISH EFFICIENCIES

Establishing efficiencies in Presidio ISD would help increase the productivity of its employees. There are many opportunities for the district to maximize and improve its systems and processes.

Presidio ISD does not have adequate internal controls over its vendor master file (VMF). The district does not have a written policy or procedures regarding who has access to the VMF, data entry requirements to ensure consistency, or requirements to periodically review and update it. As a result, the VMF is not periodically checked and contains more than 3,400 vendors, some with duplicate entries for the same vendor, resulting in inefficiencies in the maintenance of its VMF. Misappropriation of assets could occur when multiple vendor names and addresses are used for the same vendor. Legitimate invoices could be paid multiple times to the same vendor but named as different listings in the VMF.

Presidio ISD is not maximizing the use of available technology to process payroll, which increases staff time and the risk for errors. The district's system to log employee overtime is not integrated with its accounting system. Weekly timesheets for employees who work more than 40 hours are manually completed and submitted for approval, and then are sent to the Business Office for processing. Additionally, the payroll clerk manually calculates overtime pay. Processing payroll information manually using data maintained in different systems is an inefficient use of resources. The process is time-consuming in all phases, including preparation, review, and recording transactions. The risk of errors decreases when calculations are not performed manually.

In addition, Presidio ISD has not maximized the use of cash management tools and techniques to efficiently monitor and manage cash and increase interest investment earnings. Instead of using available online banking, each day a Business Office representative travels to the local bank and obtains the account balances for all seven district accounts, an inefficient daily activity for staff. Fund transfers between Presidio ISD bank accounts are performed by the Business Office by writing a check to the specific fund or executing transfers at the bank. By using the online banking services available to the district, the district has an opportunity to increase employee productivity, and streamline the use of both cash monitoring processes as well as other cash management tools.

Presidio ISD has also not fully implemented available technology, making the purchasing process inefficient. Procedures have not been updated to fully implement and maximize the electronic purchasing system. The district migrated from a manual paper requisition process to the Electronic Requisition module in its accounting system to issue Purchase Orders (POs). However, the Business Office still requires hardcopy purchase requisition supporting documentation to be submitted before issuing a PO.

The district participates in five purchasing cooperatives, but the links to the vendor catalogs are not on the district's website. Each year, the Business Office compiles and distributes a binder of vendor catalogs to each campus for employees to use. These inefficiencies could delay the procurement process.

Presidio ISD also does not use its work-order system effectively or efficiently. The district's Maintenance Department purchased a newer work-order system that would track maintenance of building assets, transportation assets, and corrective work orders. This was done with the intention of replacing an older, outdated system. However, during the onsite review, both systems were still being used, with the older system still being used to keep track of the corrective work orders. Presidio ISD has also not trained backup staff to maintain the system. Partial and inefficient use of the automated work-order system forces staff to rely on manual processes that are time consuming and error prone. Fully transitioning from the older system and use only the newer system and training all staff to use the new system should result in increased efficiencies.

Presidio ISD does not have adequate policies and procedures to properly record, monitor, and dispose of fixed assets. Fixed assets are not consistently tagged upon acquisition. The district inefficiently uses three separate lists to track fixed assets, including a Technology Inventory listing, Room Inventory listing and Inventory Assets listing. However, the lists are not reconciled on a periodic basis. In addition, upon disposition, Presidio ISD does not consistently remove the district's name from the fixed assets. The district appears to have basic elements needed to capture and report fixed assets, such as a centralized receiving process, and defined responsibilities to tag and record the assets in the system. Maintaining accurate and complete information is essential to ensure accountability of the district's fixed assets.

Presidio ISD rents district-owned housing units to professional employees without written policy or procedures. The district owns three houses and 40 apartments that it leases to administrators and teachers. With no policies, inefficiencies occur with how the district manages its rental assets. The Presidio ISD Board of Trustees determines the rental rates for the district-owned housing, and the district has written leases on all the properties. However, the written policies that are lacking include, for example, the determination of which central office administrators are eligible to rent a district-owned home, which teachers are eligible to rent apartments, as well as a timeline and

procedures to guide the school board to determine and review the rental rates in relation to the market rate. Improved oversight of the management of the district’s houses and apartments could reduce the risk of allegations of disparate or preferential treatment of certain professional employees and improve the efficiency of decision-making related to housing.

Recommendations to assist in establishing efficiencies include the following:

- Establish adequate internal controls for the vendor master file and eliminate duplicate vendor listings.
- Maximize the use of technology in the area of payroll, and ensure Business Office personnel are adequately trained.
- Use the online banking services currently offered by the district’s depository, and seek other cash management services to monitor and manage cash efficiently and maximize earnings on idle cash balances.
- Update purchasing procedures to fully implement the electronic procurement process by approving purchase requisitions using electronic support, eliminating the distribution of hardcopy vendor catalogs and POs, and making links to the cooperative vendor catalogs on the district website.
- Use the automated work-order system to its capacity.
- Update district policies and procedures to require an annual reconciliation of all asset listings, capture fixed asset elements needed for financial reporting, and remove the district’s name from disposed assets.
- Assign an administrator the responsibility of writing local policy and procedures to guide the process of determining eligibility/allocation criteria and pricing of district rental units.

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 impact chart listing the chapter’s recommendations and associated savings or costs for school years 2014–15 through 2018–19.

The following figure summarizes the fiscal impacts of all 60 recommendations in the performance review.

FISCAL IMPACT

	2014–15	2015–16	2016–17	2017–18	2018–19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
Gross Savings	\$229,983	\$229,983	\$229,983	\$229,983	\$229,983	\$1,149,915	\$0
Gross Costs	(\$98,979)	(\$98,454)	(\$99,354)	(\$98,454)	(\$95,354)	(\$490,595)	(\$20,785)
TOTAL	\$131,004	\$131,529	\$130,629	\$131,529	\$134,629	\$659,320	(\$20,785)

CHAPTER 1
DISTRICT LEADERSHIP,
ORGANIZATION, AND
MANAGEMENT

PRESIDIO INDEPENDENT SCHOOL DISTRICT

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. Each school district in Texas is governed by an elected seven-member board of trustees (board). 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 staff levels, and allocating the resources to implement district priorities. The board and superintendent collaborate as a leadership team to meet district stakeholder needs.

Figure 1–1 lists the current members of the Presidio Independent School District (ISD) Board of Trustees. There were four members elected during the May 2013 election, one incumbent was re-elected and three new members were elected. This election significantly changed the level of experience of the board as a team and created a need for purposeful and focused school board training to ensure the superintendent and all board members could effectively and efficiently provide the foundation to educate students.

Presidio ISD includes three campuses: Presidio Elementary School, grades pre-kindergarten (pre-K) to 6; Franco Middle School, grades 7 to 9; and Presidio High School, grades 10 to 12. The district also operates an Early College High School (ECHS) within the high school structure that serves some grade 9 students. Grade 9 students in the ECHS program attend classes at the Presidio High School campus.

Presidio Elementary School is staffed with one principal for grades pre-K to 2 and a second principal for grades 3 to 6. Franco Middle School and Presidio High School each have a principal, and the high school also has an assistant principal. The ECHS has a principal position that is currently staffed by a consultant. This consultant is not under contract, but is at the campus several days a week and is paid a daily rate of \$500 per day. The average daily rate for the district's five principals is approximately \$340 per day. All of the principals, including the ECHS consultant, report directly to the superintendent.

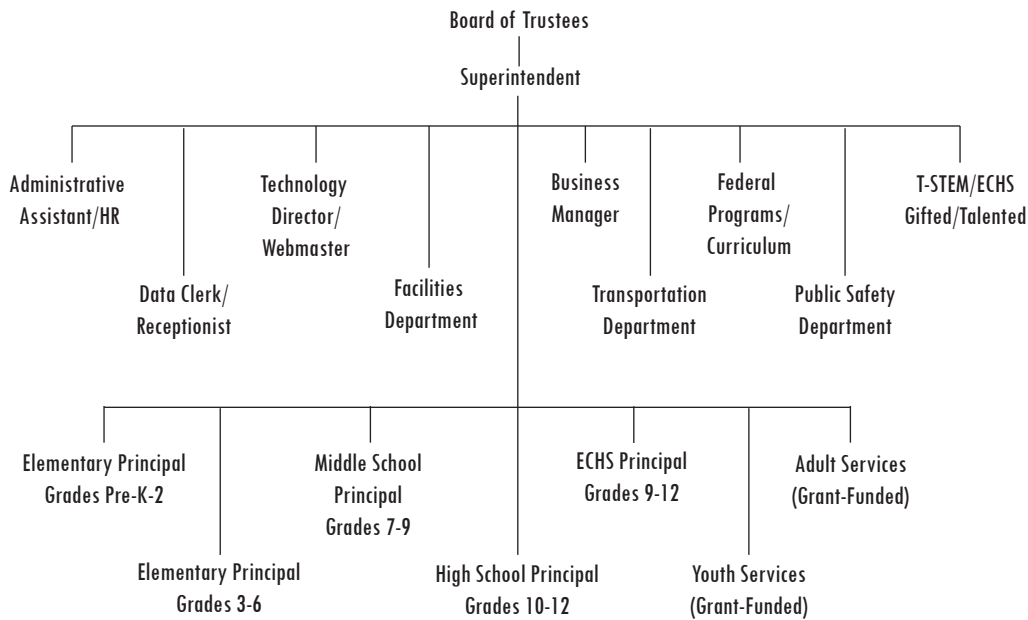
**FIGURE 1–1
PRESIDIO ISD BOARD OF TRUSTEES
SCHOOL YEAR 2013–14**

OFFICE	NAME	PROFESSION	ELECTED	TERM EXPIRES
President	Alfred P. Muniz	Retired	2013	2017
Vice President	Ethel Barriga	First Presidio Bank	2011	2015
Secretary	Velva Saenz	Harper Hardware	2013	2017
Member	Helio Franco	U.S. Border Patrol	2013	2017
Member	Aureliano Ramirez	Ponchos Pizza	2011	2015
Member	Hugo Ramos	CBP Housing Asst. Manager	2011	2015
Member	Carlos Nieto	Ponchos Pizza	2013	2017

SOURCE: Presidio ISD Administration, March 2013.

In addition, 11 central office staff members also report directly to the superintendent. This staff includes the clerical positions of the administrative assistant to the superintendent and the data clerk/receptionist. **Figure 1–2** shows the district's organizational structure. In addition to clerical duties, the administrative assistant is responsible for many human resource services. Other direct reports include the technology director, who is responsible for managing all aspects of the district's technology both instructional and operational. The business manager oversees all financial functions including benefits, budget, payroll, and salary schedules. The federal programs/curriculum director and the Texas Science, Technology, Engineering, and Mathematics Initiatives (T-STEM)/ECHS director also report to the superintendent and manage all special programs, regular curriculum, and testing and accountability. In addition, there are directors of Transportation, Public Safety, Facilities, and two grant-funded staff members who manage adult and youth services for the district.

**FIGURE 1–2
PRESIDIO ISD ORGANIZATIONAL CHART
SCHOOL YEAR 2013–14**



SOURCE: Presidio ISD Administration, November 2013.

FINDINGS

- ◆ The separate roles and responsibilities of the Presidio ISD board and the superintendent are not clearly understood.
- ◆ Presidio ISD lacks a process for ensuring prior board approval for board travel and equitable use of board travel funds.
- ◆ Presidio ISD’s organizational reporting structure does not promote efficiency and effectiveness.
- ◆ Presidio ISD lacks a long-term strategic plan to ensure direction for programmatic and operational needs.
- ◆ Presidio ISD lacks a process for leadership succession planning.
- ◆ Presidio ISD lacks a staffing allocation model for the assignment of campus leaders.
- ◆ Presidio ISD lacks a process for creating and maintaining districtwide administrative procedures manuals.

RECOMMENDATIONS

- ◆ **Recommendation 1:** Develop and implement a training plan focused on the differentiated roles and responsibilities of the board and superintendent.
- ◆ **Recommendation 2:** Establish procedures governing board travel.
- ◆ **Recommendation 3:** Decrease the number of direct reports to the superintendent to promote academic and operational efficiency.
- ◆ **Recommendation 4:** Develop a three- to five-year strategic plan to guide district direction for programmatic, financial, and operational functions.
- ◆ **Recommendation 5:** Develop a plan to design and implement a succession planning process for district leadership.
- ◆ **Recommendation 6:** Design an annual process to review individual categories of leadership staffing based on district needs.
- ◆ **Recommendation 7:** Develop and publish an electronic district administrative procedures manual.

DETAILED FINDINGS

BOARD TRAINING (REC. 1)

The separate roles and responsibilities of the Presidio ISD board and the superintendent are not clearly understood.

Although board policies specify the role of the board, the role of board members, and the superintendent as required by the Texas Education Code (TEC) and the Texas Administrative Code (TAC), all board members have not been trained in this area. During interviews with board members, several indicated that they were unsure of their individual roles versus the role of the superintendent and stated that role and responsibility training would help them to feel more competent as board members.

A review of board training records maintained by the Texas Association of School Boards (TASB) indicates that the majority of Presidio ISD board members have attended either the Texas Association of School Administrators (TASA)/TASB conference, held in the fall, or the TASB Summer Leadership Training offered each year. The May 2013 election added three new school board members to the Presidio ISD superintendent/board leadership team. However, the board and the superintendent, as the district's leadership team, have not jointly attended a team-based session focused on the roles and responsibilities of board members and the superintendent. Several trainings related to team building are required by the TEC, including the Assessment of Continuing Education Needs of the Board-Superintendent Team and the State Board of Education-approved Framework for School Board Development. The superintendent and some board members reported that the district contracted with a consultant to conduct an annual summer team-building activity to collaboratively plan and review the annual budget. While these trainings may help build effective working relationships, they do not specifically address the different responsibilities of the superintendent and board.

TEC, Section 11.201(a), states that the "superintendent shall be the educational leader and chief executive officer of the district" and outlines specific duties of the superintendent in TEC, Section 11.201(d), including "assuming administrative responsibility and leadership for the planning, organization, operation, supervision, and evaluation of the education programs, services, and facilities of the district and for the annual performance appraisal of the district's staff." TEC Section 11.151(b) outlines the role of the school board and states that the board as a "body corporate" shall "govern and

oversee the management of the public schools of the district." TEC Section 11.151 further states that "the Board may act only by majority vote of the members present at a meeting held in compliance with Government Code Chapter 551, at which a quorum of the Board is present and voting. Unless authorized by the Board, a member of the Board may not, individually, act on behalf of the Board."

The *Presidio ISD Board of Trustees Standard Operating Procedures* manual provides the following additional guidance:

- No board member or officer has authority outside the board meeting.
- No board member can direct employees in regard to performance of their duties.

In summary, these documents indicate that the superintendent is responsible for managing the day-to-day operation of the district, and the board is responsible for overseeing that management. Without a clear understanding of the differentiation of these two separate functions, however, board members can unknowingly act outside their legal role. Data indicated that, in particular, the board's role with regard to interactions with contractors such as the school attorney, tax attorneys, and architects, for example, have not been clearly understood by all board members.

For example, travel request vouchers submitted by board members from September 2012 to August 2013 include multiple travel expenditures for one or more board members to travel to cities outside of the region to meet with professional contracted service representatives. Travel included multiple trips to El Paso and Austin (one to three days per trip). The purposes of various trips included meeting with the school district attorney and the school district engineering consultant or for meetings or trainings at The Equity Center and other organizations. While the superintendent reported that it was financially beneficial that only one person travel for this type of business, there was no indication of an understanding that this was an administrative role and not the role of an individual board member. As stated in Board Policy BAA (LEGAL) and the Presidio ISD Board of Trustees Standard Operating Procedures, board members have no official authority outside of their roles as a member of the group during a formal board meeting.

The travel requests indicate that they were made in advance, approved by the superintendent, and, according to the superintendent, ultimately reported to the board. Interviews with the superintendent and a board member indicated a

commonly held perception that if a board member had professional experience and skills related to the purpose of the trip, he/she was the most appropriate individual to make the trip. This type of continued confusion about the specific roles of the board members and the superintendent can create a situation where board members assume administrative roles outside of their legal responsibilities.

TASB's *Effective Board Practices: An Inventory for School Boards* states: "clearly defining and respecting the differences between the board's and superintendent's roles are crucial to avoiding misunderstandings, inefficiency, and possible conflict between the board and superintendent." Texas statute assigns the board the task of "overseeing the management of the district" and the task of "managing the district" is assigned to the superintendent. According to the TASB document, which is based on TEC Section 11.201(a) and TEC Section 11.151, management of the district refers to the following activities:

- putting plans, procedures, programs, and systems in place to achieve a clearly defined desired result;
- monitoring those plans, procedures, programs, and systems against appropriate benchmarks or measures of effectiveness; and
- changing the plans and procedures as circumstances change and/or if implemented activities are not proving successful in achieving the desired result.

Accordingly, oversight of management consists of the following activities:

- making sure there are clearly defined, desired results in place for the major areas of responsibility under management;
- making sure that the clearly defined, desired results of management are appropriate; and
- making sure that plans, procedures, programs, or systems are in place, that they are monitored, and that they are changed, if necessary.

The TASB report also says that understanding the difference between these two functions is "absolutely essential."

Many school districts in Texas include board roles and responsibilities as a part of the mandatory team-building training. This training is required annually and may be facilitated by an Education Service Center or any Texas Education Agency (TEA) approved board trainer. Nixon–Smiley Consolidated Independent School District, a similar-

sized school district located in Gonzales County, annually designs its required Team-Building/Assessment of Continuing Education Needs of the Board-Superintendent Team training around roles and responsibilities. The district contracts with Regional Education Service Center XIII (Region 13) to conduct the session and to facilitate the assessment of continuing education needs. Based on the results of the assessment, the district plans board training sessions for the following year.

Presidio ISD should develop and implement a training plan focused on the differentiated roles and responsibilities of the board and superintendent.

The Presidio ISD superintendent should plan a series of workshops, as a part of the current TEC required board training, facilitated by an independent, out-of-district facilitator, who is not otherwise currently under contract with the district, for an in-depth and collaborative study of the roles and responsibilities of both board members and the superintendent and an assessment of further board/superintendent training needs. The facilitator should be knowledgeable of the roles and responsibilities of a school superintendent and the board, and skilled in leading guided and purposeful collaborative conversation during the sessions. The district has set aside funding for board and superintendent training(s) in its annual budget. TASB provides a free assessment inventory for determining board training needs on its website along with a resource for reviewing the results of the assessment and outlining needs. The superintendent should develop a training calendar that identifies dates, topics (based on results of the assessment), and knowledgeable facilitators. All board members should attend all of the training sessions.

This recommendation could be implemented with existing resources.

Since the time of the onsite review, the district reported that board team building training is traditionally conducted during the summer months. By August 2014, the board will have attended two days of training on roles and responsibilities as sponsored by TASB and Regional Education Service Center XVIII (Region 18). In addition, the board plans to review, update, and revise all board policies, which will then be sent to TASB for review and comment.

BOARD TRAVEL (REC. 2)

Presidio ISD lacks a process for ensuring prior board approval for board travel and equitable use of board travel funds.

Presidio ISD Board Policies BBG (LEGAL) and BBG (LOCAL) provide guidance for board travel activities and include requirements for the following categories:

- travel planning;
- expense reimbursement;
- documentation required;
- specific expenses (airfare);
- ground transportation;
- meal expenses;
- hotels; and
- reimbursement restrictions.

BBG (LOCAL) specifies that:

“A trustee shall be reimbursed for allowable travel, meals, and lodging expenses incurred in carrying out Board business; however, no reimbursement shall be made to a Board member unless the Board has given prior approval for the travel. The Superintendent and business office shall keep a detailed accounting of each Trustees’ expenses.”

A review of Presidio ISD travel request vouchers for board members indicates that travel requests are submitted to and approved by the superintendent; however, there is no evidence that the board approves travel on a regular basis. While the superintendent stated that travel is reported to the board at the monthly trustee meeting, the 2013 board minutes do not reflect that the board was presented with and approved board travel requests.

Presidio ISD board travel expenses were compared with similar data for a set of peer districts whose size, demographics, and geographic location closely align to Presidio ISD.

Identified peer districts are Santa Rosa, Tornillo, Monte Alto, and Muleshoe Independent School Districts. **Figure 1–3** shows Presidio ISD board travel and subsistence expenses over a five-year period with similar expenses of the four peer districts and the state average.

The amount and cost of Presidio ISD’s total board travel is not consistent with its peer districts and the state average. In addition, a review of the board travel of individual board members over a six-year period shows that there has not been equity in the amount spent among board members, as shown in **Figure 1–4**.

Board members A, C, and E served the entire six-year period, while the remaining board members served varying numbers of years. Board member A spent significantly more in board travel funds than any other member, accounting for more than half (59.6 percent) of total board travel expenditures over the six-year period.

The district’s local board policy was designed to ensure communication and collaboration related to board travel decisions. By not effectively implementing a travel approval process for board members, the district risks making poor budget planning decisions, potential disagreement about what constitutes appropriate travel, and perceptions of inequitable opportunities for individual board members to have access to funds for meeting required continuing education hours.

Board Policy BBG (LOCAL) addresses board member compensation and expenses and states that the “Board shall meet annually to discuss and determine the Board’s travel budget for the coming year and to discuss the types of training members shall attend.” However, the district’s Board of Trustees Standard Operating Procedures Manual does not

**FIGURE 1–3
BOARD TRAVEL EXPENSE COMPARISON
PRESIDIO ISD, PEER DISTRICTS, AND STATE AVERAGE, SCHOOL YEARS 2007–08 TO 2011–12**

DISTRICT	2007–08	2008–09	2009–10	2010–11	2011–12
Monte Alto ISD	\$16,843	\$28,886	\$26,880	\$25,588	\$22,273
Muleshoe ISD	\$8,046	\$7,485	\$2,931	\$6,103	\$ 5,544
Presidio ISD	\$29,321	\$42,273	\$54,804	\$49,054	\$46,268
Santa Rosa ISD	\$11,730	\$12,346	\$9,093	\$11,875	\$26,110
Tornillo ISD	\$21,043	\$13,811	\$7,586	\$10,458	\$6,461
State Average	\$11,201	\$12,327	\$12,135	\$12,707	\$10,327

SOURCE: Texas Association of Business Officials (Travel and Subsistence) for school years 2007–08 to 2011–12.

**FIGURE 1-4
PRESIDIO ISD BOARD TRAVEL REIMBURSEMENTS RECEIVED BY BOARD MEMBERS
SCHOOL YEARS 2007-08 TO 2012-13**

MEMBER	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13
A	\$8,607.98	\$12,062.77	\$24,112.74	\$21,894.68	\$25,884.96	\$19,530.44
B	\$2,294.12	\$2,188.49	\$4,452.19	\$3,341.28	\$3,523.38	*
C	\$891.57	*	\$47.36	\$884.41	\$588.60	\$563.07
D	\$2,470.41	\$1,999.04	\$2,410.53	\$354.08	*	\$1,138.03
E	\$2,390.91	\$3,350.43	\$5,927.41	\$4,510.34	\$5,054.91	\$3,225.48
F	\$3,423.34	\$3,933.38	*	*	*	*
G	\$1,189.03	\$2,604.18	\$1,891.00	*	*	*
H	*	*	\$661.56	\$1,429.94	\$3,853.35	\$2,023.07
I	*	*	\$295.00	\$189.00	\$588.60	*
J	*	*	*	*	\$588.60	\$1,086.41
K	*	*	*	*	*	\$612.42

* No data was reported for this board member for this year.

NOTE: These figures represent only board member reimbursements and do not include travel expenses paid directly by the school district.

SOURCE: Presidio ISD, Business Office, travel reimbursements provided to the School Review Team for school years 2007-08 to 2012-13.

include written procedures to ensure that a pre-planning board travel process exists.

The Illinois Association of School Boards (IASB) points out that one of the areas where school board members are most likely to put their reputations at risk includes the perception of abuse of travel expense policies. IASB offers the three following suggestions to guard against violation of policy or the appearance of a violation:

- keep a complete record of expenses while on school district business and be prepared to provide documentation;
- encourage the board to develop an understanding of reasonable expenditures that will be acceptable to the community; and
- when determining whether a particular expense should be reimbursed, ask if it was directly related to the trip and to the meeting.

Many school districts in the nation have comprehensive travel procedures for school board members. Stafford Municipal School District in Stafford, Texas has comprehensive board travel procedures that were updated in August 2012. The procedures open with the reminder that “every Stafford Municipal School District trustee assumes a responsibility to the taxpayers of Stafford to keep the cost of travel to a minimum.” The procedures provide guidelines in the following areas:

- limitations on out-of-state travel;
- pre-trip procedures;
- meal expenses;
- hotel/motel expenses;
- personal vehicle;
- air travel car rental;
- cash advance;
- miscellaneous;
- summary of local/federal reimbursement amounts; and
- post-trip procedures.

The procedures state that “deviations from the stated procedures can result in non-reimbursed expenses.”

Presidio ISD’s Board of Trustees should establish procedures governing board travel.

The board and superintendent should identify an out-of-district facilitator to lead a meeting or session to create procedures to guide board travel. The procedures should be incorporated into the board’s Standard Operating Procedures Manual. The district has set aside funding for board training(s) in its annual budget. The district would benefit

from this action if procedures are in place for the 2014–15 budget planning process.

This recommendation could be implemented with existing resources.

REPORTING STRUCTURES (REC. 3)

Presidio ISD’s organizational reporting structure does not promote efficiency and effectiveness.

Presidio ISD’s superintendent reports to the board and oversees the management of the district’s daily operations as outlined in Board Policy BJA (LEGAL) and BJA (LOCAL). As shown in **Figure 1–2**, the superintendent supervises and evaluates 16 direct reports, including both the administrative assistant and the data clerk/receptionist. This reporting structure assigns the superintendent direct supervisory responsibility for the Business Office, human resources, federal programs/curriculum, T-STEM initiatives, Gifted and Talented (G/T) programs, Transportation, Public Safety, Facilities, and adult and youth services. To facilitate communication, the superintendent, as illustrated in **Figure 1–5**, has informally organized the direct reports into three levels of leadership Administrative Team 1,

**FIGURE 1–5
PRESIDIO ISD ADMINISTRATIVE TEAMS
SCHOOL YEAR 2013–14**

ADMINISTRATIVE TEAM	STAFF POSITIONS INVOLVED
Administrative Team 1	Central Office staff Campus principals
Administrative Team 2	Central Office staff Campus principals Assistant principals Counselors Instructional department leaders
Administrative Team 3	Central Office staff Campus principals Assistant principals Counselors Instructional department leaders Maintenance Transportation Security Technology (Other staff invited by campus principals)

SOURCE: School Review Team, January 2014.

Administrative Team 2, and Administrative Team 3 and meets with staff in each level or a combination of levels at least once a week, usually on Tuesday afternoons. The superintendent and the federal programs/curriculum director collaboratively develop the agenda for these meetings and disseminate minutes and follow-up agenda items. In addition to these weekly meetings, data indicate that the superintendent engages in a high level of communication with staff via e-mail, texting, and telephone calls.

The current reporting structure does not allow Administrative Team 1, principals and central office staff, particularly the programmatic leaders of federal programs/curriculum, T-STEM, G/T and adult and youth services, to discuss issues on a regular basis. Given the breadth of the responsibilities of the superintendent, it is not practical or feasible for him to effectively supervise all 16 of the staff positions assigned to him. Consequently, staff reported that in practice, opportunities for Administrative Team 1 to meet were rare, and that the majority of all Tuesday meetings were with Administrative Team 2 and, to some extent, Administrative Team 3. As a result, senior district and campus administrators do not meet regularly for the purpose of overall planning and vertical curriculum alignment discussions. In addition, the current reporting structure requires the superintendent to spend a majority of his time managing staff, minimizing available time for planning and strategic leadership to ensure student success.

Span of control is an organizational term that refers to the number of staff a supervisor can effectively manage. The American Association of School Administrators states that superintendents once were considered successful if they could manage the “Bs” of district leadership - buildings, buses, books, budgets, and bonds. Today, however, the challenge has shifted to focus on the “Cs” of leadership - connection, communication, collaboration, community building, child advocacy, and curricular choices that lead to academic success of all children.

Managers with a wide span of control can become overloaded with work, have trouble making decisions, and lose touch with their subordinates and their overall responsibility for guiding the long-term direction of the organization. In an article appearing in the *Harvard Business Review*, Lyndall Urwick states that “top management has functions that they cannot possibly delegate completely,” and, for this reason, “one of the biggest tasks confronting the manager is that of reducing his overload of less important daily duties, thus giving himself time for reflection as well as for the personal

contacts with his organization that are the mainspring of leadership, and the ‘personal touch’ that makes the executive the business leader.” Urwick says that “a restricted span of control can improve executive effectiveness, reduce pressure, inefficiency and incompetence, produce better employee cooperation, and build morale and a sense of unity within the organization.” Research on this issue recommends three to six reports to a chief executive officer depending upon the size of the organization.

Presidio ISD should decrease the number of direct reports to the superintendent to promote academic and operational efficiency. The district should create an executive director of academic services position and an executive director of operations and business services position to supervise the positions currently reporting to the superintendent to provide more time for districtwide decision-making.

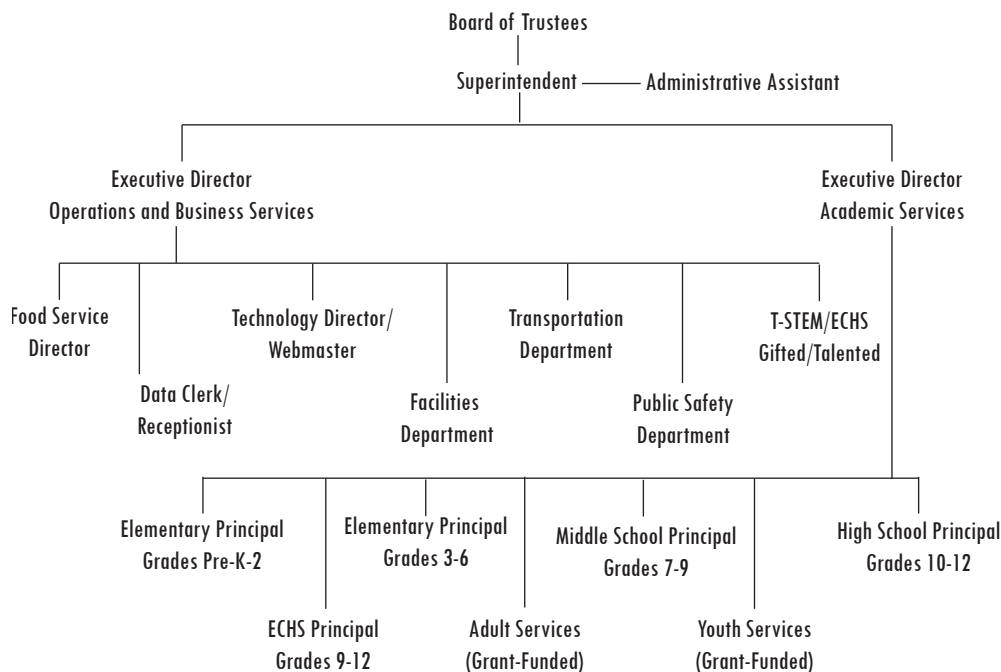
This structure would leave the administrative assistant reporting to the superintendent and elevate the current positions of business manager and director of federal programs/curriculum to executive director positions. The executive director of academic services would supervise the campus principals and the functional areas of technology,

federal programs/curriculum, T-STEM/ECHS, G/T, and youth and adult services. The executive director of operations and business services would supervise the data clerk/receptionist and the functional areas of benefits, budget, payroll and salary schedules as well as facilities, transportation and public safety.

Figure 1–6 shows a recommended organization for Presidio ISD that reduces the number of direct reports to the superintendent from 16 positions to three positions.

The recommended reporting structure combines functions to establish an Academic Services Department and an Operations and Business Services Department. Under this new structure, the positions currently reporting to the superintendent would report to one or the other of the new positions. In addition, this change would eliminate the position of federal programs/curriculum director and the business manager and would include the addition of a food service director as discussed in the Child Nutrition Services chapter of this review. This functional reporting structure would relieve the superintendent of day-to-day supervision duties of some staff and departments, but would provide for a high level of leadership for all functions.

**FIGURE 1–6
PROPOSED PRESIDIO ISD DISTRICT ORGANIZATION, JANUARY 2014**



NOTE: Food service director is a new recommended position.
SOURCE: Legislative Budget Board, School Review Team, January 2014.

The superintendent, along with Administrative Team 1, should revise the organizational structure of the district. The implementation of the new organizational structure should include the alignment of roles and responsibilities with position titles and be reflected in job descriptions and procedures manuals as appropriate. In addition, there should be a review of position salaries and adjustments based on added or deleted responsibilities.

The elimination of the business manager position (\$69,672) and the federal program/curriculum director position (\$80,785) would save \$150,457 (\$69,672 + \$80,785) in salaries and benefits from the budget. The addition of the executive director of academic services (salary of \$86,100 x 15 percent benefits) and the executive director of operations and business services (salary of \$86,100 x 15 percent benefits) would cost \$198,030 (\$99,015 + \$99,015). Therefore, the net fiscal impact of this recommendation would be an annual cost of \$47,573 (\$198,030 - \$150,457).

In a telephone conference with the Texas Association of School Boards (TASB) during the onsite review, the TASB director of Human Services explained that Presidio ISD is currently working with them to review and update the January 2012 TASB Staffing Review. As a part of that review, Presidio ISD will have access to the TASB Statewide Salary Survey Study and be provided information on market competitive salaries for similar sized districts for positions similar to the positions recommended in this finding. That information will be utilized to assign salaries to the new positions and the review will include the alignment of new roles and responsibilities with position titles. All changes will be reflected in job descriptions and procedures manuals as appropriate. Changes resulting from this recommended structure should be included in the school 2014–15 budget review process and implemented on September 1, 2014.

STRATEGIC PLANNING (REC. 4)

Presidio ISD lacks a long-term strategic plan to ensure direction for programmatic and operational needs.

Presidio ISD has a district improvement plan for 2012–2014. This plan is consistently reviewed and modified and has been developed following state, legal, and local requirements. A District Improvement Committee participates in the development and review of the plan, which is posted on the Presidio ISD website. The current plan was based on a comprehensive needs assessment and was originally approved on September 12, 2011, by the Presidio ISD Board of

Trustees. The plan was subsequently revised in October 2012 and August 2013.

The plan was designed around the following four focus areas and strategies:

- Student learning
 - Establish a process for supporting all learners in academics through appropriate interventions at the campus, classroom, and individual student levels;
 - Strengthen literacy in all classes;
 - Reinforce teacher/student engagement in SCA, course curriculum maps, lesson planning, and Professional Development and Appraisal System (PDAS); and
 - Develop and implement strategies to attract and retain high quality, highly qualified teachers and para-professionals.
- Quality learning and working environment
 - Address standard faculty and staff and parent satisfaction issues;
 - Establish a process for consistent implementation of student code of conduct;
 - Establish a process to ensure safe, quality learning and working environments; and
 - Establish a professional development system.
- Effective and efficient organization
 - Increase instructional time including, but not limited to, tutorials and enrichment;
 - Ensure all district stakeholders have access to effective and efficient support resources;
 - Ensure all students and staff have access to current, secure, and sustainable technology; and
 - Use Classroom Continuous Improvement to improve the school classroom systems.
- Parent and community engagement
 - Utilize parents, community organizations, businesses, and programs to increase student learning;

- Enhance customer service, particularly through welcoming environments, effective communication with the public, ongoing staff training and results monitoring, and more multi-language information;
- Develop a quality measurement system of community engagement; and
- Develop processes for transitioning students into the community.

Each focus area is addressed by a district goal, a district priority student learning target, and district strategies that include:

- student population addressed;
- staff responsible;
- timeline (implementation and formative evaluation);
- resources (human/materials);
- budget used; and
- evaluation measures (formative/summative).

While this plan meets state and local planning requirements, it lacks a comprehensive, multi-year board-approved strategic approach that prioritizes future instructional and operational needs. These needs include facilities, technology, and business operations. Without an established and comprehensive strategic planning process, a district cannot articulate its future direction based on consensus of long-term needs, use of resources, or stakeholder goals. A strategic plan should include all district functions, align with the district budget, and inform the district and campus improvement planning.

Many districts in Texas have a comprehensive district strategic planning process. The Balanced Scorecard Institute (BSI) defines strategic planning as an organizational management activity that is used to set priorities, focus energy and resources, strengthen operations, ensure that employees and other stakeholders are working toward common goals, establish agreement around intended outcomes/results, and assess and adjust the organization's direction in response to a changing environment. It is a disciplined effort that produces fundamental decisions and actions that shape and guide what an organization is, who it serves, what it does, and why it does it, with a focus on the future. Effective strategic planning articulates not only where an organization is going and the actions needed to make progress but also how it will know if it is successful. A

strategic plan is also a document used to communicate the organization's goals, the actions needed to achieve those goals, and all of the other critical elements developed during the planning exercise.

While there are many different frameworks and methodologies for strategic planning and management, there are no absolute rules regarding the right framework. Most frameworks follow a similar pattern and have common attributes. BSI suggests that the basic phases include:

- analysis or assessment, where an understanding of the current internal and external environments is developed;
- strategy formulation, where high level strategy is developed and a basic organization level strategic plan is documented;
- strategy execution, where the high level plan is translated into more operational planning and action items; and
- evaluation or sustainment/management phase, where ongoing refinement and evaluation of performance, culture, communications, data reporting, and other strategic management issues occur.

Additional framework designs can be obtained through the Association for Strategic Planning.

Lago Vista Independent School District, a 1,300-student, three-campus school district located in Travis County, conducted a strategic planning process in 2012. Consultants from Region 13 assisted with the planning and facilitation of the process, which included review of the district's vision and mission, a needs assessment structured around a Strengths, Weaknesses, Opportunities, and Threats (SWOT) activity, and the development of goals, objectives, strategies, timelines, and evaluations.

Presidio ISD should develop a three- to five- year strategic plan to guide district direction for programmatic, financial, and operational functions.

To begin, Administrative Team 2 should identify a strategic planning framework that fits the district's needs. Common implementation steps for a strategic planning process are sequential and could encompass the following activities and timeline:

- identify an out-of-district facilitator experienced in conducting strategic planning activities (early July 2014);

- conduct a workshop for the board and superintendent to identify the priority areas for the planning activities (early July 2014);
- identify a districtwide steering committee of stakeholders (early July 2014);
- determine the time and location for the steering committee meeting (mid-September 2014);
- determine the time and locations for steering committee updates for staff and community (early October 2014);
- identify an action writing team (early October 2014);
- determine the time and location for the action writing team meetings (late October 2014 to early February 2015);
- determine date and time of the final steering committee meeting to approve the strategic plan before board approval (mid-February 2015);
- post the strategic plan on the district's website (early March 2015);
- use the strategic plan annually as part of the district and campus improvement planning process (early March 2015); and
- integrate identified resource needs into the campus and district budgeting process immediately after board approval of the plan (mid-March 2015).

The district could implement this recommendation with a one-time cost for an external facilitator. Some regional education service centers provide this service for a flat fee of \$10,000 for a district the size of Presidio ISD. Other vendors provide similar services with varying fee structures.

SUCCESSION PLANNING (REC. 5)

Presidio ISD lacks a process for leadership succession planning.

District staff reported that the remote geographical location of Presidio ISD makes it difficult to recruit and retain qualified administrators.

While there has been consistency in leadership at the elementary school, the high school has experienced high principal turnover with four principals in the last five years. Staff reported that the district anticipated leadership vacancies at the ECHS, the Disciplinary Alternative

Education Program (DAEP), and the high school at the end of the 2013-14 school year. In addition, the middle school principal reported that he is just a few years away from retirement. The district does not have a process for identifying and training a pool of candidates with skill sets that would allow them to accept the responsibility of top leadership positions in district or campus administration.

Without an intentional process for identifying potential leaders and providing career development opportunities for current Presidio ISD employees, the district may continue to experience difficulties both in hiring and retaining qualified leaders who understand the community and district and who are committed to serving the students of the community. Jackie Wilson, director of professional training for School Leaders at the University of Delaware, states that “waiting for a hero or heroine to walk in the door is unrealistic and naïve. Neither is it wise to grab whoever is available. School districts need to plan in advance to fill positions when they open.” She further contends that hiring unqualified staff too often results in “a drain of financial and emotional resources.” While business and industry have long practiced succession planning to ensure sustained and successful leadership, school districts are only beginning to realize the benefits of this process.

Succession planning is the deliberate and systematic effort made by organizations to recruit, develop, and retain individuals with a range of leadership competencies capable of implementing current and future organizational goals. The U.S. Office of Personnel Management (OPM) describes a succession planning process as a systematic approach to:

- building a leadership pipeline/talent pool to ensure leadership continuity;
- developing potential successors in ways that best fit their strengths;
- identifying the best candidates for categories of positions; and
- concentrating resources on the talent development process and yielding a greater return on investment.

According to OPM, the following factors are identified as keys to successful succession planning initiatives:

- Senior leaders are personally involved.
- Senior leaders hold themselves accountable for growing leaders.

- Employees are committed to their own self-development.
- Succession is based on a business case for long-term needs.
- Succession is linked to strategic planning and investment in the future.
- Workforce data and analysis inform the process.
- Leadership competencies are identified and used for selection and development.
- A pool of talent is identified and developed early for long-term needs.
- Development is based on challenging and varied job-based experiences.
- Senior leaders form a partnership with human resources staff.
- Succession planning addresses challenges such as diversity, recruitment, and retention.

Presidio ISD should develop a plan to design and implement a succession planning process for district leadership.

The superintendent should identify a steering committee to design a leadership succession planning process that includes OPM–recommended steps as shown in **Figure 1–7**.

No fiscal impact is assumed for this recommendation until the district decides how to implement a succession planning process for district leadership. The committee could consider partnering with an outside facilitator from a regional education service center or expand the current partnership with the University of Texas of the Permian Basin.

Since the onsite review, the district reported that it recently submitted a grant proposal in conjunction with the University of West Georgia to increase the number and percentage of rural leaders who possess the skills, dispositions and competencies necessary to effect improved student learning in high need schools. The grant would help create a Regional Leadership Pipeline Preparation Program.

LEADERSHIP STAFFING ALLOCATIONS (REC. 6)

Presidio ISD lacks a staffing allocation model for the assignment of campus leaders.

During the second semester of school year 2011–12, Presidio ISD contracted with TASB to conduct a district staffing

review. This review included interviews with key staff members, detailed questionnaires, and an analysis of PEIMS reports, employee rosters, employee assignment data, position control files, master schedules, and Academic Excellence Indicator System (AEIS) reports. Presidio ISD data were also compared to a group of Texas peer districts that included Fabens, Greenwood, Kermit, Monahans, and Pecos-Barstow-Toyah independent school districts. The primary review and recommendations included the following staffing categories:

- instructional and administrative support staffing;
- elementary school teachers;
- middle school teachers;
- high school teachers;
- special education staffing;
- student nutrition staffing;
- operations and facilities staffing; and
- human resources staffing.

Recommended staffing reductions were to be achieved through attrition over the next several years. In addition to the review of the positions listed above, the TASB analyst utilized PEIMS categories for non-classroom support supervisory and administrative positions, including the following:

- Professional support - counselors, nurses, librarians, diagnosticians, and curriculum specialists
- Campus administrator - campus principals, assistant principals, and athletic directors
- Central office - superintendent, department directors, and other central office exempt positions

The report combined all of these positions into one category and compared the number of positions to state averages and determined the district was staffed 1.4 positions less than the state average and that no adjustments were needed in the area of administration.

While the review was comprehensive and provided some valuable information related to the year in which it was conducted (school year 2011–12), it did not provide the district with a comparison of positions within non-classroom support supervisory and administrative positions nor guidance for a staffing allocation model to be used in future annual staffing review processes. Central office and campus

**FIGURE 1–7
RECOMMENDED STEPS FOR SUCCESSION PLANNING**

Step 1: Link Strategic and Workforce Planning Decisions	Identifying the long-term vision and direction; Analyzing future requirements for products and services; Using data already collected; Connecting succession planning to the values of the organization; and Connecting succession planning to the needs and interests of senior leaders.
Step 2: Analyze Gaps	Identifying core competencies and technical competency requirements; Determining current supply and anticipated demand; Determining talents needed for the long term; Identifying “real” continuity issues; and Developing a business plan based on long-term talent needs, not on position replacement.
Step 3: Identify Talent Pools	Using pools of candidates versus development of positions; and Identifying talent with critical competencies from multiple levels—early in careers and often.
Step 4: Develop Succession Strategies	Identifying recruitment strategies; Identifying retention strategies; and Identifying development/learning strategies.
Step 5: Implement Succession Strategies	Implementing recruitment strategies; Implementing retention strategies; Implementing development/learning strategies; Communication planning; Determining and applying measures of success; Linking succession planning to HR processes; and Implementing strategies for maintaining senior level commitment.
Step 6: Monitor and Evaluate	Tracking selections from talent pools; Listening to leader feedback on success of internal talent and internal hires; Analyzing satisfaction surveys from customers, employees, and stakeholder; and Assessing response to changing requirements and needs.

SOURCE: U.S. Office of Personnel Management publication, September 2005.

level leadership positions were put in one category and analyzed as a group. This analysis does not allow for a review of actual number of staff in central office or at individual campuses and potentially masks necessary data to determine whether staff are allotted based on district/student needs.

Figure 1–8 shows salary expenditures for Presidio ISD and the peer districts used for the purpose of this performance review. As a percentage of total funds spent, Presidio ISD spends slightly more on administrator positions than two of the peer districts but slightly less than two other peer districts and the state average. However, when considering actual

dollars spent on campus administration per student, Presidio ISD spends \$217 more than the district with the lowest cost per student and \$26 more than the district with the next highest cost per student. In addition, it spends \$119 more per student than the state per student average.

Lack of a process for reviewing annual school staffing formulas for individual positions puts a school district at risk of overstaffing non-essential positions and understaffing essential positions. This can happen for a variety of reasons, including changes in state and/or federal instructional

FIGURE 1–8
SALARY EXPENDITURE BY FUNCTION
PRESIDIO ISD, PEER DISTRICTS AND STATE AVERAGE
SCHOOL YEAR 2011–12

DISTRICT	PRESIDIO ISD	MONTE ALTO ISD	MULESHOE ISD	SANTA ROSA ISD	TORNILLO ISD	STATE AVERAGE
Administrator Salaries as Percentage of All District Funds Expended	4.8	6.1	6.4	4.2	4.5	5.6
Cost Per Student	\$611	\$574	\$585	\$439	\$394	\$492

SOURCE: Academic Excellence Indicator System (AEIS) reports for school year 2011–12.

requirements, changes in state and federal funding allocations, or changes in the size of the student population.

TEA’s Financial Accountability System Resource Guide (FASRG), January 2003, Section 9.3.2.3, describes school staffing formulas as “contained in school district local policies and/or district/campus improvement plans (and) provid[ing] a benchmark figure that is used to calculate supplemental full-time equivalent (FTE) staff.” Districts use staffing formulas for budgeting, as a basis to charge other costs, and as guidelines for the efficient use of human resources. Staffing formulas also help determine what services are basic and what are supplemental and eligible for specific funding sources.

The Baltimore County Public Schools has a process for allocating positions to schools, including leadership positions, to ensure that the schools are staffed within the annual adopted operating budget’s authorized position totals. The process begins with the determination of the number of authorized positions in the adopted operating budget for the upcoming fiscal year, final student enrollment projections, and equitable school staffing standards. The staffing review process is ongoing and is designed to ensure the allocations of all authorized positions in a timely manner by the beginning of each school year to meet changes in enrollment and instructional focus.

Presidio ISD should design an annual process to review individual categories of leadership staffing based on district needs. Such a design will ensure that leadership positions are equitably and efficiently distributed at all campus levels and all programmatic and operational levels at the central office level.

The Presidio ISD superintendent, along with selected administrators, should revisit the recommendations of the TASB staffing review conducted in January 2012 and research staffing ratios currently used by districts similar to

Presidio ISD. This data should be used to create a standard staffing ratio for staffing for each school year.

Until the district completes the TASB/Presidio ISD review of the salary survey study, the fiscal impact of this recommendation cannot be determined.

PROCEDURES MANUAL (REC. 7)

Presidio ISD lacks a process for creating and maintaining districtwide administrative procedures manuals.

Currently, the district maintains an Athletic Handbook, Employee Handbook, TEA Professional Development and Appraisal System (PDAS) Teacher Manual, as well as a Student Code of Conduct (in English and Spanish) and Student Handbook (in English and Spanish). In all other areas, staff reported that administrators and teachers rely on an unwritten interpretation of district procedures or informal folders and notebooks that represent a specific or partial set of procedures for specific functions. Presidio ISD functions, such as business operations, human resources, facilities, and food service, do not have comprehensive written procedures manuals for guiding day-to-day operational activities.

The lack of a comprehensive district procedures manual or individual department manuals can result in inconsistent, inefficient, and possibly non-compliant district operations. In addition, the district risks loss of institutional knowledge with employee turnover, since, as some staff reported, some long-time employees are the sole personnel who know how things are done and where important resources are located. In addition, when a new employee is assigned to a position, there is no guidance related to the day-to-day procedures of the function. This is a consideration especially in a small district like Presidio ISD where there may be no other staff members in a department or with similar responsibilities.

An example of the need to develop procedure manuals is the need for the district to contract with Fox and Company, P.C.

at an annual base fee of \$24,000 and possible additional time at an hourly rate of \$60 per hour to ensure that the Business Office functions appropriately and within the law. If the district had a comprehensive manual of Business Office functions, staff could use the manual to guide their day-to-day activities and reducing the need for this consultant.

While district policies provide broad guidelines that reflect the aims and objectives of the organization, procedures define the steps and activities that constitute day-to-day operations in alignment with best practices and standard operating processes and state and federal rules and regulations.

Presidio ISD Board Policy BP (LEGAL) states that one of the duties of the superintendent is to “develop or cause to be developed appropriate administrative regulations to implement policies established by the Board.” BP (LOCAL) is more specific and states that the “procedures must be consistent with Board policy and law and shall be designed to promote the achievement of District goals and objectives.” This policy goes on to state that “all administrative regulations shall be under the direction of the Superintendent and shall constitute the administrative guidelines of the District and shall consist of guides, handbooks, and forms, as well as other documents defining standard operating procedure and designated ‘Regulations.’”

The Illinois Association of School Boards (IASB) defines an administrative procedures manual project as an effort to create processes and procedures to support the day-to-day implementation of legal and local policies and practices in all functions of the organization. The IASB suggests that an organization should examine the following standards for administrative procedures manuals:

- The district should have available in its administrative offices a copy of an Administrative Procedures Manual implementing the Board Policy Manual and other district practices.
- The district administrative procedures manual includes all procedures expressly required by current board policy, state or federal law, and important day-to-day district practices.
- The manual includes all districtwide administrative procedures.
- The manual is coded with an easily identifiable coding system.
- The manual has an alphabetical index.

- Each section of the manual has a table of contents.
- Each procedure is clear and concise.
- Each procedure is coded to correspond to the board policy it implements.
- Effective dates are clearly stated at the end of each procedure.

Bandera Independent School District, a district of 2,448 students, has developed a comprehensive Business Administrative Procedures Manual. The manual provides a complete guide for Business Office activities in all areas of responsibility and can be utilized as a model for a more comprehensive Administrative Procedures Manual for all functional areas in a school district.

Presidio ISD should develop and publish an electronic district administrative procedures manual.

The superintendent should assign a Tier 1 Administrative Staff member to work with and gather written documentation from district administrators and department heads regarding major procedures/practices in each of their functional areas. The current finance and business contractors could provide expertise and assistance in this process as part of their annual contract. This process should be designed to identify areas in which established procedures do not currently exist but are needed. A process and scheduling for review of the electronic manual should be developed, and relevant staff should provide feedback and revisions as appropriate. The comprehensive manual should then be published on the district intranet. Responsibilities for updating the manual as procedures change or new ones are developed, approved, deleted, or modified should also be assigned. An annual review of the relevant sections of the manual should be a part of each senior administrator’s duties.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 1: DISTRICT LEADERSHIP, ORGANIZATION, AND MANAGEMENT							
1. Develop and implement a training plan focused on the differentiated roles and responsibilities and continuing education needs of the board and the superintendent.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2. Establish procedures governing board travel.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3. Decrease the number of direct reports to the superintendent to promote academic and operational efficiency.	(\$47,573)	(\$47,573)	(\$47,573)	(\$47,573)	(\$47,573)	(\$237,865)	\$0
4. Develop a three- to five-year strategic plan to guide district direction for programmatic, financial, and operational functions.	\$0	\$0	\$0	\$0	\$0	\$0	(\$10,000)
5. Develop a plan to design and implement a succession planning process for district leadership.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6. Design an annual process to review individual categories of leadership staffing based on district needs.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
7. Develop and publish an electronic district administrative procedures manual.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	(\$47,573)	(\$47,573)	(\$47,573)	(\$47,573)	(\$47,573)	(\$237,865)	(\$10,000)

CHAPTER 2

EDUCATIONAL SERVICE DELIVERY

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 2. EDUCATIONAL SERVICE DELIVERY

An independent school district's educational service delivery function is responsible for providing 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, while smaller districts have staff assigned to multiple educational-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.

Presidio Independent School District (ISD) includes three campuses: one elementary campus, one middle school campus and one high school campus that offers two distinct high school programs, the traditional high school and the Early College High School (ECHS). The two high school programs function independently. Each has its own principal and administrative structure, and they are housed in separate buildings on the campus but are connected with a covered

sidewalk. Presidio ISD had a total of 1,440 students for the 2012–13 school year.

Figure 2–1 shows the demographics of Presidio ISD compared to the state averages. Presidio ISD has much larger populations of Hispanic students, economically disadvantaged students, at-risk students, and English language learners than the state average. Presidio's proximity to the Mexican border helps explain these numbers.

Figure 2–2 shows historical accountability rating data for Presidio ISD from school years 2007–08 to 2012–13. For the school years 2007–08 to 2010–11, the state's

**FIGURE 2–1
PRESIDIO ISD DEMOGRAPHICS
SCHOOL YEAR 2012–13**

STUDENTS	DISTRICT	STATE
Hispanic	95.9%	51.3%
Asian	2.2%	3.6%
White	1.9%	30.0%
Two or More Races	0.1%	1.8%
African-American	0.0%	12.7%
American Indian	0.0%	0.4%
Pacific Islander	0.0%	0.1%
Economically Disadvantaged	87.4%	60.4%
English Language Learners	54.3%	17.1%
At-Risk	68.1%	44.7%

SOURCE: Texas Education Agency, Texas Academic Performance Report 2012–13.

**FIGURE 2–2
PRESIDIO ISD STATE ACCOUNTABILITY RATINGS
SCHOOL YEARS 2008–09 TO 2012–13**

YEAR	DISTRICT	HIGH SCHOOL	MIDDLE SCHOOL	ELEMENTARY SCHOOL	ASSESSMENT INSTRUMENT
2008–09	Recognized	Recognized	Acceptable	Acceptable	TAKS
2009–10	Recognized	Recognized	Recognized	Recognized	TAKS
2010–11	Acceptable	Acceptable	Acceptable	Recognized	TAKS
2011–12	None	None	None	None	STAAR
2012–13	Met Standard	Met Standard	Met Standard	Met Standard	STAAR

NOTES: Accountability ratings were not issued in school year 2011–12 with the implementation of new state assessments.

Acceptable = Academically Acceptable; Unacceptable = Academically Unacceptable.

TAKS = Texas Assessment of Knowledge and Skills; STAAR = State of Texas Assessments of Academic Readiness

SOURCES: Texas Education Agency, Academic Excellence Indicator System Report, school years 2008–09 to 2011–12; Texas Academic Performance Report, school year 2012–13.

accountability system identified schools as Academically Unacceptable, Academically Acceptable, Recognized, or Exemplary. In school year 2011–12, the state of Texas did not issue accountability ratings. In 2012–13, the new accountability system was based on ratings of Improvement Required or Met Standard.

As required by the federal No Child Left Behind Act, the Texas Education Agency (TEA) Department of Assessment and Accountability identifies and makes public reports on districts and campuses that do not make adequate yearly progress (AYP). **Figure 2–3** shows the AYP results from the last five school years. Presidio ISD missed AYP at both the middle and high schools for mathematics and at the elementary school for reading. Further, both the middle and high schools have not met AYP for two consecutive years; therefore, these schools are currently identified as being at Stage 1 in the Title I, Part A, School Improvement Program (SIP).

Title I funds are federal funds that are appropriated to schools to provide educational services to low-income students. Title I schools may fail to meet AYP due to low performance in reading and mathematics or low attendance or graduation rates. Schools that fail to meet AYP in one or more of the same areas for two subsequent years are required to participate in the SIP and may be subject to sanctions.

There are five stages in the SIP, each with more stringent requirements intended to focus on the improvement of student learning outcomes. Stage 1 requires parental notification and the development of a district improvement plan; the school must meet AYP for two consecutive years to exit the SIP. Schools that fail to meet AYP for two consecutive years while in Stage 1 will move to Stage 2. In this stage, parents must again be notified, the district must offer Supplemental Educational Services, and the district must implement the improvement plan developed in Stage 1. A

school moves to Stage 3 of the SIP for missing AYP for the same indicator that resulted in Stage 2 SIP for three consecutive years. At Stage 3, consequences become more severe, and the state is required to take at least one Corrective Action:

- reduce funding;
- require the implementation of a new curriculum;
- replace district personnel;
- remove schools from the jurisdiction of the district;
- appoint a trustee;
- abolish or restructure the district; and/or
- allow School Choice, which is an option for students to transfer to another district, with transportation at the expense of the Stage 3 district.

A district will move to Stage 4 after one year of Corrective Action pursuant to Stage 3 and failing to meet AYP for the same indicator for the fifth consecutive year. In Stage 4, the district must begin to plan for Restructuring, which requires major changes in a school’s operation while continuing to: allow for School Choice; provide technical assistance to the school; provide Supplemental Educational Services; and take Corrective Action. Stage 5 is the final stage in SIP, and it results in the restructuring of the school, alternative governance, and/or closing the school.

Administration of educational service delivery in Presidio ISD is the responsibility of the curriculum/special programs/federal programs director. This individual has been employed by the district for several years, reports directly to the superintendent, and is actively involved in the day-to-day oversight of educational service delivery functions. The curriculum/special programs/federal programs director has in-depth knowledge of both the historical and current

FIGURE 2–3
PRESIDIO ISD ADEQUATE YEARLY PROGRESS RATINGS
SCHOOL YEARS 2007–08 TO 2011–12

AYP STATUS	DISTRICT	HIGH SCHOOL	MIDDLE SCHOOL	ELEMENTARY SCHOOL
2007-08	Met	Missed	Met	Met
2008-09	Met	Met	Met	Met
2009-10	Met	Met	Met	Met
2010-11	Missed	Missed	Missed	Met
2011-12	Missed	Missed	Missed	Missed

SOURCE: Texas Education Agency, Adequate Yearly Progress (AYP), school years 2007-08 to 2011-12.

practices related to educational service delivery in the district. The organizational structure related to educational service delivery is fairly flat, with all district-level and campus-level administrators reporting directly to the superintendent as shown in **Figure 2–4**.

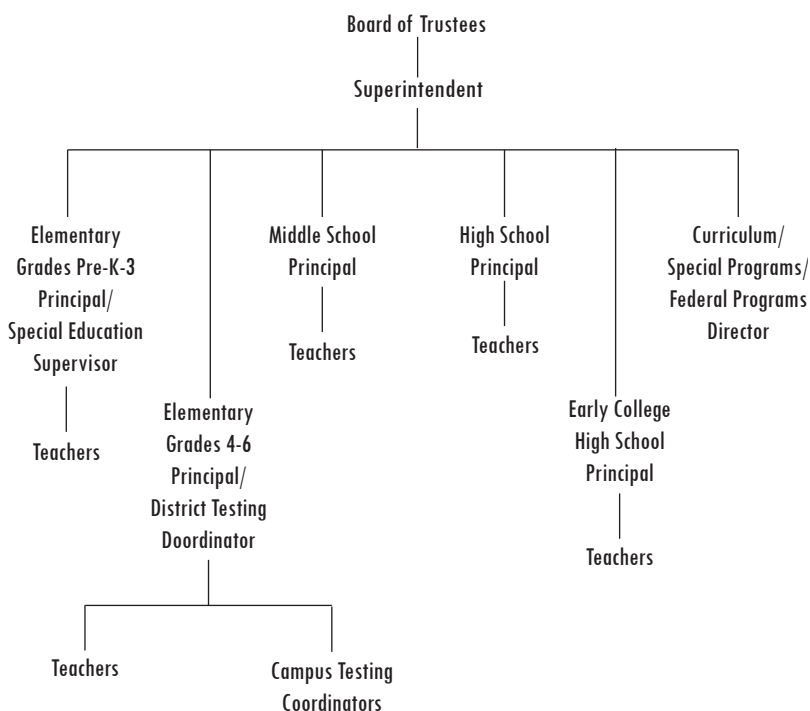
ACCOMPLISHMENTS

- ◆ Presidio ISD offers a Newcomers program at the secondary level that provides comprehensive support and instruction for students who enter the district with limited English language skills.
- ◆ Presidio ISD implemented an accelerated alternative education program for at-risk students.

FINDINGS

- ◆ Presidio ISD does not have a board-approved comprehensive curriculum management plan with written operating procedures that outlines the process for curriculum review and revision.
- ◆ Presidio ISD does not offer a comprehensive program to meet the instructional needs of students who have been identified as gifted and talented.
- ◆ Presidio ISD does not meet the professional development needs of all teaching staff consistently across the district.
- ◆ Presidio ISD’s academic structure isolates grade nine students who choose not to opt into either the Early College High School or the district’s new Career and Technology Education program that will begin in fall 2014.
- ◆ Presidio ISD does not have a formal process to evaluate outcomes related to interventions and programs.

**FIGURE 2–4
PRESIDIO ISD ORGANIZATION FOR EDUCATIONAL SERVICE DELIVERY
SCHOOL YEAR 2013-14**



SOURCE: Presidio ISD Administrative Organization Chart, 2013.

RECOMMENDATIONS

- ◆ **Recommendation 8: Develop and implement a comprehensive curriculum management plan.**
- ◆ **Recommendation 9: Develop and implement a comprehensive gifted and talented program to meet the instructional needs of identified students.**
- ◆ **Recommendation 10: Develop and implement a comprehensive professional development plan to meet the continuing education needs of all teaching staff.**
- ◆ **Recommendation 11: Review existing policy related to the location of the grade nine students. Solicit input from the community, including students, to determine if the current campus configuration is consistent with the wants and needs of the community, and whether the current configuration is in the best interest of these students both academically and developmentally.**
- ◆ **Recommendation 12: Develop a systematic plan for formal program evaluation.**

DETAILED ACCOMPLISHMENTS

NEWCOMER SUPPORT

Presidio ISD offers a Newcomers program at the secondary level that provides comprehensive support and instruction for students who enter the district with limited English language skills.

Staff reported that Presidio ISD views its programs for English language learners (ELL) as an accommodation to the regular school program. Accordingly, the Newcomers programs at the district's middle and high schools are offered as an intensive intervention for students who also participate in regular classes.

The need for English as a Second Language (ESL) services in the district is high. According to data from the U.S. Census Bureau 2007–2011 American Community Survey, 95.8 percent of the population in the area served by Presidio ISD age five and older speaks Spanish at home, compared to the statewide figure of 29.3 percent. Texas Academic Performance Report data show that Presidio ISD serves a significantly higher number of ELLs (54.3 percent) than the state average (17.1 percent).

The challenges to serve this population of students emerged as a reoccurring theme during school review team interviews

and focus groups with teachers and administrators. Campus leaders reported that there are currently 141 ELLs at the middle school. Additionally, staff described 35 middle school students as having “zero English,” meaning no exposure to spoken or written academic English. ESL teachers in the district reported that there are 93 LEP students at the high school, and 74 of these students had not yet passed the reading section of the State of Texas Assessments of Academic Readiness (STAAR).

The district uses LAS Links as the oral language proficiency test to determine a student's level of English language ability. Students who score below a 4 on a scale of 1 to 5 are identified as LEP, and the district's Language Proficiency Assessment Committee (LPAC) makes recommendations for placement and services. Criteria for identification and placement of students are fully outlined in the Presidio ISD Bilingual/ESL Department summary document for 2012–13.

Newcomers, those with little to no English language skill, are grouped into a cohort assigned to an ESL teacher. The students attend core content classes in English language arts, social studies, science, and mathematics with an ESL teacher; the teacher also leads the students for one or two additional class periods each day to provide additional ESL support. If necessary, ESL teachers re-teach content in Spanish and can assist in completing assignments.

The secondary Newcomer program at Presidio ISD supports the development of oral language proficiency, which is the foundation for literacy and for learning in school and outside of school. In addition, without intensive and targeted interventions, students who lack literacy or an educational foundation in their primary language will have difficulty learning English. Those students may take a longer time to reach the level of advanced fluency that is needed for academic engagement, as indicated by a recent report from the state of Colorado's Colorín Colorado program (www.colorincolorado.org). Because Newcomer students enter Presidio ISD in middle or high school with little to no exposure to the English language, and some with minimal education in the primary language, the Newcomers program provides a vital service.

DROPOUT PREVENTION

Presidio ISD implemented an accelerated alternative education program for at-risk students.

The Presidio ISD Disciplinary Alternative Education Program (DAEP) provides educational services to students

who have been removed from the classroom temporarily due to disciplinary reasons; however, discipline does not appear to be a large issue within the district. During the 2012–13 school year, 23 middle school and high school students were placed in the DAEP. In-school suspensions included 92 middle school students and 16 high school students.

In addition to the district's Disciplinary Alternative Education Program (DAEP), Presidio ISD has implemented two additional alternative education programs (AEP) to better meet the needs of students. The first is the Program of Accelerated Education (PACE) program, which is primarily used for credit recovery. A second accelerated program specifically targeting students who might otherwise drop out of school was new in school year 2013–14. At the time of the onsite review, this program had not yet been named nor was there formal written documentation of the program. As described by teachers and administrators, this newest AEP approach was developed using best practices and accepted dropout prevention strategies. These strategies are consistent with those identified by the Texas Education Agency (TEA) as effective for dropout prevention and re-engagement.

To support these programs, Presidio ISD has purchased a software package most often used as a high school credit recovery program. Students in the PACE program use the software for traditional credit recovery for courses previously failed. More advanced students use the software to take courses that the district is not able to offer, such as higher level mathematics courses. Students in the new, unnamed, accelerated program are also using the software package so that they can complete coursework in the time and sequence that best meets their individual needs so that they are retained in school.

This new, unnamed program in particular fills a gap for the district's at-risk student population. The specific target group for the program is students who have aged out, already dropped out, or who are in danger of dropping out due to issues such as pregnancy, family circumstances, or the need to work full-time. The high school counselor identifies students who could potentially benefit and makes a recommendation to the director of the AEP. Based on this recommendation, a meeting is set up with the student, the parents or legal guardian, the counselor, and the director of the AEP. The purpose of the meeting is to explain the program to the student and parents and to determine their willingness and ability to participate. A personalized education plan is then drafted that includes individual goals, which are identified based upon an audit of the student's

current academic credits, and a realistic academic timeline is established. Initial focus is on the area where the student is farthest behind. The intention is to get students caught up and make significant progress toward fulfilling graduation requirements.

The new, unnamed Presidio ISD dropout intervention AEP provides learning environments that are challenging and personalized for each student, mentors/adults as role models and advocates for students, and academic support for students who are behind in school. The program follows TEA recommendations for dropout prevention and recovery. Although this new, unnamed program is in the early stages of implementation, it is already making an impact. The program began on August 13, 2013, with nine students. By the end of November, seven had earned enough credits to graduate and will be allowed to participate in the May 2014 commencement ceremony. An additional five students have since started the program.

DETAILED FINDINGS

CURRICULUM REVIEW AND REVISION (REC. 8)

Presidio ISD does not have a board-approved comprehensive curriculum management plan with written operating procedures that outlines the process for curriculum review and revision.

Currently, the district uses a district-established curriculum. Before establishing this curriculum, the district purchased Project CLEAR (Clarifying Learning to Enhance Achievement Results), which district staff stated that they were not able to fully implement due to lack of training. The curriculum/special programs/federal programs director reported developing curriculum maps during the last five years and working toward developing common assessments to focus on classroom continuous improvement (CCI).

While the district has made a commitment to curriculum alignment in its District-Level Continuous Improvement Plan (CIP), it is unclear how this process is implemented. The Presidio ISD CIP indicates that the district "...will continue to align the curriculum horizontally and vertically to ensure appropriate foundation skills to minimize gaps in instruction." Aligning the curriculum is one of the Strategies/Initiatives/Activities that are identified within the CIP to target academic achievement.

The onsite review team requested documents relating directly to curriculum, specifically: a curriculum audit; a description

of the curriculum development cycle; and internal procedures or guides that address the administration, monitoring, or evaluation of the curriculum. The district provided one set of documents that did not adequately address the topics specified in the request. The submitted documentation contained these items:

- introductory page containing a paragraph that provides a brief overview of the yearly curriculum review process;
- document titled “Presidio ISD Curriculum Map Checklist”;
- document titled “Curriculum Check”;
- document titled “Presidio ISD Curriculum”;
- TEA document “Curriculum, Instruction and Assessment—NCLB Comprehensive Needs Assessment”;
- document titled “PHS”; and
- untitled document that appears to be a template for a lesson plan.

These documents appear to be individual tools that may be used during the curriculum review process. However, there are no supporting documents, written operating procedures, directions, or timelines to explain how the review process occurs. Since the time of the review, the district states that it follows a yearly cycle for teachers to update curriculum maps, including unit meetings during the school year, and meetings during professional development trainings over the summer, and they plan to have all these curriculum-related procedures in writing.

The onsite review team asked administrators and teachers to discuss the process that the district used to review and revise curriculum. The only individuals who could provide a detailed description of the process were the superintendent and the curriculum/special programs/federal programs director. Other staff indicated that the superintendent and the curriculum/special programs/federal programs director handled curriculum revisions.

The Texas Essential Knowledge and Skills (TEKS) define what students are expected to know and be able to do related to each content area and at each grade level for kindergarten through grade 12. The TEKS are not a curriculum; they are a set of curriculum standards. The intent is that schools will

use the TEKS to guide decisions regarding the development or selection of curriculum.

A district’s curriculum provides the framework to determine:

- what content will be taught;
- how the content will be taught;
- how students will be assessed; and
- the level to which students must perform.

The curriculum articulates these expectations to all stakeholders so that they can support the educational process. Curriculum development and management are a complex and ongoing process. Districts and schools have the autonomy to develop or adopt curriculum that meets their unique needs, as long as the curriculum adequately addresses approved standards. Despite the variability in curricula across or within states, some basic standards for curriculum management are consistent. Purchasing a curriculum package or officially implementing a district-developed curriculum is not the end of the process. Curriculum development and review are typically seen as a cyclical process that allows for involvement of administrators, teachers, students, parents, and the community.

Curriculum is closely aligned to standards, instruction, and assessment; it includes best practices and assessment models, and is aligned to staff professional development. Best practice indicates that districts have a formal written process in place for regular review and revision of curriculum. Curriculum plans specify the expectations for everyone involved in the educational process: students, teachers, aides, administrators, and parents. Additionally, curriculum development, review, and revision processes are typically concise, written, and available to all stakeholders.

A variety of resources can be used to establish a curriculum management plan. The Association for Supervision and Curriculum Development (ASCD) provides guidance and sample operating procedures in *Developing Curriculum Leadership and Design* (www.ascd.org). The Department of Education for the state of Alaska and the Montana Office of Public Instruction (www.eed.state.ak.us and www.opi.mt.gov) both offer models for curriculum development, review, and revision, as well as guidance for implementation and evaluation of curriculum. At the district level, another example is Ozark Public School District in Ozark, Missouri. This 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 (oz.schoolwires.net).

The district should develop and implement a comprehensive curriculum management plan.

The plan should include written Standard Operating Procedures (SOPs) to ensure transparency and to standardize the process for managing curriculum. To develop a curriculum management plan with written SOPs, the district should identify a district curriculum committee. The committee should include administrators and teachers from the elementary, middle, and high school campuses and should be convened for one purpose: evaluate the process that currently exists and identify best practices in curriculum management to adopt them in Presidio ISD. The team can review existing curriculum development and management plans from professional organizations and other districts. In addition, several school performance reviews published by the LBB in 2009 focus on curriculum management. Collectively, the members of the committee should develop and describe formal steps and a timeline for a district process of curriculum review and revision.

This recommendation could be implemented with existing resources.

GIFTED AND TALENTED INSTRUCTION (REC. 9)

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

The Presidio ISD school board and district administrators have provided opportunities, such as the Early College High School (ECHS), for students to become college- and career-ready. However, data indicated that the district either does not provide, or does not have a process to provide, instructional programs targeted to students who may be gifted and talented (G/T). Currently, G/T services provided in the district are minimal. While the district is administering assessments to identify students who may qualify for G/T services, it is difficult to determine the extent to which services are actually delivered. Teachers and principals interviewed during the onsite review stated that they did not do anything specific for G/T students, although they believed they were supposed to provide these services in the classroom. The Texas Academic Performance Report 2012–13 District Profile indicates that 80 students (5.6 percent) in Presidio ISD were identified as G/T.

District administrators, campus leaders, and classroom teachers acknowledged that Presidio ISD does not have a comprehensive program for addressing the needs of G/T

students. Teachers repeatedly stated that they were not able to provide enrichment opportunities for these students. At the elementary level, they said this was partially because the district no longer offered afterschool programs in the arts and it no longer participated in University Interscholastic League (UIL) events at the elementary level. The district feels that the needs of G/T students need to be met during the regular school day, and a variety of training opportunities are provided to teachers to help them achieve that goal.

Although the district uses a nomination form suggesting possible areas of giftedness for a student, once that student is nominated, teachers said that the instrument the district uses to screen for G/T does not indicate the area(s) in which a student is gifted (e.g., intellectual, creative, or artistic). Presidio ISD uses two tests to assess for G/T. The first is a nonverbal measure of general ability, and the second measures a student's learned reasoning abilities in three areas: verbal, quantitative, and nonverbal. Neither assessment can be used to identify area of giftedness. Thus, teachers said that they do not have adequate information to provide supplemental instruction or programming for G/T students.

In addition, there is a Texas State Plan for the Education of Gifted/Talented Students. The State Plan specifies the requirements for G/T and provides guidance to schools for the development and delivery of G/T programs. The State Plan is divided into five sections: Student Assessment, Service Design, Curriculum and Instruction, Professional Development, and Family/Community Involvement. Within each section, the plan differentiates between programs that are “in compliance,” “recommended,” or “exemplary,” based upon the implementation of the G/T standards in the district's plan.

As a way to help districts meet the criteria of the plan, TEA developed the Texas Performance Standards Project (TPSP), which “...provides a coherent package of standards, curriculum, and assessments for use in G/T programs from kindergarten through high school” (texaspsp.org).

The Presidio ISD G/T plan is not consistent with the requirements of the *Texas State Plan for the Education of Gifted/Talented Students* (State Plan) in any of these sections:

- Section 1: Student Assessment—the district plan does not identify which areas of giftedness the district serves, nor does it address the G/T assessment criteria used at the kindergarten level;
- Section 2: Service Design and Section 3: Curriculum and Instruction—the lack of detail in the district plan

and the sparseness of the information provided by district staff indicate non-compliance with the state plan;

- Section 5: Family/Community Involvement—the district plan does not provide sufficient information regarding the learning opportunities that are provided for students; therefore, it is not possible to determine if parents are informed of the array of services and opportunities.

A recent analysis of data from the National Assessment of Educational Progress (NAEP), conducted by the Thomas Fordham Institute, found that the highest-performing students across America have made almost no gain in performance since the passage of No Child Left Behind (NCLB) legislation, while the performance of lower achieving students is increasing. Presidio ISD offers many programs and interventions to target the educational needs of the lowest-performing students, but it lacks a comprehensive program to address the needs of G/T students. Focusing on the needs of the lowest-performing students is a practice common to many public schools due to the current accountability environment. This can be challenging, however, when schools and districts do not serve their G/T students to the same extent as they serve other groups. It is also counterintuitive to the district's efforts to develop college- and career-readiness programs.

The National Association for Gifted Children (NAGC) has developed the Pre-K–12 Gifted Education Programming Standards. These standards provide guidance for the development and delivery of comprehensive programs and services for G/T students. NAGC provides additional resources, such as an assessment and planning tool for aligning G/T programs and services to K–12 standards, and a guide to plan and implement high-quality standards in G/T programs. These resources (www.nagc.org) can be used to guide the development and implementation of a comprehensive G/T program for Presidio ISD.

The district should develop and implement a comprehensive gifted and talented program to meet the instructional needs of identified students.

A G/T program development committee should be formed. The committee should include teachers who hold a G/T endorsement or G/T supplemental certificate, campus administrators, a district-level administrator, a counselor, and parents of students identified as gifted and talented. This committee will complete these 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 model;
- evaluate implementation;
- revise the model based on evaluation; and
- monitor and revise as needed.

There are no substantial anticipated costs associated with implementation of the recommendation to develop and implement a comprehensive G/T program. The fiscal impact assumes that the district would provide the necessary professional development with existing resources.

PROFESSIONAL DEVELOPMENT (REC. 10)

Presidio ISD does not meet the professional development needs of all teaching staff consistently across the district.

Presidio ISD is geographically isolated. Therefore, it is not feasible for educators to travel to attend continuing professional education (CPE). The closest university is located 104 miles away in Alpine, and Regional Education Service Center XVIII (Region 18) is 252 miles away in Midland. Practically speaking, the school district is the only local source of professional development for staff.

Presidio ISD provides the majority of CPE offerings for all instructional and administrative staff as in-service training in August before each school year. Additional CPE sessions are offered in January. This professional development provided by the district follows a face-to-face workshop approach, typically lasting from one to eight hours in a one-day session. The CPE provided by the district appears to consist of topics that are generally applicable to most educators. For example, recent topics included project-based learning and integrating technology in the classroom, which can benefit educators across grade levels and content areas. CPE activities such as data disaggregation and improving English reading skills of ELLs are most applicable to teachers of core content subjects.

Absent from the district-provided CPE are professional learning opportunities that are content-specific by discipline. **Figure 2-5** shows the CPE provided by the district for calendar year 2013.

**FIGURE 2-5
PRESIDIO ISD CONTINUING PROFESSIONAL
EDUCATION ACTIVITIES
CALENDAR YEAR 2013**

ACTIVITY TITLE	DATE	HOURS	ATTENDEES
Team Building/Change	01/03/2013	7	31
Inquiry/Project-Based Learning	01/03/2013	6	38
Integrating Technology in the Classroom	01/03/2013	6	27
Project-Based Learning	01/05/2013	8	28
Database	01/16/2013	1	48
Improve the English Reading Skills of English Language Learners	01/30/2013	6	7
Differentiated Technology Training	08/19/2013	4	129
Data Disaggregation	08/19/2013	3	93
Safety Training Videos	08/20/2013	7	21
Gifted and Talented Update	08/20/2013	6	115
Project-Based Learning Assessment	08/20/2013	1	115
Professional Development and Appraisal System Update	08/21/2013	3	94
English Language Proficiency Standards/ Language Proficiency Assessment Committee Training	08/21/2013	2	113
Special Education Updates/Safety Training	08/21/2013	2	113
Professional Development and Appraisal System Update	09/04/2013	7	19

SOURCE: Presidio ISD Workshop Registration Sheets.

Examination of the full five years of CPE data provided by the district identified only minimal content-specific CPE for mathematics, English language arts, social studies, and science teachers. Content-specific CPE for fine arts, foreign language, and career and technology education (CTE) was not provided. Interviews and focus groups with Presidio ISD

staff confirmed that the district provides little content-specific CPE in core content areas, and none in fine arts, foreign language, and CTE. Interviews and focus group data also indicated that requests for membership in professional organizations and requests to travel to professional conferences and training were typically rejected by district administration due to budget concerns and high cost of travel due to Presidio's isolated location.

In addition, the district's professional development offerings do not support some of their new initiatives. The district is developing a program with Texas State Technical College (TSTC) West Texas in which high school students will earn TSTC credit while enrolled in CTE courses at Presidio High School. The goal is that CTE students will graduate with either vocational certificates or hours toward associate's degrees. To meet the goals of the new program, CTE teachers said that they needed content-specific and industry-specific training to be current in their respective fields. In preparation for the program with TSTC, the district purchased new equipment (e.g., a 3-D printer and computer numerical control machines) in school year 2012–13, but, due to lack of training, this equipment is currently not in use. CTE teachers reported that they have been asking for professional development specific to their content areas, and that they have not received any such training. CTE staff stated that they believed the district was missing an opportunity to make full use of the opportunities that CTE could contribute to district initiatives, including the high school's Science, Technology, Engineering and Mathematics (STEM) Academy. CTE staff reported that multiple stakeholders would benefit from common planning and professional development opportunities with content-area teachers. Such planning and development would foster collaboration between the STEM Academy and CTE, and it could provide opportunities for relevant, real-world application of STEM learning.

Presidio ISD's approach to the delivery of professional development, while similar to many small districts, is challenging; teachers do not have access to recent and relevant research and best practices within their disciplines, which limits their opportunities for professional growth. For those content areas that have industry-specific requirements, such as CTE, the practices within the classroom may not be aligned with industry standards and real-world applications. Without specific training in industry standards, teachers will not be prepared to teach the dual-credit CTE classes the district plans to offer fall 2014 in conjunction with TSTC.

Given the lack of accessibility to differentiated training that is offered through the universities and Region 18, the specific professional development needs of teachers are not being met. Further, the effectiveness of new initiatives may be compromised by unaligned professional development offerings and a lack of attention to teacher training. However, the district does provide surveys to teachers asking for feedback and ideas on what types of trainings to offer.

The U.S. Department of Education (USDE) provides a variety of resources related to professional development. Additionally, the Association of Texas Professional Educators (ATPE) offers information regarding professional development and opportunities for educators to engage in online CPE, book circles, webinars, and independent study (www.atpe.org).

The Texas Administrative Code (TAC), Title 19, Part 7, Rule Section 232.13, outlines statutes related to certificate renewal and continuing professional education requirements for Texas educators. The TEA provides additional guidance regarding the CPE requirements for all classes of standard certificates issued since September 1, 1999. Classroom teachers are required to earn a minimum of 150 clock hours of CPE within each five-year period. TAC, Title 19, Part 7, Rule Section 232.11, specifies the content requirements for CPE. TEA guidance further specifies requirements for the content addressed within CPE activities, delivery systems for CPE, and approved CPE providers. At least 80 percent of CPE activities must be directly related to the certificate(s) being renewed.

TEA guidance documents on CPE activities for classroom teachers highlight “content area knowledge and skills” and “increasing knowledge of the subject area taught by the educator.” TEA also recommends that CPE activities should be selected based on the results of an educator’s annual appraisal, required pursuant to the TAC, Title 19, Chapter 21, Subchapter H. The agency provides a CPE Tracking Worksheet that educators should use to plan and document their CPE (www.tea.state.tx.us/cpe/).

TEA has also developed *Professional Development Imperative: Continuum for Quality Professional Development* to assist schools and educators in the purposeful selection of professional development that aligns with these indicators:

- results-driven learning—schools improve the learning of all students through well-designed professional development, using best practice research,

disaggregated data, campus/district goals, and parent/community input;

- student-centered learning—educators pursue and select learning opportunities that meet the identified needs of students;
- flexible groups—optimum learning and implementation occur in small, interactive groups, with group size determined by content and purpose;
- collaboration—educators, working collaboratively and with parents and community, make decisions about the objectives, content and processes that meet their professional development needs;
- follow-up—professional development requires follow-up to sustain and evaluate learning over time; and
- commitment—educators take responsibility for their own learning, and organizations provide resources that support learning.

This resource provides a measure to evaluate the effectiveness of CPE along a continuum and a means to evaluate evidence of results.

The district should develop and implement a comprehensive professional development plan to meet the continuing education needs of all teaching staff.

A professional development committee should be formed. Membership of this committee should include teachers, an administrator from each campus, and a district-level administrator. Teacher representation should include a teacher from each of the content areas: fine arts, foreign language, CTE, ESL, and G/T. This committee will complete these activities:

- review the CPE resources and recommendations of USDE, ATPE, TEA, and professional organizations in the content areas;
- develop a CPE planning model for the district, including:
 - program standards and objectives;
 - a process to conduct a CPE needs assessment;
 - a process/method to ensure the inclusion of CPE for all grade levels and content areas;

- a process/criteria for membership and travel to appropriate professional conferences and trainings;
- identification of CPE opportunities available via distance education; 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 model;
- evaluate implementation;
- revise the model based on evaluation; and
- monitor and adjust as needed.

This recommendation could be implemented with existing resources.

GRADE NINE CAMPUS CONFIGURATION (REC. 11)

Presidio ISD's academic structure isolates grade nine students who choose not to opt into either the Early College High School or the district's new Career and Technology Education program that will begin in fall 2014.

The Presidio ISD school board and district administrators are focused on developing programs for students to become college- and career-ready, such as the Early College High School (ECHS) and a Career and Technology Education (CTE) program that is expected to begin in fall 2014. While efforts to implement these programs are commendable, the district is not addressing the needs of students who do not choose to participate in one of these two programs. As a result, some students, parents and staff perceive that the grade nine students are being left behind at the middle school, while those who are enrolled in the ECHS have moved on to the high school, as will those who enroll in the new CTE program that will begin in fall 2014. This structure was implemented in January 2013.

Previously, the district included all grade nine students in a grade nine academy, which was housed at the middle school. The academy functioned as a separate campus, with its own principal and administrative structure. When the ECHS was implemented in January 2013, grade nine students who opted into the ECHS were moved to the high school, the administrative structure of the academy was eliminated, and

the rest of the grade was absorbed into the middle school structure.

District- and campus-level administrators cited a variety of reasons for this reconfiguration. District-level administrators stated that they thought this would encourage students to opt into the ECHS or the CTE so that the students could move to the high school campus as opposed to remaining at the middle school campus. However, they also indicated that, developmentally, some students were not ready for high school, and that they believed the primary reason for retaining some at the middle school had to do with improving their academic performance.

Data obtained from the review team's campus staff survey and from interviews and focus groups conducted during the onsite review suggest that this change has been problematic on several levels. First, the students who remain at the middle school report feeling isolated from their peers. These students say they feel like they are not considered as smart or as important as the students who are at the high school. Second, some teachers are now required to teach courses at both the middle and high school campuses. These teachers lose instructional and planning time, duty-free lunch, and opportunities to collaborate with their departmental peers. Third, because resources were taken from the middle and high schools to use at the ECHS, there is a perception of inequality regarding access to technology and other resources. Additionally, staff report that there is inequity in class size distribution. Staff said class sizes in grade nine at the middle school and class sizes for students in grades 10 to 12 who are not part of ECHS are larger than class sizes in the ECHS. Fourth, staff reported that there is a perception that leaving some students at the middle school is a punitive measure for those who do not participate in the ECHS.

This change has also caused a disruption in the Newcomers program. Some interview data indicated that changes in the program within the last two years may result in diminished outcomes for ELL students. These changes include the elimination of reading classes for Newcomers at the high school and the recent division of the grade nine class.

The Presidio ISD Bilingual/ESL Department program summary document states that students identified for Newcomer services will attend a reading class in addition to the four core content classes. The document also states that ELL students who are not placed in the Newcomers program are served with a reading support class and content-specific support. However, during interviews and focus groups,

teachers stated that district administrators decided to move the district reading specialist from the high school to the middle school, so the required reading class is no longer available at the high school.

The relocation of grade nine students has also resulted in a change in the overall delivery of ESL services for students in the Newcomers program. Before the division of the grade nine class, a teacher worked with a cohort of students for up to two subsequent years (e.g., grades 7–8, 9–10, and 11–12). Now, students may work with two different teachers for one year each, due to campus configurations. Teachers feel that this structure does not allow for the same depth of instruction that working with one teacher for a longer period provides. Teachers stated that they are tracking the outcomes for ELLs, and the teachers believe that they will be able to provide evidence of higher success rates with the former structure. However, there is no immediate plan to present this data to district administration.

Research conducted by the National Middle School Association in 2002 (www.nmsa.org) indicates that grade nine can be an exceptionally difficult time for students as they transition from middle school to high school. Students in this grade level often struggle with issues related to independence, peer pressure, self-worth, and self-identity, as well as academic and social challenges. Thus, grade nine students are typically considered at higher risk of dropping out of school or failing than students at other grade levels. Some district staff point to the benefits of having grade nine students with their younger peers as a protective measure. However, leaving some students at the middle school while promoting other students to the high school has the potential to harm students left behind. The students might be harmed both emotionally and academically, and the division might exacerbate existing tensions associated with adolescent transitions. Both effects could result in increased academic failure and higher dropout rates.

Current best practices for high school grade-level configurations focus on one of two approaches: either including grade nine in traditional high school programs, or isolating the grade from both middle and high schools either at a separate physical location or within the high school campus (i.e., the former academy structure). Research related to grade nine success indicates that these students are most successful in transitioning from middle school to high school when the campus configuration allows for grade nine students to be somewhat removed from other grade levels, both middle and high schools, due to differences in

developmental stage from students in grades 6–8 and grades 10–12. These practices have been well-researched and documented by schools and professional organizations, and appear in scholarly journals such as *The School Administrator*, a publication of the American Association of School Administrators (AASA).

The district should review existing policy related to the location of the grade nine students. The district should solicit input from the community, including students, to determine if the current campus configuration is consistent with the wants and needs of the community, and whether the configuration is in the best interest of these students both academically and developmentally.

Given some negative feelings generated by the implementation of the ECHS, administration should proceed cautiously and obtain stakeholder feedback at every stage of plan development. Implementation steps could include:

- form an administrative campus configuration review team;
- hold open meetings to solicit stakeholder input; and
- convene the school board to consider possible changes to the current campus configurations if stakeholder feedback indicates that a change is desired.

If stakeholder feedback indicates that a different configuration is desired, the review team should:

- draft plans for a new middle and/or high school campus structure and transition;
- hold open meetings to solicit stakeholder input on the draft plans;
- revise the plans based on stakeholder input;
- submit the plans to the board for adoption;
- begin the transition of grade nine students and staff to the high school campus;
- evaluate during the transition and during the first year after transition; and
- revise the campus structure based on evaluation if needed.

This recommendation could be implemented with existing resources.

PROGRAM EVALUATION (REC. 12)

Presidio ISD does not have a formal process to evaluate outcomes related to interventions and programs.

In recent years, Presidio ISD has implemented several new programs and initiatives to support district goals, but it lacks a formal process to evaluate outcomes related to these efforts. Two primary examples are the district's academic intervention strategies and the ECHS.

The district provides early interventions and supplemental supports for students who have a variety of needs. For example, students who performed poorly on the state assessment are identified for afterschool tutorials in September of the subsequent year. During the year, teachers also make recommendations for other students to attend tutorials based on nine-week assessment results. Students who have less urgent academic intervention needs might be identified to attend Saturday sessions starting later in the school year. Saturday sessions are also required for high school students who have poor attendance and those with an upcoming Advanced Placement examination.

Afterschool tutorials are small, focused tutoring groups for students who need support in a common area, such as a particular mathematical concept. The district provides transportation for these sessions, which are held from 4P.M. to 5P.M., five days per week. Students who live in the furthest outlying areas of the district, up to two hours away each way by bus, attend afterschool sessions only Monday–Thursday. Special education and language acquisition tutorials are also held after school and on Saturday. Teachers are paid a stipend to provide tutorials, and afterschool care is provided for young children of teachers who provide these services. While these efforts are time- and resource-intensive, the district does not monitor the initiatives for effectiveness, beyond nine-week assessments and current-year state assessments.

Another district program is the ECHS. The program is a partnership with the University of Texas of the Permian Basin (UTPB), and it is partially funded through a \$215,000 Meadows Foundation grant. UTPB provides professors for dual-credit courses, and students enroll in these courses online. In addition to the online classes, students visit the college once per month and receive monthly visits on their ECHS campus from the UTPB professors.

To enroll in sponsored (free) college courses online, students in grades 9–10 must enroll in the ECHS. The grant requires that all students be allowed to enroll, regardless of academic achievement level. To be certain that students and parents

fully understand the rigor of ECHS, the district requires an application that includes an essay signed by students and parents and an interview before acceptance. To enroll in college-level mathematics and English courses, students must also pass the associated Texas Success Initiative (TSI) examination, but they are allowed to take other courses during the interim. The district employs facilitators to help the students every day with online courses, and afterschool tutorials are available for struggling students. The district has not clearly stated its goals and desired outcomes that the board and the community can monitor.

The pending partnership with Texas State Technical College West Texas (TSTC) for dual credit is an example of another larger program that has not received an evaluation plan. Numerous other, smaller district programs, such as a STEM (science, technology, engineering, and mathematics) program and Rosetta Stone for afterschool fluency tutoring for English language learners, also have not been evaluated.

The absence of formal program evaluations means that the district does not have solid evidence to inform decisions regarding the continuation or modification of programs. Although board members report that the superintendent presents program reports, and principals often make board presentations at monthly meetings, some staff and community members said that program assessments are actually based on anecdotal observations rather than facts. While the community supports investment in the schools, lack of hard facts to support expenditures has led to allegations of unfairness across the district.

For example, data indicate that some parents complain about tutorials, saying that the afterschool sessions are a burden for their children. Others do not have a clear picture of the purpose of the sessions, saying for instance, “My son has A to B grades; he took the mock test, and now has to go to tutorials.” Other parents complain that there are too many students enrolled in tutorials, decreasing the programs’ effectiveness. Since there is no established program evaluation process, it becomes difficult to support or refute the various claims.

While many staff, students, and parents are enthusiastic about the ECHS, misunderstandings about the program have led to mixed feelings. With some lingering negative feelings about the program associated with implementation and perceptions of inequity, the transparency of the program may be difficult to explain without providing program outcomes. Even board members are not fully informed on

the purpose of the ECHS. One board member stated that half of the high school class is enrolled in the ECHS, and questioned the criteria for enrollment in the ECHS. The board member also stated: “We won’t know the outcome for four years.” When asked about evaluation of the ECHS program, some staff answered that the percentage of students passing college courses would indicate success. Others reported that the district will use ACT/SAT scores as a measure of success of the ECHS. Since the time of the review, the district stated that teachers, administrators, and staff make recommendations when it is necessary to make changes to strategies based on data and results. However, without clearly defined objectives and assessments of outcomes, it is difficult for the district to determine (and report) that a program is an effective use of district funds. Without a formal plan for program evaluation, tangible evidence about program effectiveness is not available to distribute to the community to increase awareness. Formal evaluation of educational programs serves a number of purposes. As noted in *Designing Schoolwide Programs, Non-Regulatory Guidance*, a USDE report published for Title I schools, schools should:

“conduct an annual review of the strategies in the schoolwide plan to determine if they are contributing to the desired outcomes either in terms of improvement in student achievement, or increases in other activities that lead to increased student achievement such as greater parental involvement or more high-quality professional development.”

Program assessment strategies for Title I can be adapted as a process for districtwide evaluation that can serve a range of

valuable purposes. Results from evaluation can support these findings:

- inform internal program management and help school leaders make informed decisions to improve the quality of their program;
- answer stakeholder questions and help them better understand how effectively the school is meeting its stated goals;
- increase understanding of specific strategies and help the school determine the usefulness of the activities to increase student achievement; and
- promote interest in and support of a program or activity by illustrating certain strategies, determine whether their outcomes improve student achievement, and increase support for their use.

Austin Independent School District (Austin ISD), a large urban Texas school district, has a dedicated research department that evaluates the district’s programs. While such scope is beyond the resources of small districts, Austin ISD’s evaluation resources and processes provide samples of good practice in school program evaluation. For example, Austin ISD’s District 2013–14 Evaluation Plan lists a summary of planned evaluations for the year, and it includes a short description of the targeted evaluation activities, as shown in **Figure 2–6**.

Presidio ISD should develop a systematic plan for formal program evaluation.

**FIGURE 2–6
AUSTIN ISD EVALUATION COMPONENTS
SCHOOL YEAR 2013-14**

SECTION	CONTENTS
Program Description	One paragraph describing the program being implemented in the schools.
Purpose of Evaluation	Two sentences describing the purpose for evaluating the program.
Evaluation Questions	Three to 10 questions that will help the district determine whether the program is effective.
Fiscal Considerations	Any factors related to money that may affect the evaluation.
Data Collection	Brief description of the data that will be used to measure effectiveness of the program.
Data Analyses	Explanation of how the data will be analyzed.
Timeline	Listing of important dates in the evaluation.
Required Reporting	Brief description of any stakeholders (such as federal government) in addition to the board of trustees.
Program Support	Brief description of staff who will be involved in the evaluation.

SOURCE: Austin Independent School District, Department of Research and Evaluation Plan of Work, 2013–2014.

Formalized evaluation will help district decision-making processes. A committee of district staff and stakeholders, preferably an existing committee such as the Districtwide Educational Improvement Committee (DWEIC) should meet and discuss the programs currently being implemented in the district. The DWEIC is a decision-making and advisory group that supports the board and superintendent in matters of planning, operations, and policies and procedures, and it would be a good organizational source for evaluation of programs. The committee can prioritize programs currently being implemented and create evaluation plans for each program, perhaps using the Austin ISD model shown in **Figure 2–6**. Each evaluation plan should include these components:

- purpose;
- evaluation questions;
- data sources and data collection procedures;
- timeline;
- methodology for analysis; and
- reporting structure/requirements.

Numerous other resources are available to support district leadership in the design of an appropriate program evaluation plan for the district. Examples include:

- *Basic Guide for Program Evaluation* (managementhelp.org)—provides a description of three types of evaluations with supporting questions to assist in evaluation design;
- *Program Evaluation Plan, Commission on Accreditation* (www.cahiim.org)—provides an evaluation plan and a template for evaluation;
- *Framework for Program Evaluation* (www.cdc.gov)—provides a framework for the program evaluation process and outlines steps; and
- *Evaluating the Impact of Educational Programs* (www.fsis.usda.gov)—provides a framework for formative and summative program assessment using process-, impact-, and outcome-based evaluation tools and includes a flow chart of the steps for the evaluation process.

An overall report summarizing the evaluations being performed in the district each year will provide important information to stakeholders, including the board, staff, and community.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 2: EDUCATIONAL SERVICE DELIVERY							
8. Develop and implement a comprehensive curriculum management plan.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9. Develop and implement a comprehensive gifted and talented program to meet the instructional needs of identified students.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
10. Develop and implement a comprehensive professional development plan to meet the continuing education needs of all teaching staff.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
11. Review existing policy related to the location of the grade nine students. Solicit input from the community, including students, to determine if the current campus configuration is consistent with the wants and needs of the community, and whether the current configuration is in the best interest of these students both academically and developmentally.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12. Develop a systematic plan for formal program evaluation.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 3
FINANCIAL MANAGEMENT

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 3. FINANCIAL MANAGEMENT

An independent school district's financial management function administers a district's financial resources and plans for its priorities. Administration may include budget preparation, accounting and payroll, administrative technology, tax appraisal and collection, and auditing. Planning may include aligning a district's budget with its district and campus priorities, allocating resources, and developing a schedule with milestones.

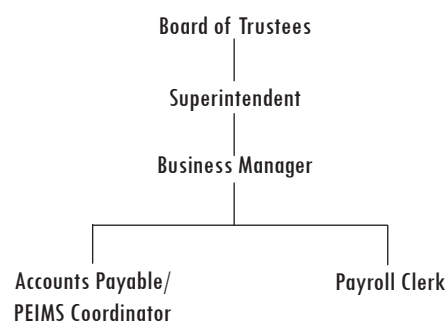
Financial management is dependent on a district's organizational structure. Larger districts typically have staff dedicated to financial functions, while smaller districts have staff with multiple responsibilities. Budget preparation and administration are critical to overall district operations. Financial management includes budget development and adoption, oversight of expenditure of funds, and involvement of campus and community stakeholders in the budget process. Managing accounting and payroll include developing internal controls and safeguards, reporting of 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. Texas state law requires all school districts to have an external auditor review the district's compliance with established standards and practices. The audit provides an annual financial and compliance report, an examination of the expenditure of federal funds, and a report to management on internal accounting controls.

The Presidio Independent School District (ISD) Business Office is responsible for the financial management functions of the district. The office is staffed by a business manager, a payroll clerk, and an accounts payable/Public Education Information Management System (PEIMS) coordinator. Both the payroll clerk and accounts payable/PEIMS coordinator report directly to the business manager, who reports to the superintendent. The business manager is responsible for: monthly financial reporting; budget preparation and control; financial projections; cash flow projections and budget control reporting at the function level; and preparation of all reports for approval by the board of trustees (board). The payroll clerk is responsible for: paying employees; and payment of related withholdings, taxes, retirement, employee plan contributions, medical insurance, and various employee withholding

contributions. The payroll clerk is also responsible for coding pay to fund, function, and object, along with coding pay across funds for general fund and federal fund payroll expenditures, preparation of payroll tax reports, W-2 forms, retirement plan contribution reports, employee medical insurance enrollment, and payments. The accounts payable/PEIMS coordinator is responsible for: proper payment of all expenditures; proper coding of expenditures to correct fund, function, and object; and further coding details to allocate expenditures down to the specific classroom level. The accounts payable/PEIMS coordinator ensures that expenditures are properly authorized, documented, and canceled to prevent double payment, and that there is an adequate budget balance before expenditures are authorized. The PEIMS coordinator is also responsible for submitting all PEIMS and electronic reports to the Texas Education Agency (TEA).

The organization for the district's financial management function is shown in **Figure 3-1**.

FIGURE 3-1
PRESIDIO ISD ORGANIZATION FOR FINANCIAL
MANAGEMENT
SCHOOL YEAR 2013-14



SOURCE: Presidio ISD Administration and staff interviews. December 2013.

Presidio ISD earned a Financial Integrity Rating System of Texas (FIRST) rating of “Standard Achievement” in school year 2011–12 and a rating of “Superior Achievement” in school years 2009–10 and 2010–11. However, in Presidio ISD's Financial Allocation Study for Texas (FAST), the Texas Comptroller of Public Accounts (CPA) assigned the district a rating of two out of five possible stars. The FAST rating is a

combination of a spending index and a composite progress percentile based on student performance. The district’s FAST spending index, the ranking of per-pupil spending compared to the district’s fiscal peer group and adjusted for regional wage differences, is “Very High.” Its composite progress score, the composite ranking of student math and reading progress, is “Average Relative Progress.” This combination of average progress and high spending resulted in the two-star rating.

Following a 2004 TEA governance investigation, which found financial irregularities and academic, capital, and personnel needs, Presidio ISD worked to increase fund balances to address first the district’s academic, capital, and personnel needs. For this seven-year period, ending fund balances were significantly increased, and a high balance of \$28.3 million was reached at the end of fiscal year 2010. At this time, the board of trustees (board) and administration initiated planned improvements to the district’s classroom buildings and general infrastructure as well as hiring personnel to better meet the needs of students. **Figure 3–2** shows the general fund balance for fiscal years 2004 to 2012.

**FIGURE 3–2
PRESIDIO ISD GENERAL FUND BALANCE
FISCAL YEARS 2004 TO 2012**

YEAR	AUDITED FUND BALANCE
2004	\$4,841,462
2005	\$8,622,295
2006	\$14,564,591
2007	\$20,296,600
2008	\$24,750,934
2009	\$27,683,428
2010	\$28,308,256
2011	\$22,382,341
2012	\$16,556,622

SOURCE: Texas Education Agency, Academic Excellence Indicator System (AEIS) Reports, 2004–11, and Actual Financial Data, 2011–12.

Presidio ISD’s general fund balance was increased through a variety of strategies. According to the superintendent, in fiscal year 2004 the board adopted a plan to increase the fund balance through structured management practices. For example, the district began using federal funds rather than general fund revenue to pay for employee salaries and other allowable expenditures. In fiscal years 2005 and 2006, the most significant increase in fund balance was due to the \$2.8

million gain from the statutory revisions affecting districts in an Option 4 weighted average daily attendance (WADA) agreement, as well as an additional \$3.2 million resulting from the implementation of an Option 4 instructional technology agreement.

Presidio ISD’s former WADA sharing agreement with Andrews ISD resulted in significant revenue for the district. The Texas Education Code, Chapter 41, establishes a limitation on local M&O property tax revenue above a statutorily determined level of property wealth per student in WADA, referred to as the Equalized Wealth Level (EWL). This limitation is an effort to ensure that school districts have substantially equal access to revenue to fund operating costs, regardless of the relative value of property included in a given school district’s tax base. School districts with property wealth per WADA in excess of the EWL are required to reduce their wealth through one of five options available in statute.

The most common method for reducing wealth is to remit payments of local revenue generated on property value above the EWL to the state, referred to as recapture. Another option available to districts is to enter into agreements with school districts with property wealth per WADA that is below the EWL; this option funds a portion of the receiving district’s operating cost, and it is commonly referred to as Option 4 or “selling” WADA. Presidio ISD benefited from a WADA sharing arrangement with Andrews ISD and through the two districts’ technology consortium agreement, Presidio ISD designated these funds specifically for technology improvements. Although the revenue sharing has expired, the remaining funds in the Presidio ISD restricted fund balance are restricted to spending on technology.

By voting in 2007 to adopt the highest maintenance and operations (M&O) rate allowed by law, the district secured additional state revenue in addition to higher local tax revenue for an estimated increased revenue of \$1.2 million that year and each year thereafter. The district tax rates for M&O and Interest and Sinking Fund, which is used to pay for debt incurred as a result of construction, remain higher than the state average. Tax rates are shown in **Figure 3–3**, along with state averages.

Also during the period in which Presidio ISD increased its fund balance, state funding formulas were favorable to the district. The district’s improved Foundation School Program (FSP) allocation in the years immediately following tax compression was due largely to local taxing behavior and the

FIGURE 3–3
PRESIDIO ISD TAX RATES COMPARED TO STATE AVERAGE
RATES
CALENDAR YEARS 2003 TO 2011

	PRESIDIO ISD MAINTENANCE AND OPERATIONS	STATE AVERAGE MAINTENANCE AND OPERATIONS	PRESIDIO ISD INTEREST AND SINKING	STATE AVERAGE INTEREST AND SINKING
2003	1.487	1.447	0.227	0.105
2004	1.500	1.447	0.207	0.112
2005	1.500	1.457	0.203	0.112
2006	1.370	1.333	0.201	0.119
2007	1.170	1.042	0.200	0.145
2008	1.170	1.052	0.233	0.157
2009	1.170	1.058	0.241	0.164
2010	1.170	1.064	0.241	0.171
2011	1.170	1.068	0.241	0.176

SOURCE: Texas Education Agency, AEIS, District Performance Profile, Calendar Years 2003 to 2011.

subsequent benefit from yield increases. Furthermore, increases in FSP entitlement would have been attributable to formula increases through 2010–11.

A comparison of state revenue and district expenditures shows distinct differences between Presidio ISD and four peer districts whose size and demographics closely align to Presidio ISD. Identified peer districts include Santa Rosa, Tornillo, Monte Alto, and Muleshoe Independent School Districts. During the fiscal year ending August 31, 2012, Presidio ISD received \$13.3 million in state funding. The state revenue for the four peer districts was an average of \$8.6 million, or 35.3 percent less than Presidio ISD. Also, expenditures for the 2011–12 fiscal year were \$22.0 million for Presidio ISD, compared to the average in the peer group of \$9.7 million or 55.8 percent more than the peer group average.

The high level of expenditures occurred because, as fund balances increased, the district addressed the 2004 TEA report findings related to academic, capital, and personnel needs. For instance, when the fund balance was at a high level, funds were used to make improvements to district heating, ventilation, and air conditioning (HVAC) systems; electrical systems; and other areas impacting energy efficiency. Additionally, improvements in insulation, control of thermostats, and energy-efficient lighting decreased district energy costs. Communications, security, and fire alarm systems were installed districtwide. New buses were

purchased, and improvements in technology were realized. The construction of the new elementary campus was also completed. All of these improvements were completed without issuing new debt. As shown in **Figure 3–4**, this difference in spending on capital improvements continued in 2011–12.

In addition to high levels of spending on facilities, during this period Presidio ISD increased spending on academics and personnel, the other areas mentioned in the 2004 TEA report. As shown in **Figure 3–5**, the district per-pupil spending on instruction was lower than the state average until 2007–08. After small increases in the amount spent on instruction between 2002–03 and 2006–07, the district increased spending by more than \$1 million in 2007–08 and again in 2008–09 and 2009–10. The district rating in the state accountability system was Academically Acceptable from school years 2002–03 to 2006–07. Presidio ISD was rated Recognized in 2007–08 and 2008–09, and in 2009–10 the rating returned to Academically Acceptable. Academic changes during this period included: establishing a district curriculum; adding science labs and teachers; implementing a Newcomers program for students entering U.S. schools for the first time; authorizing new aide positions to serve as parent liaisons; establishing two alternative education programs for school credit recovery; and authorizing after-school and Saturday tutoring for all students determined to be academically at-risk.

A gradual reduction in fund balance occurred as funds were expended for improvements in facilities and instruction. As shown in **Figure 3–2**, these expenditures reduced the fund balance to the 2012 balance of \$16,556,622, of which \$5,683,394 was restricted to spending on technology. In 2012, \$3,528,340 was committed by the board for construction, and \$5,600,000 was committed to other purposes, including salary increases, and \$1,244,888 was unassigned. The board has the power to commit funds or make changes to the commitment, and the superintendent has authority to direct unassigned funds.

The superintendent and board have followed their plan to address district deficiencies, and they acknowledge that spending on facilities and infrastructure is complete. Deficit budgets that have occurred during the past two years were a part of that plan, and the superintendent and board do not anticipate future budget deficits. Reduced spending on construction projects will greatly contribute to a balanced budget; however, close management of expenditures in all other areas will be necessary to develop and manage a

FIGURE 3–4
PRESIDIO ISD GENERAL EXPENDITURES COMPARED TO PEER DISTRICTS
FISCAL YEAR 2011–12

	SANTA ROSA ISD	TORNILLO ISD	MONTE ALTO ISD	MULESHOE ISD	AVERAGE OF PEERS	PRESIDIO ISD	VARIANCE (PRESIDIO ISD COMPARED TO PEER AVERAGE)
Instruction	\$4,350,804	\$4,940,487	\$3,318,804	\$6,147,115	\$4,689,303	\$8,122,633	\$3,433,330
Instructional Resources and Media Services	80,885	65,542	126,180	168,514	110,280	172,911	62,631
Curriculum and Instructional Staff Development	0	48,694	25,833	51,553	31,520	182,440	150,920
Instructional Leadership	0	209,486	75,286	212,116	124,222	442,930	318,708
School Leadership	472,532	565,237	460,735	841,339	584,961	893,810	308,849
Guidance, Counseling and Evaluation Services	249,183	62,514	135,876	225,926	168,375	167,981	(394)
Social Work Services	0	0	0	0	0	123,944	123,944
Health Services	111,102	72,781	93,898	163,953	110,434	211,218	100,784
Student (Pupil) Transportation	264,459	348,514	140,556	530,964	321,123	405,705	84,582
Food Services	744,739	769,277	602,843	41	529,225	1,072,946	543,721
Extracurricular Activities	775,976	309,619	203,511	602,842	472,987	657,356	184,369
General Administration	653,237	1,173,997	422,184	549,605	699,756	940,892	241,136
Facilities Maintenance and Operations	1,549,077	1,429,459	822,094	1,219,937	1,255,142	2,014,336	759,194
Security and Monitoring Services	63,556	125,731	82,363	7,654	69,826	342,673	272,847
Data Processing Services	165,738	271,715	45,915	32,544	128,978	273,116	144,138
Community Services	0	7,927	5,876	455	3,565	2,194	(1,371)
Principal on Long- Term Debt	97,520	58,000	0	0	38,880	0	(38,880)
Interest on Long- Term Debt	99,613	36,880	0	0	34,123	0	(34,123)
Bond Issuance Cost and Fees	0	0	0	0	0	0	0
Facilities Acquisition and Construction	439,987	0	318,301	198,236	239,131	5,819,741	5,580,610
Payments to Fiscal Agent/Member Districts of SSA	39,587	0	185,990	112,037	84,404	97,862	13,458
Payments to Juvenile Justice Arrangements	0	0	0	8,523	2,131	0	(2,131)

FIGURE 3–4 (CONTINUED)
PRESIDIO ISD GENERAL EXPENDITURES COMPARED TO PEER DISTRICTS
FISCAL YEAR 2011–12

	SANTA ROSA ISD	TORNILLO ISD	MONTE ALTO ISD	MULESHOE ISD	AVERAGE OF PEERS	PRESIDIO ISD	VARIANCE (PRESIDIO ISD COMPARED TO PEER AVERAGE)
Other Intergovernmental Charges	9,446	0	19,450	87,911	29,202	66,442	37,240
Total Expenditures	\$10,167,441	\$10,495,860	\$7,085,695	\$11,161,265	\$9,727,568	\$22,011,130	\$12,283,562

SOURCE: Texas Education Agency, Annual Financial Reports for the Year Ended August 31, 2012.

FIGURE 3–5
PRESIDIO ISD ACCOUNTABILITY RATING AND TOTAL OPERATING EXPENSES FOR INSTRUCTION
COMPARED TO STATE AVERAGE
SCHOOL YEARS 2002–03 TO 2010–11

SCHOOL YEAR	DISTRICT ACCOUNTABILITY RATING	DOLLAR AMOUNT SPENT ON INSTRUCTION (PRESIDIO)	TOTAL OPERATING EXPENDITURES PER STUDENT (PRESIDIO)	TOTAL OPERATING EXPENDITURES PER STUDENT (STATE)	INSTRUCTION PER STUDENT (PRESIDIO)	INSTRUCTION PER STUDENT (STATE)
2002–03	Academically Acceptable	\$5,583,314	\$7,965	\$7,708	\$3,903*	\$4,096*
2003–04	Academically Acceptable	\$5,694,178	\$6,546	\$7,084	\$3,756	\$4,103
2004–05	Academically Acceptable	\$6,050,093	\$6,439	\$7,229	\$3,822	\$4,176
2005–06	Academically Acceptable	\$6,175,209	\$7,018	\$7,466	\$4,136	\$4,294
2006–07	Academically Acceptable	\$6,430,682	\$7,713	\$7,826	\$4,460	\$4,500
2007–08	Recognized	\$7,518,434	\$9,398	\$8,342	\$5,536	\$4,819
2008–09	Recognized	\$8,500,760	\$10,603	\$8,572	\$6,311	\$4,976
2009–10	Academically Acceptable	\$9,692,878	\$11,287	\$8,802	\$6,621	\$5,142
2010–11	Academically Acceptable	\$10,097,703	\$12,789	\$8,717	\$6,935	\$5,061

NOTE: Instruction per student contains instruction and instructional leadership per student.

SOURCE: Texas Education Agency, Academic Excellence Indicator System (AEIS), school years 2002-03 to 2010-11.

balanced budget. As shown in **Figure 3–6**, in school years 2012–13 and 2013–14 budgets, Presidio ISD had deficits in its general fund budget, which were covered by its fund balance.

With the completion of the infrastructure and construction projects, district spending has slowed. Renovation of the administration building will continue as funds become available.

**FIGURE 3–6
PRESIDIO ISD COMPARISON OF FISCAL YEARS 2012–13 AMENDED AND 2013–14 PROPOSED BUDGETS (GENERAL FUND)**

	2012–13		2013–14	
	STATE AND LOCAL REVENUE BREAKDOWN	TOTAL	STATE AND LOCAL REVENUE BREAKDOWN	TOTAL
General Fund Budget		\$22,702,970		\$19,477,679
State Revenue	\$14,264,677		\$13,048,279	
Local Revenue	\$2,156,379		\$2,677,237	
Total Revenue		\$16,421,056		\$15,725,516
Excess (Deficit)		(\$6,281,914)		(\$3,752,163)

SOURCE: Presidio ISD Business Office, Amended and Proposed Budgets (General Fund), Fiscal Years 2012–13 and 2013–14, March 2014.

ACCOMPLISHMENT

- ◆ Presidio ISD developed and implemented a plan to successfully achieve increased district fund balances to complete construction, renovation, and technology infrastructure improvements without accumulation of new debt and without a tax increase.

FINDINGS

- ◆ Presidio ISD lacks a budgeting process that includes all stakeholders and incorporates district/campus goals and improvement plans.
- ◆ Presidio ISD relies heavily on out-of-district consulting resources, which inhibits the efficiency and effectiveness of the district’s business operations.
- ◆ Presidio ISD does not consistently use a process or schedule to manage and evaluate contracted services.

RECOMMENDATIONS

- ◆ **Recommendation 13: Establish a budget development process that starts with stakeholder input on district goals, considers input from campus leadership and staff, and ultimately gives authority to those responsible.**
- ◆ **Recommendation 14: Develop, implement, and evaluate a plan for continued professional development for Business Office staff, and eliminate the business and finance external consultants by 2018-19.**
- ◆ **Recommendation 15: Develop a process to review and evaluate contracted professional services.**

DETAILED ACCOMPLISHMENT

FUND BALANCES

Presidio ISD developed and implemented a plan to successfully achieve increased district fund balances to complete construction, renovation, and technology infrastructure improvements without accumulation of new debt, although the district did increase its tax rates.

Since 2000, Presidio ISD has implemented a strong financial plan that resulted in significant increases in the district’s general fund balances. During a three-year period, fund balances increased from \$8.6 million in 2005 to approximately \$20.3 million in 2007. The district’s highest balance of \$28.3 million was realized during the 2009–10 fiscal year. The superintendent reported that such significant increases were realized as a result of these district actions:

- successfully appealing Comptroller of Public Accounts-assigned values for 2001, 2003, and 2004, resulting in an increase in funding of \$167,678;
- renewing and renegotiating its contract with Marfa ISD during fiscal year 2004–05 regarding the transfer of 30 Redford students into Presidio ISD. A net gain of \$79,000 was realized that year and each year thereafter;
- increasing the local tax rate to the state cap of \$1.50 for fiscal years 2005 and 2006, netting the district an additional \$450,000 in matching state guaranteed yield allotment for school years 2004–05 and 2005–06. Funding formulas changed in school year 2006–07, which lowered the cap to \$1.03;
- working with state legislators to amend statute to authorize the inclusion of any profit resulting from

an Option 4 WADA agreement during fiscal year 2005–06. This provision required the revenue from the Option 4 WADA agreement to be included in the calculation necessary to maintain the same level of funding from the previous year. These provisions prevented the loss of approximately \$2.8 million in state revenue annually from that point forward, as long as target revenue funding continued;

- developing an Option 4 WADA agreement for \$3.2 million with Andrews ISD for school year 2005–06 for use in instructional technology.
- negotiating new water and sewer rates with the city of Presidio in 2007, reducing cost to the district by \$8,600;
- voting in 2007 to adopt an M&O rate of \$1.17, the highest allowed by law. The net result was additional funding of almost \$1.2 million that year and each year thereafter;
- refunding/refinancing \$8.2 million in bonded debt in school year 2006–07, resulting in a savings to the district of \$1.5 million in interest cost;
- securing state and federal grants, including the Comprehensive School Reform grant, for an award amount of \$36,000 between 2008 and 2010. The Investment Capital Fund grant provided an additional \$300,000;
- pursuing \$733,952 in state facilities funding that resulted from the TEA’s interpretation of eligible debt in 2011–12; and
- managing federal entitlements more effectively and utilizing allowable assignments of personnel that had been previously funded with the district’s general fund revenue.

The increased fund balance was due to an intentional plan on the part of the district to accumulate the funds necessary to improve infrastructure and facilities and add to district personnel to improve student academic performance. Presidio ISD’s proactive and early approach to maximize funding was a model for many school districts.

Each of these efforts demonstrates a commitment to manage the district’s resources in an efficient and productive manner. As the district’s fund balance increased, the administration

and board made the planned improvements to the district’s buildings and infrastructure without incurring new debt.

DETAILED FINDINGS

BUDGETING PROCESS (REC. 13)

Presidio ISD lacks a budgeting process that includes all stakeholders and incorporates district/campus goals and improvement plans.

Presidio ISD has a general budget calendar, as shown in **Figure 3–7**. However, campus leadership and staff focus group members were challenged to articulate specific detail

**FIGURE 3–7
PRESIDIO ISD BUDGET SCHEDULE
FISCAL YEAR 2012–13**

ACTIVITY DATE	ACTIVITY TASK
February 23-March 5	Budget request forms should be given to teachers.
March 9	Pupil/staff projections should be completed.
March 19	Teacher assignments and new position recommendations submitted to superintendent and business manager.
March 20	Budget requests are due to principals.
March 30	Campus/department budgets due to business manager. Staff lists including assignments must be submitted.
April 1	The 2011–12 General Fund budget will be closed.
April 2	Campus/department budgets due to business manager. Staff lists including assignments must be submitted.
May 4	Proposed 2012–13 budget is due to the superintendent.
May 00	Tax Valuation Estimate will be requested from the Presidio County Appraisal District.
May 31	The 2011–12 federal funds budgets will be closed.
July 17	A budget work session with the board will be held.
July 25	The Appraisal District Certified tax roll is due from the Appraisal District.
August 2	The Notice of Public Meeting to Discuss Budget and proposed tax rate will be published.
August 20	The 2012–13 Presidio ISD budget will be presented to the board for approval.

SOURCE: Presidio ISD Business Office, Budget Schedule, 2012–13.

regarding the development of the budget. Interviews indicated that discussion relative to long-term perspective and broad organizational goals was not a priority.

The district budget development schedule shows the initial budget preparation beginning in March with projections of student enrollment and required staffing needs. This budget schedule showed work being done at all levels, including teachers, department heads, principals, and central office each month until the final budget adoption by the board in August. Data from staff interviews indicated, however, that the majority of this work actually takes place in the district's central administration office.

When asked to describe the budget development process, campus principals consistently reported that they were aware of an overall budget but did not have input into budget details. Furthermore, interviews with the superintendent, principals, and staff members indicated a concern with the lack of parental involvement in budget development.

Campus administrators were clear that they were seldom refused a purchase requisition, as long as they could justify the request. They also reported that there was an overall understanding that each campus budget should be reduced by 10 percent for the budget year 2013–14. Specific details regarding the 10 percent reductions were not clear. Overall, there was little evidence these requests were influenced by district/campus improvement plans.

The campus principals indicated that they had begun to use the Texas Enterprise Information System (TxEIS) accounting system to submit purchase requisitions. This process was beginning to provide more preliminary budget information than in past years. However, because the TxEIS system budget modules are not fully utilized, there continues to be a degree of confusion regarding changes in the monthly budget balances. Decisions to make changes to the campus budgets occur in the district's central administration office, and principals were unable to explain why their campus budgets were amended.

Discussion with the community via the campus improvement team, which consists of district and community stakeholders, parent/teacher groups, and the board, does not occur throughout the budget development process. A budget process that does not include all stakeholders and incorporate district/campus goals and improvement plans does not necessarily assess community needs, identify all opportunities, and develop broad goals.

The current district budgeting process, which relies heavily on district administration priorities and decisions, means that the district does not have the benefit of broader stakeholder input and buy-in for budget decisions. The Government Finance Officers Association publication, *Recommended Budget Practices: A Framework for Improved State and Local Government Budgeting* (1999), identifies elements of the budget process that are built on a foundation of broad goals based on community needs, priorities, challenges, and opportunities. In effective districts, after stakeholder input on annual district goals is gathered, approaches to achieving those goals are often developed by district administration. The district budget is then drafted at the campus level based on the approaches for achieving goals, and evaluations conducted as part of periodic input and future budget development. These elements provide a structure in which district leadership can involve and promote effective communication and decision making with community stakeholders.

Figure 3–8 compares Presidio ISD budgeting practices to industry standards.

The lack of consistent budget management practices has resulted in frustration for the principals and their principal-designated campus budget managers. Principals are given considerable responsibility for student academic performance yet are given limited control of resources needed to realize improvements. While teachers and principals agreed that they seldom were denied a request, the uncertainty, lack of coordination, and inefficiency related to budgeting was a distraction.

Campus and district improvement teams are primary stakeholders in district budgeting processes. The goal of improved student achievement drives the decision making of these campus committees, and budgeting decisions are an essential tool in planning and evaluation. The quality of the decision-making process depends largely on the organization budget process and the district's leadership commitment to the budget process. Many opportunities for participation and communication in the process could occur at all levels, particularly the campus level. Involvement of the campus and districtwide improvement teams and their decisions regarding personnel, programs, and the budget could be well-documented and reported to the board and administration.

The TEA *Financial Accountability System Resource Guide* (FASRG) has specific recommendations that school districts

**FIGURE 3–8
PRESIDIO ISD BUDGETING ACTIVITIES COMPARED TO INDUSTRY STANDARDS**

TASK	STANDARD	PRESIDIO ISD PRACTICE
Goal development	Goals developed by board and superintendent with input from community.	Board and superintendent develop goals informally.
Develop approaches to achieve goals	Superintendent and board work together to develop approaches for achieving goals.	Superintendent develops approaches.
Budget request form completion	Campus improvement team meets and has full discussion related to campus goal development aligned with district goals, teacher assignment, and new position recommendations.	Teachers receive request form but give little or no input.
Principal review of campus budget	After discussion with the campus improvement team, principals present their budget proposal to the district improvement team.	Principals have brief review.
Business manager review	Occurs as a part of district improvement team process.	Major decisions made by business manager.
Superintendent review	Incorporates district improvement team and business manager feedback and is then presented to the school board.	Major decisions reviewed by superintendent.
Public comment period	Board requests public input to budget.	Little input for public comment.
Board adoption of budget	Board adopts budget.	Board adopts budget.
Budget amendments	Changes input by principal to TxEIS.	Changes input at district level.

SOURCE: Presidio ISD Review Team, March 2014.

could incorporate into the budget development process. Budgeting is defined as three phases: planning, preparation, and evaluation. The guide discusses the advantages of site-based budgeting:

“The main advantage of site-based budgeting is that it allows school personnel to make budgetary decisions for their own campuses. Thus, those who best understand student needs at the campus level plan how funds are used to meet them. This decentralization of budgetary authority may also be a means of increasing school accountability. Another potential advantage of site-based budgeting is increasing the level of participation of both campus staff and parents in budget development. Many site-based budgeting systems create committees composed of campus staff, parents, and other community members to determine campus budgetary allocations. These committees give parents and other community members a voice in school budgeting from its inception, rather than merely when the budget is presented for public review by the district board.”

Presidio ISD should establish a budget development process that starts with stakeholder input on district goals, considers input from campus leadership and staff, and ultimately gives authority to those responsible.

The district should revise its budget process by beginning with community input through the board, and continue with a district budget calendar by comparing the existing calendar to the Budgeting Module of the *FASRG*. Board approval of this calendar will ensure commitment and accountability as well as board understanding of the importance of the site-based decision-making processes. The superintendent should work with and train principals and campus leadership to understand successful site-based budgeting. Campus improvement teams should be fully involved in early stages of budget development. The district improvement team and campus principals should make final decisions. Additional staff training to promote a strong relationship with the Business Office and campus leadership should also be incorporated in the calendar, again utilizing portions of the *FASRG* budget module. In addition, the district should evaluate opportunities to fully utilize its TxEIS budgeting module.

The use of a clearly developed site-based budgeting process based on community input and fully incorporating employee input is essential in the site-based budget effort. The calendar should include activities and processes, target dates, and responsibilities. The superintendent should direct the Business Office to prepare detailed budget information and provide training necessary for principals to understand and

successfully carry out their roles and responsibilities in site-based budgeting. Adequate training should be provided for campus improvement teams and principals, especially in the use of administrative software. The superintendent should provide regular board updates indicating progress toward implementation of the improved budget process.

This recommendation could be implemented with existing resources.

Since the review, the school district reports that campus and district improvement plans have been updated and laid out in the format required by TEA, with each goal and subtopic in the district/campus goals and improvement plans tied to the budgeting process. In addition, district officials advised that principals have control over allocating their campus budgets. This includes principals, with the help of other campus administrators, being told to refer their budgets to the campus quality team or site-based committee, which include parent and community membership.

FINANCIAL SERVICES (REC. 14)

Presidio ISD relies heavily on out-of-district consulting resources, which inhibits the efficiency and effectiveness of the district's business operations.

The district contracts with two external consultants to assist the superintendent and business manager with management of its finance and business operations. Since 2007, the district has contracted with a specialist in school finance revenue projection and adjustments. The contract includes these services:

- providing consultation on school finance matters to the superintendent and/or his/her designee(s) of the Presidio ISD via telephone, e-mail, and/or fax;
- providing finance training to the superintendent and/or his/her designee(s) of Presidio ISD;
- providing periodic and timely e-mail updates on school finance issues to the superintendent and/or his/her designee(s) of Presidio ISD;
- providing technical support and assistance to the superintendent and/or his/her designee(s) on state and local, not federal and/or grant-related, school finance, revenue-related issues, including any Option 4 partnership agreements(s);
- providing advocacy and intervention for, and on behalf of, the district with the TEA and/or other

rule-making/regulatory entities as needed and as requested;

- serving as a registered provider of annual school board training(s) that meets Texas Administrative Code requirements;
- using the school district's financial data for testing and modeling purposes in revisions to the state funding template;
- reporting to the board on matters regarding the district's finances as often as quarterly but no less than three times annually; and
- providing other or related services on which school district and consultant may from time to time agree.

The district has also contracted with another specialist in the area of school finance services. The contract includes these services:

- providing consultation on school finance matters to the superintendent and/or his/her designee(s) of Presidio ISD via telephone, e-mail, and/or fax;
- providing technical support and assistance to the superintendent and the business manager and/or his/her designee(s) on matters related but not limited to:
 - budget (preparation, amendments, coding);
 - cash flow/investments;
 - general ledger (opening and adjusting entries);
 - preparation for the annual external audit;
 - payroll (salary calculation, monthly, and quarterly reports);
 - purchasing/bidding processes;
 - federal funds management;
 - cafeteria applications, claims, and reports;
 - risk management (property/casualty, worker and unemployment compensation, and health insurance);
 - Public Education Information Management System (PEIMS) reporting/submissions;
 - school board elections; and
 - reporting deadlines.

In 2012–13, Presidio ISD paid these two consultants \$85,746. The services listed are all responsibilities found in a general business manager's job description and are the work of a school district's Business Office. The current business manager has been in her position since 2008. The business manager supervises, trains, and evaluates the Business Office staff. All three employees in the Business Office have worked at various positions within the district for at least 10 years each. Their tenure with the district gives them added insight and familiarity with districtwide operations. All three are continuing to develop their knowledge and skill level at their positions.

District Business Office staff currently attends annual training for advanced PEIMS use, activity fund accounting, and investment training. They do not attend training in areas such as budgeting, payroll, cash flow and investments, and general ledger management.

As with all school districts, the expertise and ability to manage district functions requires adequate training and support. However, reliance on outside consultants may be inhibiting the development of the district personnel's expertise.

The business manager and staff in a small, rural district often benefit from being well-versed in all aspects of school finance. The District Administration Training Guide provided by Regional Education Service Center XVIII (Region 18) provides necessary framework for Business Office training. The district is a member of Region 18, as well as the Texas Association of School Business Officials (TASBO). Without staff training, the district is challenged to ensure emphasis and focus on the district being self-sufficient and less dependent on external consultants. Without training related to budget development, financial planning, and calculation of state aid, it is difficult for the Business Office to operate in a more efficient manner.

The district should develop, implement, and evaluate a plan for continued professional development for Business Office staff, and eliminate the business and finance external consultants by 2018–19.

To decrease the need for external consultants, Presidio ISD should design a training plan for all Business Office staff based on specific roles and responsibilities. The goal of the plan should be a gradual reduction in reliance on external financial services. Professional development should be provided to train current staff to fully utilize the district's

accounting system and manage all aspects of the Business Office with little reliance on consultants.

Professional training from existing business and finance external consultants, along with support from Region 18 provided through current service center commitment contracts, should be utilized for employees to gain the level of expertise needed to stand alone in all business operations. With improved business procedures and continued training, the current Presidio ISD Business Office staff should develop knowledge and skill levels necessary to effectively manage all district business office functions.

During the transition to self-reliance, the district may wish to take advantage of cost-effective solutions offered by Region 18 or other similar entities for districts looking to outsource Business Office functions.

In addition to support offered through Region 18, as a TASBO member, the district could also rely more on training sessions offered by that organization. TASBO has numerous workshops and seminars for school business administrators. Specific titles include: Budget Academy, Federal and State Funding Compliance Workshop, How PEIMS Affects Budgeting, Financial Review of DIP and CIPs, Developing a Fiscal Manual, Investment Training, Contract Management Procedures, and Audit Findings. Membership provides exposure to best practices and opportunities to become more skilled and effective in school finance and operations. In addition, member benefits include conferences, academies, workshops, webinars, online education courses, mentoring/networking, *TASBO Report Magazine*, TASBO newsletters, buyers guide, and educators' professional liability insurance option.

The superintendent should lead the district from reliance on external consultants by requiring a specified level of annual training for all Business Office staff that builds district capacity and expertise to manage business functions. Cross-training of Business Office staff will also provide consistency across years and help ensure independence in future years.

Training for Business Office staff should be ongoing with funding committed to annual training activities.

Costs for TASBO seminars range from \$70 to \$260. With continued emphasis on professional training by spending approximately \$8,000 for the next four years, costs can eventually be reduced from the current expense of \$85,746 to \$4,000 annually to maintain necessary levels of expertise. A gradual reduction in reliance on external consultants will

balance the cost and may be accomplished within four years, eventually saving the district \$81,746 per year.

CONTRACTED SERVICES (REC. 15)

Presidio ISD does not consistently use a process or schedule to manage and evaluate contracted services.

Presidio ISD has maintained long-term relationships with several providers of professional services in the areas of ongoing management of district finances, architectural/engineering services, instructional technology services, and the district’s annual financial audit. However, for long-term contracts, the district lacks a methodology to regularly evaluate the services and rates. For example, Presidio ISD has maintained a long relationship with an Austin-based architectural firm, which has provided all district architectural services for the past 10 years. During this time, significant building and construction projects occurred. In addition, the district recently completed energy-saving projects. These projects were ongoing and were all developed and supervised by an Austin engineering firm. Finally, the district has employed a Lubbock accounting firm to perform its annual external audit for the previous nine years. As shown in **Figure 3–9**, Presidio ISD spent more in school year 2011–12 on auditing services than any peer district but Tornillo ISD, and more than any peer district on other professional contracted services. There was no evidence that the district has a schedule to review and manage the amount of expenses for these services.

The Texas Government Code Section 2254.003 states that professional services providers may be selected based on competence, qualifications and for a fair and reasonable price, and not based on a competitive bid. However, continued use of existing professional services companies without evaluation leaves established partners with little incentive to demonstrate quality of service or cost-effectiveness. Thus, Presidio ISD cannot ensure that its primary contractors are offering competitive services/prices.

Regular evaluation of contracted services provides effective districts with evidence of the board’s careful consideration when investing taxpayer funds and encourages community confidence in the board and administration.

The Government Finance Officers Association (GFOA) issued a best practice white paper called *Audit Procurement* in 2002 (www.gfoa.org). The GFOA recommends that governmental entities “enter into multi-year agreements of at least five years in duration when obtaining the services of independent auditors.” The GFOA states that multi-year agreements can provide continuity, lessen disruption, and reduce audit costs. However, the GFOA further states that “ideally, auditor independence would be enhanced by a policy requiring that the independent auditor be replaced at the end of the audit contract.” Effective districts apply this same approach to other contractual agreements, such as those with architects, engineers, financial advisors, and information technology firms. Just as school districts are required to enter into new bank depository agreements every three years, regardless of change in the depository bank or not, effective districts benefit from reviewing all professional services contracts every three years.

Presidio ISD should develop a process to review and evaluate contracted professional services.

The Presidio ISD board should work with the district administration to ensure a regular evaluation and selection of outside professional services. The board and an administrative team should work together to develop a process to select and rotate professional service providers, such as audit firms, architectural/engineering firms, financial/accounting advisors, and informational technology services. A three-year plan to achieve this goal should be developed and implemented.

This recommendation could be implemented with existing resources.

**FIGURE 3–9
PRESIDIO ISD EXPENSES ON AUDIT AND OTHER PROFESSIONAL SERVICES COMPARED TO PEER DISTRICTS
FISCAL YEAR 2011–12**

FUNCTION CODE	EXPENDITURE CATEGORY	SANTA ROSA ISD	TORNILLO ISD	MONTE ALTO ISD	MULESHOE ISD	AVERAGE	PRESIDIO ISD	VARIANCE
6212	Audit Services	\$22,500	\$43,900	\$14,454	\$16,450	\$24,326	\$38,000	\$13,674
621X	Other Professional Services, Superintendent’s Office	\$17,289	0	0	0	\$4,322	\$80,371	\$76,049

SOURCE: Texas Education Agency, Annual Financial Reports for the Year Ended August 31, 2012.

Since the review, the district reports that staff, administrators and board members have implemented a new procedure for the review of contracted services by the board on an annual basis before the start of the new fiscal year.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 3: FINANCIAL MANAGEMENT							
13. Establish a budget development process that starts with stakeholder input on district goals, considers input from campus leadership and staff, and ultimately gives authority to those responsible.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14. Develop, implement, and evaluate a plan for continued professional development for Business Office staff, and eliminate the business and finance external consultants by 2018-19.	(\$8,000)	(\$8,000)	(\$8,000)	(\$8,000)	(\$4,000)	(\$36,000)	\$0
15. Develop a process to review and evaluate contracted professional services.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	(\$8,000)	(\$8,000)	(\$8,000)	(\$8,000)	(\$4,000)	(\$36,000)	\$0

CHAPTER 4

PURCHASING

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 4. PURCHASING

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

School districts in Texas are required to follow federal and state laws and procedures applicable to purchasing. The purpose of competitive bidding requirements found in the Texas Education Code (TEC), 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.

The Presidio Independent School District (ISD) Business Office is directed by a business manager, who has more than 25 years of experience with two Texas school districts. For the purchasing function, the business manager is supported by an accounts payable clerk, a warehouse receiver (clerk), and a warehouse clerk.

Purchasing activities in the district are decentralized. Purchases are initiated by campus or department employees, approved by administration, and authorized by the business manager. Purchase requisitions are placed by the originating employee, and a purchase order (PO) is routed back to the employee who initiated the purchase. In August 2013, Presidio ISD began issuing POs electronically through the purchase requisition module within the Texas Enterprise Information System (TxEIS), the district's accounting platform. Previously, the district used a manual paper process to issue POs.

Written procurement policies are part of the Presidio ISD Procedural Manual, which is posted on the district's website through the Business Office portal.

Ordered goods, except cafeteria orders, are centrally received at the district warehouse by the warehouse receiver (clerk). The merchandise is recorded in a Web-based Warehouse Delivery Log (WDL) developed by the Technology director. The warehouse clerks have full access to the WDL, whereas

the superintendent, the Maintenance director, and business manager have read-only access. The warehouse receiver (clerk) organizes the merchandise by campus and arranges for delivery. The warehouse clerks are responsible for identifying and tagging fixed assets of more than \$500 before delivery is made. Additional duties carried out by the warehouse clerks include assisting the business office with daily bank runs and assisting with the paperwork regarding new vendors. Cafeteria orders are delivered from the vendors to the campuses.

Campus secretaries receive the merchandise deliveries from the warehouse clerks and sign the WDL as evidence of receipt. The warehouse receiver (clerk) submits the packing slip, the bill of lading, and purchase order to the accounts payable clerk, who inputs information into TxEIS for payment.

Some goods and services are also purchased using hard-copy Payment Authorization (PA) forms in lieu of a PO. PAs expedite the disbursement process for goods and services for which a PO was not issued. While the district does not have a policy or procedures stating when PAs should be issued, in practice, PAs are issued by the Business Office for insurance premiums, service contracts, or salary advances. The accounts payable clerk prepares a PA form and submits it to the business manager for approval.

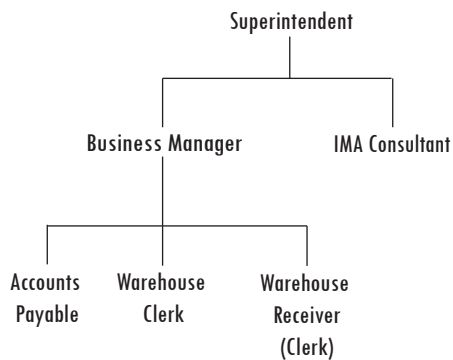
Presidio ISD procures goods and services through local vendors. The Business Office mails bid forms to approximately 300 vendors each year to request discounts on vendor retail price for such goods as maintenance supplies, athletic supplies, vehicle supplies, and office equipment. The board of trustees (board) approves all local vendors. Competitive bid proposals are managed by the superintendent and the technology director.

Presidio ISD outsources the coordination of textbooks and other instructional material to a consultant. The consultant reports directly to the superintendent and is compensated \$36,500 per year by the district. According to the consultant, the district has approximately \$200,000 in the instructional material allotment (IMA) account. The majority of these funds will be used to acquire the upcoming curriculum adoption for mathematics (grades kindergarten through 8), science (grades kindergarten through 12), and technology

applications. The district is moving toward electronic instructional material; the district's goal is to have 85 percent of its instructional material in electronic format in three years.

Figure 4–1 shows the district's purchasing, warehousing, and textbook organizational structure for 2013–14.

FIGURE 4–1
PRESIDIO ISD ORGANIZATION FOR PURCHASING,
WAREHOUSING, AND TEXTBOOKS
SCHOOL YEAR 2013–14



SOURCE: Presidio ISD Organization Chart and staff interviews, November 2013.

ACCOMPLISHMENT

- ◆ Presidio ISD participates in five purchasing cooperatives, which allows access to a greater variety of goods and services while obtaining better pricing and purchasing terms.

FINDINGS

- ◆ Presidio ISD has not fully implemented available technology to make the purchasing process as efficient as possible.
- ◆ Presidio ISD does not have adequate internal controls over its vendor master file.

RECOMMENDATIONS

- ◆ **Recommendation 16: Update purchasing procedures to fully implement the electronic procurement process by approving purchase requisitions using electronic support, eliminating the distribution of hard-copy vendor catalogs and purchase orders, and making links to the cooperative vendor catalogs on the district website.**

- ◆ **Recommendation 17: Establish adequate internal controls for the vendor master file and eliminate duplicate vendor listings.**

DETAILED ACCOMPLISHMENT

MULTIPLE COOPERATIVE PURCHASING AGREEMENTS

Presidio ISD participates in five purchasing cooperatives, which allows access to a greater variety of goods and services while obtaining better pricing and purchasing terms. Using these cooperatives also means, the district spends fewer labor hours on processing bids or requests for proposals for commonly purchased items.

Cooperative purchasing agreements are arrangements for groups of common interest to pool their buying power and obtain lower prices from selected suppliers. The district participates in these cooperative agreements: West Texas Educational Purchasing Cooperative (WTEPC); Regional Education Service Center XVIII (Region 18); West Texas Food Service Cooperative; TexBuy Purchasing Cooperative; and BuyBoard Cooperative Purchasing.

The WTEPC is administered by the Lubbock Independent School District for school districts in West Texas. The cooperative has eight bid categories and a reverse auction for copy paper. A reverse auction is a type of auction in which several sellers offer their items for bidding, and compete for the price which a buyer will accept. The buyer usually has the option to accept any bid or reject all bids.

Region 18 is based in Midland and performs cooperative purchasing services for its members by soliciting “open catalog” bids in three bid categories, which include (1) school and office supplies, instructional materials and furniture; (2) computer hardware, software, supplies and accessories; and (3) physical education and athletic equipment and supplies. Region 18 determines commodities for cooperative purchasing, conducts and awards bids in accordance with the competitive bidding procedures for Texas public schools, and approves vendors.

The West Texas Food Service Cooperative is a multi-regional service that includes school districts, charter schools, and other governmental entities. The cooperative assists participants in administering fiscally sound food service operations while providing nutritious meals. The cooperative operates two components, which include (1) food purchasing; and (2) commodity processing. There is no fee for participation, and districts may join at any time.

TexBuy is a statewide purchasing cooperative administered by Regional Education Service Center XVI (Region 16) in Amarillo. TexBuy has national buying power, as it is the state representative of the national purchasing organization Association of Educational Purchasing Agencies (AEPA).

The BuyBoard Cooperative Purchasing obtains purchasing benefits and efficiencies to pass to members of a cooperative, to comply with state bidding requirements, and to identify qualified vendors of commodities, goods, and services. The Cooperative also relieves the burdens of governmental purchasing by effectively using current technology and realizing economies of scale.

DETAILED FINDINGS

USE OF TECHNOLOGY (REC. 16)

Presidio ISD has not fully implemented available technology to make the purchasing process as efficient as possible. Procedures have not been updated to fully implement and maximize the electronic purchasing system.

In August 2013, Presidio ISD migrated from a manual paper requisition process to the Electronic Requisition module in TxEIS to issue POs. However, the Business Office still requires hard-copy purchase requisition supporting documentation to be submitted before issuing a PO. The Business Office prints out colored copies of the approved PO and sends those copies to the campuses and the warehouse.

In addition, the district participates in five purchasing cooperatives, but the links to the vendor catalogs are not on the district's website. Each year, the Business Office compiles and distributes a binder of vendor catalogs to each campus for employees to use.

The TxEIS purchase requisition approval pathway electronically forwards the requisition to the next authorized approver in sequential order, as defined by the district. Requisitions are initiated by Presidio ISD employees who enter the information—such as product type, quantity, vendor information, and delivery details—and quotes into the TxEIS workflow. The system routes the requisition for approvals to the campus principal, then to the administrator responsible for technology or special education, then to the superintendent, and subsequently to the business manager for final approval. The business manager's approval establishes the PO and number. When POs are issued, the Business Office prints them out and distributes and files hard copies.

Cafeteria purchase requisitions route from the campus to the business manager for approval.

Once the PO is issued, the Business Office prints and retains a copy of the PO on white paper. The yellow- and pink-colored paper PO copies are sent to the campus originator to place the order. The yellow PO copy is given to the vendor in exchange for the goods or services. The pink copy is retained on campus. The goldenrod-colored paper copy is retained by the Business Office in case the original is lost. An additional copy is given to the warehouse receiver (clerk). During school year 2012–13, the district issued approximately 3,450 POs.

The time and effort required to prepare and submit hard-copy purchase requisition supporting documentation to the Business Office, and the manual distribution of the system-generated PO, could delay the procurement process for two to seven days. In the review team's survey of campus staff, 33 percent of the respondents indicated that the purchasing process was cumbersome for the requestor. One respondent stated that "it is nearly impossible to get things in a timely manner from the Business Office."

Time and paper can be saved with the use of technology. Purchase requisition supporting documents can be e-mailed in a Portable Document Format (PDF) file. Purchase orders can be accessed on campus electronically within TxEIS and printed only if needed. Many vendors accept electronic POs and catalogs can be viewed online.

Port Arthur ISD implemented an electronic purchasing process and reports that the "entire electronic purchasing process usually takes the district one day." In addition, other districts such as Marfa ISD and Allen ISD, provide links to their cooperative vendor catalogs on their districts' websites for employees to access.

The district should update purchasing procedures to fully implement the electronic procurement process by approving purchase requisitions using electronic support, eliminating the distribution of hard-copy vendor catalogs and POs, and making links to the cooperative vendor catalogs on the district website.

The district should eliminate the requirement for hard-copy purchase requisition supporting documentation and issue POs based on electronic support. This will involve:

- eliminating hard copies of POs sent to the campuses and warehouse;
- having campus staff access the PO using read-only access;

- making links to cooperative purchasing catalogs available on the district website;
- retaining purchase requisition supporting documentation electronically on campus and providing it via e-mail upon request; and
- providing electronic access to view and print the PO at the campus or warehouse when needed.

Since the review, the district has developed the capability to attach a PDF to the purchase requisition in TxEIS, and hard copies are no longer required.

This recommendation could be completed with current staff in the Business Office and Technology Department.

VENDOR MASTER FILE (REC. 17)

Presidio ISD does not have adequate internal controls over its vendor master file.

Business Office staff have access to the vendor master file (VMF) to set up vendors, change vendor information, and prepare payments. The accounts payable clerk, who is in charge of initiating payment authorization vouchers, also has the access authorization to add new vendors and change vendor information, such as name and remittance address.

The district does not have a written policy or procedures regarding the VMF. In practice, the district will not set up a new vendor in the VMF without board approval and a completed vendor acknowledgement form, FORM CIQ, which discloses conflicts of interest. However, the district does not have a written policy or procedures regarding who has access to the VMF, data entry requirements to ensure consistency, or requirements to periodically review and update the VMF. As a result, the VMF is not periodically checked and contains 3,458 vendors, 49 of which have duplicate entries. For example, there are 15 unique vendor numbers for the same financial company, and three unique vendor numbers for Presidio County.

Failure to implement adequate controls over the VMF could result in erroneous or duplicate payments, uncashed checks, unapplied credits, tax reporting errors, and even potential fraud.

Vendor master files are an integral component of accounts payable and purchasing internal controls. Well-maintained VMFs help prevent internal control failures, inefficiencies, and inaccurate management reports. TxEIS includes a Vendor Listing report that allows Presidio ISD to identify

expenditures of more than \$50,000; those expenditures are required to be bid in accordance with TEC, Section 44.031 (a)(b). However, the report is an inaccurate and inefficient management tool because it contains duplicate vendor listings from the VMF. For example, a review of the district's Vendor Listing shows that Presidio ISD paid a vendor \$127,448.60, but the Vendor Listing report shows payment by Presidio ISD with two checks that comprise the total of \$127,448.60, with one for \$118,504.85 and another for \$8,943.75. Additionally, misappropriation of assets could occur when multiple vendor names and addresses are used for the same vendor. Legitimate invoices could be paid multiple times to the same vendor but named as different listings in the VMF.

TEA's *FASRG*, Section 1.5.4.6, recommends segregation of duties and limited access to the VMF for employees authorized to make changes. Additionally, *Accounting Controls* by Steven M. Bragg, CPA, recommends establishing a vendor naming convention to ensure consistency and to reduce the risk of establishing a new listing for an existing vendor.

The district should establish adequate internal controls for the vendor master file and eliminate duplicate vendor listings.

To establish controls for the VMF, the function of adding vendors or changing vendor information such as name, address, and bank information should be properly segregated from the function of initiating purchase requests and vendor payments. The business manager should be the only individual who has access to add or change vendor information. The district should establish the following controls over the VMF to ensure that it is adequately maintained:

Determine when multiple vendor records will be allowed. Ideally, each vendor would appear in the VMF only once. In practice, multiple records for the same vendor may be required if the system allows for multiple attributes within unique vendor records. Separate attributes for the same vendor may be necessary to show differences in remit-to addresses, discount terms, or transactional tax treatments. The district should work with vendors to consolidate multiple remittance addresses and save both the district and the vendor's time and money.

Manage one-time vendor accounts separately. Policy and procedures should be established to ensure that vendor master records for limited-use vendors are

identified. Establish minimum transaction counts (e.g., five annual transactions) and spending thresholds (e.g., \$5,000 annually). Vendors that do not meet these thresholds should be processed as one-time vendors.

Apply consistent naming conventions. Standards should be developed and implemented. All vendor records should use the same naming convention for spelling the full name, address, vendor number, ally review for inactive accounts, dand other identifying information. Data should be consistently input in the same data fields.

Review systems and procedures on a regular basis. Vendor master records should be evaluated regularly, and inactive and duplicate vendors should be purged. Annuuplicate and incomplete records, file format errors, one-time vendors, and accuracy issues.

Remove old/unused vendors from the system. Develop and implement procedures to identify the frequency and timing for removing inactive vendors from the VME.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL	ONE TIME
						(COSTS) OR SAVINGS	(COSTS) OR SAVINGS
CHAPTER 4: PURCHASING							
16. Update purchasing procedures to fully implement the electronic procurement process by approving purchase requisitions using electronic support, eliminating the distribution of hard-copy vendor catalogs and purchase orders, and making links to the cooperative vendor catalogs on the district website.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
17. Establish adequate internal controls for the vendor master file and eliminate duplicate vendor listings.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 5
ASSET AND RISK MANAGEMENT

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 5. ASSET AND RISK MANAGEMENT

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

Managing assets and risks is dependent on the organizational structure of the district. Larger districts typically have staff dedicated to asset and risk management, while smaller districts assign staff these responsibilities as a secondary assignment. 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 includes efficient tax collections to allow a district to meet its cash flow needs, earn the highest possible interest, and estimate state and federal funding. Capital asset management should identify a district's property (e.g., buildings, vehicles, equipment) and protect it from theft and obsolescence. Insurance programs cover employees' health, workers' compensation, and district liability.

Presidio Independent School District's (ISD) business manager is responsible for cash and investment management and the district's risk management program. The business manager leads the Business Office and supervises a staff of five consisting of an accounts payable clerk, a Public Education Information Management System (PEIMS) clerk with cash responsibilities, a payroll clerk, a warehouse clerk, and a warehouse receiver (clerk). The business manager

reports to the superintendent. **Figure 5–1** shows Presidio ISD's Business Office organization.

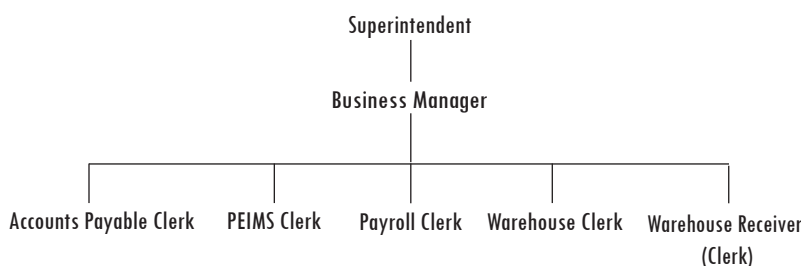
The district contracts separately with its former business manager and former superintendent for advice and guidance on matters mostly regarding school finance. These automatically renewing annual contracts have been in effect at approximately the same monthly rate since July 2008 for the former business manager and since July 2009 for the former superintendent. In school year 2012–13, the district paid an aggregate amount of \$85,745 for these services.

School districts must manage cash and investments daily to achieve their instructional goals and objectives. Effective cash and investment management involves establishing and maintaining banking relationships; monitoring cash balances; making timely cash deposits; accurately forecasting cash requirements to make funds available when needed; and maximizing returns on assets deposited in appropriate, approved, and safe investment vehicles.

The district maintains its operating funds at a local bank, while TexPool and Lonestar Investment Pools hold invested funds. Business Office staff obtain the balance on each Presidio ISD bank account daily from a bank representative. Deposits are hand-carried to the bank daily, and wire transfer requests are prepared and executed at the bank branch as needed.

As the investment officers for the district, the business manager and superintendent must, within 12 months after taking office and every two years thereafter, attend at least 10 hours of investment training relating to responsibilities

FIGURE 5–1
PRESIDIO ISD ORGANIZATION FOR ASSET AND RISK MANAGEMENT



SOURCE: Presidio ISD District Organization Chart and staff interviews, December 2013.

pursuant to the Public Funds Investment Act (the Act). In compliance with the Act, the business manager and superintendent completed 10 hours of training on March 20, 2013, and April 25, 2013, respectively.

FINDINGS

- ◆ Presidio ISD’s cash and investment accounts are not adequately set up in the accounting system to effectively manage cash positions.
- ◆ Presidio ISD’s bank account reconciliations lack sufficient detail to support each reconciliation component and are not performed in a timely manner.
- ◆ Presidio ISD has not maximized the use of cash management tools and techniques to efficiently monitor and manage cash and increase interest investment earnings.
- ◆ Presidio ISD has inefficient payroll processes, which increases the risk for errors.
- ◆ Presidio ISD does not have adequate policies and procedures to properly record, monitor, and dispose of fixed assets.
- ◆ Presidio ISD does not have adequate controls for salary advances to ensure funds are repaid and that the program complies with the Texas Constitution.

RECOMMENDATIONS

- ◆ **Recommendation 18: Establish separate bank account group codes in the Texas Enterprise Information System (TxEIS) finance module for each ISD bank and investment account, and link the related account codes.**
- ◆ **Recommendation 19: Establish written policy that requires all bank reconciliations to include adequate supporting detail and be prepared and approved by two separate individuals within 10 days after the end of each month for each bank account.**
- ◆ **Recommendation 20: Use the online banking services currently offered by the district’s depository and seek other cash management services to monitor and manage cash efficiently and maximize earnings on idle cash balances.**

- ◆ **Recommendation 21: Maximize the use of technology in the area of payroll, and ensure Business Office personnel are adequately trained.**
- ◆ **Recommendation 22: Update district policies and procedures to require an annual reconciliation of all asset listings, capture fixed asset elements needed for financial reporting, and remove the district’s name from disposed assets.**
- ◆ **Recommendation 23: Discontinue making salary advances, determine the current outstanding balance of each loan, and immediately collect all outstanding salary advances.**

DETAILED FINDINGS

GENERAL LEDGER CASH ACCOUNTS (REC.18)

Presidio ISD’s cash and investment accounts are not adequately set up in the accounting system to effectively manage cash positions. **Figure 5–2** shows Presidio ISD’s bank accounts and investment pool accounts as of August 31, 2013.

Presidio ISD has seven bank accounts and two investment accounts in which the district’s cash and short-term investments are maintained. In the district’s accounting system, Texas Enterprise Information System (TxEIS), account codes are structured in accordance with the Texas Education Agency’s (TEA) *Financial Accountability System Resource Guide (FASRG)*, Section 1.4. However, bank account group codes are not set up in TxEIS to link the account code activity to the specific bank and investment accounts shown in **Figure 5–2**. Currently, the system links all cash and investment activity to a generic “First Presidio Bank.” By associating all the account codes with one common bank account, the Business Office is unable to systemically produce a single cash balance per books related to a specific bank account without significant manual intervention. Thus, the Business Office must manually add various account code balances to determine the position of a specific bank account. The district is at risk of inadvertent human errors and potential data manipulation when manual processes are used to determine system cash balances.

Although the TxEIS finance module allows the district to assign account codes to specific bank accounts, the district has not established these account codes. TxEIS allows multiple fund codes to be linked to each bank account, and individual funds can have multiple investment and cash

**FIGURE 5–2
PRESIDIO ISD BANK ACCOUNTS AND INVESTMENT POOL ACCOUNTS AS OF AUGUST 31, 2013**

DEPOSITORY	ACCOUNT TYPE	PURPOSE	BALANCE 8/31/2013	STATUS 1/31/2013
First Presidio Bank	General Operating Checking	Clearing Account	\$895,642	Open
First Presidio Bank	Finance Clearing Checking	Disbursement Account	\$550,998	Open
First Presidio Bank	Bonded Debt Checking	Debt Service Transactions	\$25,748	Open
First Presidio Bank	Designated Purpose Checking	Federal Funds Clearing Account	\$117,903	Open
First Presidio Bank	Lunchroom Checking	Cafeteria Clearing Account	\$115,068	Open
First Presidio Bank	Student Activity Checking	Activity Funds	\$140,812	Open
First Presidio Bank	Payroll Checking	Payroll Clearing Account	\$50,275	Open
Lonestar Investment Pool	Investment Account	Investment Fund	\$6,883,303	Open
TexPool Investment Pool	Investment Account	Investment Fund	\$5,813,317	Open

SOURCE: Presidio ISD Business Office, Bank Account Listing and Investment Statement, August 31, 2013.

object/sub-object combinations. By linking funds and object combinations to the specific bank account, cash positions can be systematically generated in a consistent and controlled manner.

A key component of the cash management process is periodically determining cash on hand. This is most effectively done by reconciling accounting system activities with bank statements. In the way that Presidio ISD’s cash activity currently is tracked in TxEIS, the Business Office is not able to use the bank reconciliation TxEIS module to its fullest capacity. When the bank account group codes are set up for the specific bank and investment accounts shown in **Figure 5–2**, and the related account codes are systematically defined, the bank reconciliation module is designed to electronically reconcile the individual bank account statements with the general ledger account code activity.

When the module is used correctly, the reconciliation tool matches the activity recorded in the defined general ledger account codes with the bank statement activity and identifies differences between the two. The module enables users to quickly identify bank balance discrepancies from one month to the next, because it begins each reconciliation with the last month’s ending bank balance. In addition to displaying the last and current months’ bank balances, the system-generated report reflects aggregated deposits and disbursements as reported by the bank and the corresponding system balances. The report indicates the aggregate amount of any outstanding items and shows the net difference between the bank and TxEIS.

Use of the bank reconciliation module establishes efficiencies in determining cash positions and preparing bank reconciliations. It also strengthens controls by systematically obtaining, containing, and retaining the reconciliation components within TxEIS.

TEA’s *FASRG*, Section 1.5.4.2, recommends that school districts maintain separate bank accounts for each fund and have general ledger control of all bank accounts. Establishing separate bank account group codes in the TxEIS finance module to systematically determine bank account activity ensures the best practice procedural controls detailed in the *FASRG* are in place.

The district should establish separate bank account group codes in the TxEIS finance module for each ISD bank and investment account, and link the related account codes.

This recommendation could be implemented with existing resources.

BANK RECONCILIATIONS (REC. 19)

Presidio ISD’s bank account reconciliations lack sufficient detail to support each reconciliation component and are not performed in a timely manner.

The district maintains nine bank accounts, including seven operating accounts at the local bank and two investment accounts at TexPool and Lonestar. The district does not have a written policy requiring reconciliation of bank account activity to the general ledger. In practice, the seven accounts are reconciled manually in the third to fourth week after

month's end. The reconciliation is performed by the PEIMS clerk and the business manager. Although two individuals are involved in the reconciliation process, the work is not clearly delineated between preparer and approver. The information needed to reconcile the cash accounts, such as bank statements, general ledger balances, and cleared checks, are compiled by the PEIMS clerk. This information is given to the business manager to complete and approve the reconciliations. The business manager completes a reconciliation template by hand. The template is signed by the business manager, indicating that the reconciliation was "performed by" the business manager and the PEIMS clerk.

However, the documentation included in the reconciliation does not consistently contain details to support the amounts listed on the reconciliation template. The review team noted the following examples:

The General Operating Fund book balance per the August 30, 2013, reconciliation does not agree to the TxEIS-generated balance of \$851,376.04. The book balance support consists of two handwritten amounts that summed to \$847,798.92.

The Finance Clearing account book balance per the August 30, 2013, reconciliation of \$160,132.90 was supported by a system-generated balance of \$34.30 plus a handwritten amount of "\$160,167.27 acct. payable." No detailed support for the accounts payable balance was included.

The General Operating Fund book balance of \$364,827.59 per the September 30, 2013, reconciliation is supported with a handwritten amount that does not sum using the amounts provided.

The Designated Purpose account book balance per the October 31, 2013, reconciliation of \$113,862.31 was inadequately supported with two amounts summing to \$113,862.31 written on the system-generated working trial balance report.

Reconciling items are not consistently cleared on a timely basis. The review team noted these examples:

The October 31, 2013, Student Activity account reconciliation contains a reconciling item of \$500 dated August 24, 2011.

The General Operating Fund account reconciliations contained seven aged reconciling items dated 2009, 2010, and 2011 since September 28, 2012.

When reconciliations are not performed in a timely manner, the district cannot be certain that its cash is safeguarded or that its accounting records are accurate. Even relatively short periods during which bank accounts are unreconciled increases the risk that transactions might not be readily identified and recorded. Errors might be overlooked, and any potential refunds due to banking errors might be lost during short periods of unreconciled balances.

TEA's *Financial Accountability System Resource Guide*, Section 5.5.4.5, Monthly Bank Statements, states, "all bank accounts should be reconciled on a monthly basis by a person who is independent of safeguarding ... cash or investments." Performing timely bank reconciliations allows districts to compare their accounting records to the bank's records of transactions and balances to uncover any possible discrepancies. Bank reconciliations are a critical component of internal control, because they help ensure the accuracy of recorded cash balances and the identification and correction of bank errors.

The district should establish written policy that requires all bank reconciliations to include adequate supporting detail and be prepared and approved by two separate individuals within 10 days after the end of each month for each bank account. The preparer and approver roles of the PEIMS clerk and the business manager should be clearly defined.

This requirement allows ample time for the district to receive and reconcile the bank statement and identify any reconciling items. Reconciliations should be supported with system-generated account balances and detailed reconciling items. Reconciling items should be cleared within 60 days of identification. To monitor compliance with the policy, the business manager should establish a schedule listing each bank account; the date that the reconciliation was approved; and a list and date of aged reconciling items of more than 30 days. Reconciliations should indicate who prepared and approved the reconciliation as evidenced with individual signatures. The district should keep the schedule as evidence that bank accounts are reconciled on time.

This recommendation could be implemented with existing resources.

CASH MANAGEMENT TECHNIQUES (REC. 20)

Presidio ISD has not maximized the use of cash management tools and techniques to efficiently monitor and manage cash and increase interest investment earnings.

The district does not use online banking, even though its bank offers these services:

- access and print information on all accounts, including loans;
- options to review and print transactions;
- confirmation of deposits, withdrawals, and checks cleared;
- ability to transfer funds between accounts and make loan payments;
- features to view deposits and checks cleared; and
- e-mail alerts.

Instead of using online banking, each day a Business Office representative travels to the local bank and obtains the account balances for all seven district accounts. The account balances are conveyed to the business manager for review and analysis. Fund transfers between Presidio ISD bank accounts are performed by the Business Office by writing a check to the specific fund or executing transfers at the bank. Wire transfers are requested and authorized by the business manager at the bank.

The business manager maintains at least \$300,000 in the General Operating Fund checking account at First Presidio Bank at all times. The district manually calculates cash requirements based on the amount of payroll and vendor checks written, and transfers that amount to the respective bank account balance to pay the checks.

By not using the online banking services available to the district, the district is missing an opportunity to streamline cash monitoring processes. Assuming an employee spends one hour each day of a 40 hour work week physically conducting business at the bank, the district has essentially reduced the employee's productivity by approximately 10 percent by not using online banking.

The district is also missing the opportunity to use other cash management tools because Big Bend Banks N.A., the bank which owns the First Presidio Bank branch, does not offer a full suite of cash management services, such as controlled disbursement accounts, positive pay products, and sweep accounts.

Controlled disbursement allows cash managers to transfer enough cash into the account to address cash requirements for that day. Each morning, the bank provides the amount of checks clearing the account that day. This service eliminates

the guesswork regarding how much cash needs to remain in the accounts to pay out clearing checks. As a result, idle cash can remain in investment accounts longer, thereby increasing investment return.

Positive pay is a banking service that provides for pre-payment verification of check number and amount for checks issued by an organization. As checks are presented for payment, the bank verifies them against the pre-authorized list. This control prevents unauthorized checks from clearing the bank. While bank reconciliations also mitigate the risk of paying an unauthorized check, the payment would not be detected until after it was made. Positive pay prevents unauthorized payments from being made.

Some thieves have been able to circumvent positive pay by altering the payee on the positive pay list. A variation of positive pay, known as positive pay with payee verification, requires verification of the check number, amount, and payee. This security enhancement is becoming more critical as thieves are becoming more sophisticated.

Sweep accounts automatically sweep all district bank balances into overnight investments with higher interest rates. The service would ensure that the district is maximizing its investment earnings.

The district should use the online banking services currently offered by the district's depository and seek other cash management services to monitor and manage cash efficiently and maximize earnings on idle cash balances.

The business manager should identify all of the available cash management services that the district is not currently using and contact the bank to request that these services be added to its suite of services. The business manager should negotiate with the bank to ensure that the district receives these value-added services at no additional cost. If the district's current depository bank cannot provide the online banking services needed, then the district should identify another local or regional bank that can provide the services required to monitor and manage cash efficiently and maximize earnings on idle cash balances during its next issuance of the bank depository contract Request for Proposals.

This recommendation could be implemented with existing resources and may result in new interest earnings for the district.

Since the review, the district indicated that they have inquired about and are considering the use of the online banking services offered by their current depository bank.

MANUAL PAYROLL PROCESSING (REC. 21)

Presidio ISD has inefficient payroll processes, which increases the risk for errors.

The district has 282 full-time employees, of which 140 are classified as exempt and 142 are classified as non-exempt based on the Fair Labor Standards Act (FLSA) requirements. Presidio ISD employees by FLSA category are shown in **Figure 5–3**.

**FIGURE 5–3
PRESIDIO ISD EMPLOYEE BY DIVISION AND FLSA
CATEGORY FISCAL YEAR 2013-14**

DIVISION	EXEMPT EMPLOYEES	NON-EXEMPT EMPLOYEES	TOTAL
Presidio High School	40	19	59
Franco Middle School	28	8	36
Presidio Elementary School	62	28	90
Administration	10	28	38
Cafeteria	0	26	26
Maintenance	0	33	33
Total	140	142	282

SOURCE: Presidio ISD Business Office, Employee Verification Report as of December 12, 2013.

District payroll is paid biweekly. As required by law, non-exempt employees are paid a rate of 1.5 times their normal hourly rate for every hour worked more than 40 hours per work week. Although teachers are salaried and, therefore, exempt, many receive additional pay for tutorial time with students after school hours to prepare students for state exams. Non-exempt employees use a time logging system called Timeclock Plus to log the time worked; however, the district has not integrated the system with TxEIS. Weekly timesheets for employees who work more than 40 hours are manually completed and submitted to the employee’s supervisor or principal for approval, and then are sent to the Business Office for processing.

Payroll responsibilities are performed by the payroll clerk in the Business Office and reviewed by the business manager. The payroll clerk calculates the gross amount of overtime pay owed to the employee using an adding machine. The payroll clerk records the employee’s name, employee number, payroll date, gross amount earned, and associated fund code on a columnar accounting ledger. The columnar accounting ledger, along with the adding machine tape supporting the

calculations, is submitted to the business manager for approval.

Employees are granted nine days of leave per year for illness. Of these nine days, five are paid personal leave granted by the state in accordance with the Texas Education Code, Section 22.003. State personal leave accumulates without limit, is transferable to other Texas school districts, and may transfer to education service centers. Four additional (referred to as “local”) days are granted by the district. In addition, the district established a sick leave pool from voluntary donations of local leave and state personal leave by individual district employees. The donated leave may be used to assist an employee suffering personal illness or disability, including pregnancy-related disability; or to assist an employee absence due to the illness or disability of a member of the employee’s immediate family.

Before August 2013, sick days used were recorded by the payroll clerk in a columnar accounting ledger. When employees exceeded the accumulated paid personal leave time, the payroll clerk reduced pay accordingly. In August 2013, the district implemented an automated substitute placement and absence management system to communicate and record absences.

Processing payroll information manually is an inefficient use of resources. The process is time-consuming in all phases, including preparation, review, and recording transactions. The risk of errors increases when calculations are performed manually using information maintained in different systems. The risk is also present when the information calculated must be subsequently recorded into the system of record, TxEIS. For example, the review team noted during the site visit that the payroll clerk recorded an employee’s personal leave of absence in the accounting ledger but did not post this information to TxEIS. As a result, the employee’s paystub did not reflect the actual absences taken. The issue became known when the employee’s paycheck amount was reduced based on the number of absences recorded in the accounting ledger.

Since migrating to the automated substitute placement and absence system, the payroll clerk has not updated sick leave balances in TxEIS for any district employee due to lack of training.

Automated payroll processes can save employers time and money, while potentially improving accuracy and recordkeeping capabilities. Technology is available to interface the district’s time clock system with the TxEIS

Human Resources module. The interface enters the hours worked from the time clock system into the payroll system to calculate amounts due using information maintained in TxEIS.

The district should maximize the use of technology in the area of payroll, and ensure Business Office personnel are adequately trained.

To do this, the Business Office should:

- eliminate manual payroll processes, and automate the calculations and recording of overtime and personal leaves and absences;
- integrate the time-clock data with the TxEIS Human Resources module, and automate all payroll calculations; and
- provide training to Business Office staff to utilize the data captured in the absence management system, and to post absences to TxEIS Human Resources module.

The module to interface the time-clock system with the payroll system would require an upfront cost; however, the review team cannot provide a cost range to implement because that information is considered proprietary between the vendor and the district. The training could be conducted by the Technology director at no additional cost to the district.

FIXED ASSETS (REC. 22)

Presidio ISD does not have adequate policies and procedures to properly record, monitor, and dispose of fixed assets.

Fixed assets are not consistently tagged upon acquisition. The district uses three lists to track fixed assets; however, the lists are not reconciled on a periodic basis. Upon disposition, Presidio ISD does not consistently remove the district's name from the fixed assets.

Presidio ISD operates a central warehousing system whereby all deliveries of goods are made to the warehouse and distributed. Large equipment, such as industrial kitchen equipment, is delivered to the location at which it will be installed. The warehouse clerk and warehouse receiver (clerk) review purchase orders and deliveries to identify fixed assets. Technology equipment is segregated when received and delivered to the technology director.

Asset management functions are performed in two departments. The Technology Department is responsible for

tagging technology-related assets. The Business Office is responsible for tagging the other assets received. Presidio ISD tags assets worth more than \$500 and records the assets in inventory.

The district maintains three asset listings: Technology Inventory listing; Room Inventory listing; and Inventory Assets. The web-based Technology Inventory listing was developed by the Technology Department in December 2012 to record the district's technology-related assets. The Technology Department maintains an inventory of computers, laptops, MP3 players, printers, scanners, and related equipment. The inventory listing includes the tag number, acquisition date, the equipment type, model number, location, related fund number, and price. The purpose of the databases is to keep an inventory of the district's technology assets whether or not they are capital assets. When the district purchases a new technology asset, Technology Department staff obtain pertinent information about the asset from the packing slip, affix an identification label onto it, and record the asset into the inventory listing.

The Room Inventory listing is a Microsoft Excel spreadsheet that contains the tag number, asset description, location, and serial number of assets on each campus. The purpose of the listing is to capture detailed asset information by location at the campus level. As such, the warehouse receiver (clerk) is charged with maintaining the listing to reflect new asset acquisitions and physical inventory results. The warehouse receiver (clerk) also adjusts the listing to reflect the updates made on the Technology Inventory listing. Each spring, the warehouse clerk and warehouse receiver (clerk) use the Room Inventory listing to conduct a physical inventory of the assets on campus.

The Inventory Assets listing is maintained by the Business Office using the TxEIS Fixed Asset module. The purpose of the listing is to capture fixed asset balances in the district's accounting system from which financial reports are produced. The business manager is responsible for monitoring the additions and removals of fixed assets on the list. The fields on the list include item number, date acquired, condition (new or used), description, cost, vendor, and account code.

The district's fixed asset policy does not address maintaining three systems and does not require reconciliation of subledgers to the TxEIS listing. Similarly, the policy does not address the need to remove the district's name from disposed assets.

Although the district appears to have basic elements needed to capture and report fixed assets, such as a centralized receiving process, and defined responsibilities to tag and record the assets in the system, not all assets are tagged, and the three systems are not reconciled. The business manager reported that the Inventory Assets listing is not updated.

The review team selected a sample from the asset listings at different district locations to determine if assets were tagged and recorded in the listing. As shown in **Figure 5-4**, 12 of the 24 assets selected in the sample were not tagged.

The TxEIS Inventory Assets list also does not have any information needed to depreciate the assets, such as useful life, depreciation method, estimated salvage value, or asset classification type. Presidio ISD reports depreciation in its financial statements but relies on its audit firm to maintain the depreciation schedule. The TxEIS listing contains no references to asset location or source documents such as purchase orders or invoices. Although physical inventory counts are performed each year, the TxEIS Inventory Assets listing is not reconciled to the detailed Technology or Room Inventory listings. As a result, the Inventory Assets listing is not a useful record to support the fixed asset balances and depreciation listed in the financial statements.

The review team also noticed old Presidio ISD school buses in and around the community. The district discarded the buses, but the district’s name was still affixed to the vehicles. The district’s reputation is at risk when its disposed assets contain its name. In some circumstances, the district may be at risk financially when assets are not cleaned up at disposition.

TEA’S *FASRG*, Section 1.2.4.7, recommends that all movable capital assets be marked with a code to permit positive identification. The *FASRG* states that certain capital assets, such as furniture and equipment, should be inventoried on a periodic basis, and discrepancies between the capital asset/inventory list and what is on hand should be settled. It is also recommended that missing items be listed and written off in accordance with established policy.

The Governmental Accounting Standards Board (GASB) also requires that fixed asset information, such as beginning balances, acquisitions, dispositions, and annual depreciation expense, be disclosed.

**FIGURE 5-4
PRESIDIO ISD SAMPLE OF FIXED ASSETS**

ITEM	LOCATION	TAG NUMBER	DESCRIPTION
1.	Elementary School	No Tag	55-inch Monitor
2.	Elementary School	No Tag	Epson Projector
3.	Elementary School	14027	HP Printer
4.	Elementary School	No Tag	Blue Teachers Instruction Table
5.	Elementary School	No Tag	5 Computer Tables
6.	Elementary School	9372	Epson Projector
7.	Elementary School	7923	Dell Laptop
8.	Elementary School	7957	Dell Laptop
9.	Elementary School	7116	Dell Laptop
10.	Elementary School	No Tag	Xerox Workcenter 5765
11.	Elementary School	No Tag	Refrigerator (White)
12.	Elementary School	7160	Epson LCD Projector
13.	Elementary School	7082	Dell Laptop
14.	Middle School	9533	Salad Bar
15.	Middle School	9532	Salad Bar
16.	Middle School	No Tag	Refrigerator
17.	Middle School	8411	Flavor Hold C199
18.	Middle School	No Tag	Ice Machine
19.	Middle School	8121	Microwave
20.	Middle School	No Tag	Skillet Solaris
21.	Middle School	15691	Lenova Laptop
22.	High School	No Tag	Epson Workforce WF3540
23.	Board Room	No Tag	2 Monitors
24.	Board Room	No Tag	1 Large Screen Smart Board

SOURCE: Presidio ISD Business Office, asset lists and district locations, December 2013.

Maintaining accurate information regarding the district’s fixed assets is essential to ensure the district has adequate insurance coverage and the information necessary to file a claim if a loss occurs.

The district should update district policies and procedures to require an annual reconciliation of all asset listings, capture fixed asset elements needed for financial reporting, and remove the district’s name from disposed assets.

The district should develop a standard reconciliation template to ensure consistent methodology and accuracy. Fixed asset details such as useful life, depreciation methodology, and estimated salvage value can be maintained in TxEIS.

This recommendation could be implemented with existing resources.

SALARY ADVANCE CONTROLS (REC. 23)

Presidio ISD does not have adequate controls for salary advances to ensure funds are repaid and that the program complies with the Texas Constitution.

Presidio ISD issues salary advances without a written policy. Initially, staff reported that salary advances of \$500 were available to new employees upon request at the beginning of the school year. The loans were made to assist new-hires, especially new teachers, with moving expenses, such as housing and utility deposits or other start-up costs as they moved to the district or transitioned into their careers. Interest is not charged on the advanced amounts.

The program has evolved so that salary advances are now available any time to any employee, not just new hires, and the amount is not capped at \$500. Records indicate that during the last four fiscal years, only two advances were made to new-hire employees. As shown in **Figure 5–5**, Presidio ISD has made 30 payroll advances totaling \$63,475 from fiscal years 2009 to 2013.

Of the 30 payroll advances made during fiscal years 2009 to 2012, half were made to four employees, totaling \$48,775. **Figure 5–6** shows the multiple salary advances made during fiscal years 2009 to 2013 to those four employees.

Salary advance requests are submitted using a standard form or e-mail to the Business Office and are approved by the superintendent and business manager. Salary advance requests made by the superintendent are submitted to and approved by the business manager.

**FIGURE 5–5
PRESIDIO ISD SALARY ADVANCES MADE DURING
FISCAL YEARS 2009 TO 2013**

SALARY ADVANCE	DATE	AMOUNT OF SALARY ADVANCE
1.	9/15/2009	\$2,000
2.	4/16/2010	\$9,000
3.	9/1/2010	\$5,000
4.	9/1/2010	\$5,000
5.	9/24/2010	\$1,500
6.	10/1/2010	\$1,200
7.	1/28/2011	\$500
8.	3/4/2011	\$3,000
9.	4/21/2011	\$125
10.	7/19/2011	\$2,000
11.	7/27/2011	\$2,000
12.	9/2/2011	\$500
13.	9/2/2011	\$10,000
14.	9/5/2011	\$500
15.	9/5/2011	\$500
16.	9/16/2011	\$500
17.	3/20/2012	\$600
18.	6/28/2012	\$500
19.	8/21/2012	\$500
20.	9/11/2012	\$5,000
21.	10/30/2012	\$3,000
22.	11/26/2012	\$500
23.	1/9/2013	\$600
24.	1/18/2013	\$1,500
25.	3/28/2013	\$500
26.	6/21/2013	\$450
27.	8/19/2013	\$500
28.	8/27/2013	\$5,000
29.	8/27/2013	\$500
30.	8/27/2013	\$1,000
Total		\$63,475

SOURCE: Presidio ISD Business Office, check register fiscal years 2009-2013.

**FIGURE 5–6
PRESIDIO ISD MULTIPLE SALARY ADVANCES MADE TO
FOUR EMPLOYEES, FISCAL YEARS 2009 TO 2012.**

EMPLOYEE	NUMBER OF ADVANCES	TOTAL
1.	7	\$41,000
2.	4	\$3,325
3.	2	\$3,450
4.	2	\$1,000
Total	15	\$48,775

SOURCE: Presidio ISD Business Office, check registers fiscal years 2009 to 2012.

Repayment schedules vary by employee. Most salary advances are repaid evenly on a weekly or bi-weekly basis within two to three months. However, some salary advances are repaid in lump sum amounts, and some repayment schedules extend beyond three months. **Figure 5–7** shows the repayment schedules and duration of the outstanding loans.

Once a salary-deduction repayment schedule is arranged, the check is issued with electronic board signatures. Advances can be obtained the same day as requested. The review team's sample selection showed one instance where a salary advance request was e-mailed mid-afternoon to the business manager, and a check was issued the same day.

**FIGURE 5–7
PRESIDIO ISD REPAYMENT OPTIONS AND DURATION OF OUTSTANDING SALARY ADVANCES
FISCAL YEARS 2012 TO 2013**

SALARY ADVANCE	DATE	AMOUNT	REPAYMENT SCHEDULE	DATE REPAYED IN FULL	DAYS OUTSTANDING
1.	9/2/2011	\$500	Weekly	9/29/2011	27
2.	9/2/2011	\$10,000	Various	Indeterminable based on information provided	Could not determine
3.	9/5/2011	\$500	Lump sum	9/8/2011	3
4.	9/5/2011	\$500	Lump sum	9/8/2011	3
5.	9/16/2011	\$500	Not available	Not repaid	Outstanding
6.	3/20/2012	\$600	Bi-weekly	4/12/2012	23
7.	6/28/2012	\$500	Bi-weekly	9/13/2012	77
8.	8/21/2012	\$500	Bi-weekly	10/25/2012	65
9.	9/11/2012	\$5,000	Various	Indeterminable based on information provided	Could not determine
10.	10/30/2012	\$3,000	Bi-weekly	6/20/2013	233
11.	11/26/2012	\$500	Bi-weekly	4/11/2013	136
12.	1/9/2013	\$600	Bi-weekly	6/20/2013	162
13.	1/18/2013	\$1,500	Bi-weekly	6/20/2013	153
14.	3/28/2013	\$500	Bi-weekly	5/23/2013	56
15.	6/21/2013	\$450	Bi-weekly	8/1/2013	41
16.	8/19/2013	\$500	Information not provided	Information not provided	Not provided
17.	8/27/2013	\$5,000	Lump sum due 2/8/14	Information not provided	Not provided
18.	8/27/2013	\$500	Information not provided	Information not provided	Not Provided
19.	8/27/2013	\$1,000	Information not provided	Information not provided	Not Provided

SOURCE: Presidio ISD Business Office, Detail Year to Date Deduction Register from September 1, 2011 to August 31, 2013.

The Business Office records salary advances in TxEIS in an account labeled “Sundry and Other Receivables.” The Sundry and Other Receivables account includes check number, date, employee name, and amount. Salary advances are not always repaid by the end of the fiscal year. The remaining balances at the end of fiscal year 2011 and fiscal year 2012 were \$5,305 and \$7,000, respectively. At the end of each fiscal year, the aggregate outstanding balance of the Sundry and Other Receivables account is carried into the next period.

The agreed-upon salary deduction schedule is recorded in the “Miscellaneous Deduction — Advance” account. This account includes employee name, pay date, amount, and check number. The Business Office establishes the number of deductions in this account. Although the applicable information is available in the system, the Business Office does not maintain a schedule of outstanding balances by employee.

Making salary advances available to all employees without a written policy puts the district at risk. In practice, the district does not cap the amount an employee may be advanced against her or his salary. Salary advances are recorded in the check register that is posted on the district website. If all 282 district employees requested a salary advance of \$500, the exposure to the district would be \$141,000. If all 282 district employees requested a salary advance of \$10,000, the highest advance granted during the four fiscal years shown in **Figure 5-5**, the exposure to the district would be \$2,820,000. The probability of this occurring is extremely low. However, without written policy, the district is not in a strong position to deny \$10,000 salary advances to other employees.

Current practice allows the business manager to fund salary advances the same day they are requested. The board is provided the check register that lists salary advances among other expenditures for approval at the next monthly board meeting. However, this practice does not give the board an opportunity to review and approve salary advance requests before funds are distributed. As a result, funds might be distributed that the board might otherwise disapprove.

Pursuant to the Texas Constitution, Article III, Section 52(a), the Legislature may not authorize a political corporation, including a school district, to grant public money to an individual unless the money is used to carry out a public purpose. The Texas Supreme Court rendered a decision in *Tompkins v. Williams*, 62 S.W.2d 70, 71 (Tex. Comm’n App. 1933, judgment adopted) and in *accord State v. City of Austin*, 331 S.W.2d 737, 742 (Tex. 1960) that “when

a governmental entity is not liable on a claim, the payment of that claim constitutes “a pure gift or donation” and violates the constitution.” As detailed in the Attorney General of Texas Opinion Number GA-0076 on May 27, 2003, funds expended will not constitute a gift of public funds prohibited by Article III, Section 52, if the district applies these qualifications, issued by the Texas Supreme Court, to determine if it accomplishes a public purpose: (1) ascertain if the expenditure’s predominant purpose is to accomplish a public purpose, not to benefit private parties; (2) retain sufficient control of the expenditure to ensure that the public purpose is accomplished; and (3) ensures that the district receives a return benefit.

Presidio ISD’s current practice of advancing public money to its employees without prior board approval and written policies to ascertain if the advances accomplish a public purpose may not be consistent with the opinion issued by the Attorney General.

By not tracking outstanding balances per employee, information regarding what is owed to the district may become distorted. For example, when multiple salary advances are made to one employee, the repayment schedule does not specify to which advance the deduction is being applied.

Clearly written policies and procedures provide structure to an organization and establish a foundation from which managers can make daily decisions. Policies and procedures also serve as an internal control method so that managers cannot take free license to make unauthorized decisions, or, conversely, rationalize the execution of daily operations.

Although the *FASRG* does not specifically address salary advances, Section 1.5.4.4 recommends the procedure of reconciling the aggregate collections on accounts receivable against postings to individual receivable accounts. The reconciliation is typically performed at month’s end or year-end to identify and rectify discrepancies between the subledger and the general ledger.

The district should discontinue making salary advances, determine the current outstanding balance of each loan, and immediately collect all outstanding salary advances.

This recommendation could be implemented with existing resources.

Since the onsite review, the district reports that the practice of granting salary advances has been discontinued completely and is no longer an option for any employee. All but two

accounts have been repaid, and both must be paid in full by the end of the current fiscal year. A management directive was also issued by the superintendent to the district’s business manager instructing that the statement “salary advances are

not allowed” be added to the Business Office Procedures Manual and updated in the manual on the website.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 5: ASSET AND RISK MANAGEMENT							
18. Establish separate bank account group codes in the Texas Enterprise Information System (TxEIS) finance module for each ISD bank and investment account, and link the related account codes.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
19. Establish written policy that requires all bank reconciliations to include adequate supporting detail and be prepared and approved by two separate individuals within 10 days after the end of each month for each bank account.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
20. Use the online banking services currently offered by the district’s depository and seek other cash management services to monitor and manage cash efficiently and maximize earnings on idle cash balances.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
21. Maximize the use of technology in the area of payroll, and ensure Business Office personnel are adequately trained.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
22. Update district policies and procedures to require an annual reconciliation of all asset listings, capture fixed asset elements needed for financial reporting, and remove the district’s name from disposed assets.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
23. Discontinue making salary advances, determine the current outstanding balance of each loan, and immediately collect all outstanding salary advances.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 6
HUMAN RESOURCES

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 6. HUMAN RESOURCES

An independent school district's human resources function is responsible for the management of staff. This function is critical because compensation and benefits account for approximately 80 percent of the average Texas school district's total budget. 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 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.

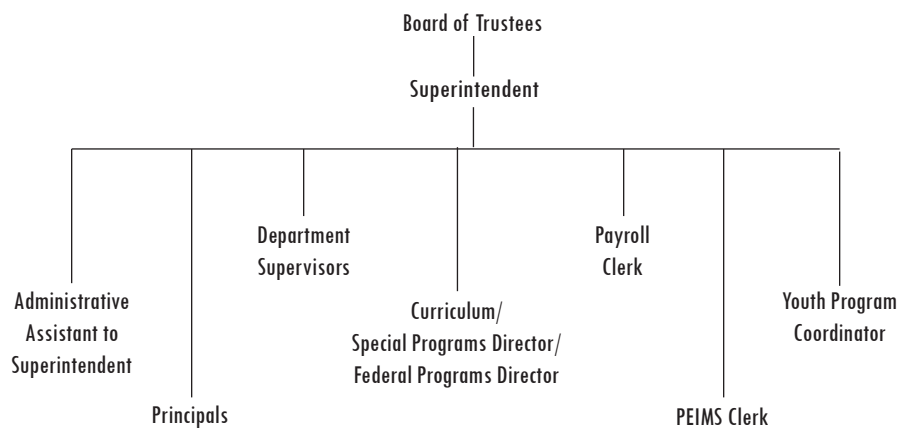
In Presidio Independent School District (ISD), the superintendent assigns human resources (HR) responsibilities to various staff members, and the superintendent's administrative assistant and the district's youth program

coordinator (YPC) are tasked with most HR duties. Principals and department supervisors perform the duties of screening applicants for new positions, setting up interview committees, and interviewing candidates. As part of the hiring process, principals and supervisors recommend two candidates from the interview pool for the superintendent's consideration and eventual hire.

The curriculum/special programs director/federal programs director assists with conducting new employee orientation and determines highly qualified status, as defined by the federal No Child Left Behind Act, for new teacher and educational aide hires. The payroll clerk in the Business Office collects all new hire paperwork, and the Public Education Information Management System (PEIMS) clerk in the Business Office manages benefits, including workers' compensation. **Figure 6–1** shows the district's organization for the HR function.

The district employs 283.9 full-time equivalent (FTE) positions, which includes 130.8 FTE teachers on the district's three campuses. In 2010–11, payroll accounted for 51.3 percent of funds expended in the district. **Figure 6–2** shows a comparison of payroll costs in Presidio ISD to costs for a set of peer districts whose size, demographics, and geographic location closely align to Presidio ISD. Identified peer districts are Monte Alto, Muleshoe, Santa Rosa and Tornillo ISDs.

FIGURE 6–1
PRESIDIO ISD ORGANIZATION FOR HUMAN RESOURCES DUTIES
SCHOOL YEAR 2012–13



SOURCE: Presidio ISD staff interviews, December 2013.

**FIGURE 6–2
PRESIDIO ISD’S PAYROLL EXPENDITURES AS PERCENTAGE OF ALL FUNDS COMPARED TO PEER SCHOOL DISTRICTS
SCHOOL YEAR 2010–11**

	MONTE ALTO ISD	MULESHOE ISD	PRESIDIO ISD	SANTA ROSA ISD	TORNILLO ISD
Total Expenditures	\$12,817,848	\$21,390,892	\$26,188,492	\$15,303,628	\$13,115,444
Payroll Expenditures	\$6,450,241	\$10,077,578	\$13,439,700	\$9,072,897	\$9,103,320
Payroll Percentage	50.3%	47.1%	51.3%	59.3%	69.4%
Total Staff	123.3	229.0	283.9	202.0	176.9

SOURCE: Texas Education Agency, Academic Excellence Indicator System Report for Expenditures in 2011–12.

Figure 6–2 shows that Presidio ISD has more staff than the peer districts, but payroll, as a percentage of total expenditures, is lower than Tornillo ISD (69.4 percent) and Santa Rosa (59.3 percent).

Figure 6–3 shows average salaries for Presidio ISD compared to its peer districts. Presidio ISD average salaries are the second lowest for principals and the second highest for the superintendent. Elementary and secondary teachers’ average salaries fall in the middle of the peer districts, and the educational aides’ average salaries are the second highest.

**FIGURE 6–3
PRESIDIO ISD AVERAGE BASE SALARIES FOR ADMINISTRATIVE, INSTRUCTIONAL, AND SUPPORT PERSONNEL
COMPARED TO PEER SCHOOL DISTRICTS
SCHOOL YEAR 2012–13**

EMPLOYEE TYPE	MONTE ALTO ISD	MULESHOE ISD	PRESIDIO ISD	SANTA ROSA ISD	TORNILLO ISD
All Personnel	\$34,211	\$35,151	\$35,350	\$34,513	\$37,349
Teachers	\$44,078	\$41,596	\$44,233	\$45,147	\$46,799
Pre-K	\$39,838	\$35,514	\$39,648	\$43,832	\$58,100
Kindergarten	\$42,950	\$42,533	\$38,044	\$42,180	\$46,995
Elementary	\$44,335	\$41,027	\$45,089	\$45,495	\$46,346
Secondary	\$44,107	\$42,256	\$44,507	\$45,293	\$46,719
Support Staff	\$52,039	\$45,593	\$58,011	\$49,302	\$58,373
Librarians	N/A	\$41,714	N/A	\$45,321	N/A
Other Non-Instructional	N/A	\$67,000	\$63,027	\$45,948	N/A
Administrators	\$73,422	\$80,387	\$73,160	\$78,316	\$92,758
Principals	\$78,371	\$76,950	\$76,367	\$69,473	\$85,500
Superintendent	\$95,000	\$183,900	\$124,681	\$109,400	\$114,532
Total Professional	\$47,528	\$45,296	\$47,596	\$47,471	\$49,332
Educational Aides	\$16,294	\$13,657	\$20,577	\$15,852	\$22,565
Auxiliary Staff	\$19,342	\$23,456	\$22,512	\$20,112	\$23,371

SOURCE: Texas Education Agency, Public Education Information Management System Standard Reports, school year 2012–13.

FINDINGS

- ◆ Presidio ISD human resources functions are not efficiently, effectively, and consistently managed, and functions lack written procedures to ensure compliance with legal requirements and district policies.
- ◆ Presidio ISD lacks established procedures to manage personnel records, and records are not centrally located, organized, or managed in compliance with legal requirements.
- ◆ Presidio ISD does not consistently develop job descriptions and conduct employee evaluations so that workplace responsibilities and expectations are communicated.
- ◆ Presidio ISD does not follow established compensation procedures for the clerical/paraprofessional and auxiliary employee groups.
- ◆ Presidio ISD rents district-owned housing units to professional employees without written policy or procedures.

RECOMMENDATIONS

- ◆ **Recommendation 24: Assign management of human resources responsibilities to a central office administrator who should attend human resources training, develop written procedures, and supervise human resources functions.**
- ◆ **Recommendation 25: Assign personnel records management responsibilities to the superintendent's administrative assistant so that all personnel records are centrally located and consistently organized, and to ensure that records adhere to state and federal rules and laws.**
- ◆ **Recommendation 26: Assign responsibility to establish procedures and schedules so that job descriptions and performance evaluations are annually reviewed, updated, and provided to district employees.**
- ◆ **Recommendation 27: Use the compensation program's procedures to ensure best practices are followed.**
- ◆ **Recommendation 28: Assign an administrator the responsibility of writing local policy and procedures to guide the process of determining**

eligibility/allocation criteria and pricing of district rental units.

DETAILED FINDINGS

HUMAN RESOURCES MANAGEMENT (REC. 24)

Presidio ISD human resources functions are not efficiently, effectively, and consistently managed, and functions lack written procedures to ensure compliance with legal requirements and district policies.

The superintendent of Presidio ISD informally oversees the primary human resources functions of: approving job postings; hiring staff (with the exception of administrators, that is, positions above the teacher level, who are hired by the Board of Trustees); reviewing criminal history reports; setting salaries; overseeing the management of substitute teachers; approving overtime; and monitoring health benefits and workers' compensation programs. Assisting the superintendent with human resources responsibilities are the administrative assistant and the youth program coordinator (YPC).

To initiate new hires, the superintendent's administrative assistant and the YPC work together to post vacancies on the district's website or in newspapers in Dallas and El Paso for hard-to-fill teaching positions. Once the postings are closed, or when principals or supervisors are ready to start the interview process, the superintendent's administrative assistant sends the paper applications to the appropriate campus principal or department supervisor for applicant screening to determine which candidates will be interviewed. Since 2007, the superintendent has required principals and department supervisors to select an interview committee to participate in the hiring process, because previously the district often hired staff without any type of formal procedure. The formation of interview committees as part of the hiring process helps ensure that the district provides applicants an equal opportunity to obtain employment. The interview committee usually consists of three to five teachers who serve on the Campus Quality Team (CQT). The members of the interview committee along with the principal or supervisor have the authority to recommend candidates to the superintendent for his review. Campus principals reported that occasionally other personnel who are not members of the CQT are asked to serve on the interview committee.

After interview committees conduct interviews with the screened candidates, the committee selects two applicants to recommend to the superintendent for hire. The

superintendent interviews these two candidates and has the authority to hire the best applicant for the position. The superintendent's administrative assistant performs the criminal history background check on recommended candidates, and, if clear, the hire is finalized. The superintendent's administrative assistant then secures the new hire's service records and establishes and maintains the employee's personnel file.

Interviews with administrative office staff members, however, indicate that the interview by committee process does not always occur for positions at the central office. Sometimes, supervisors will recommend district applicants for hire based on their known work ethics, reputations, and job qualifications.

With the supervision of the business manager, the payroll clerk collects new hire paperwork, including federal Employment Eligibility Verification Form I-9, when the district hires new employees. Using the district's Texas Enterprise Information System (TxEIS) Human Resources Data Management System, the payroll clerk enters and updates all employee demographic information in the database.

For other HR functions, the payroll clerk administers the district's leave and substitute management program. The business office clerk, who manages the district's data collection for PEIMS submission, administers the workers' compensation and health benefits programs with the supervision of the business manager.

According to interviews, the YPC provides guidance to the superintendent concerning employment issues, in addition to his regular duties of working with the district's youth and administering the Workforce Investment Act. The YPC occasionally consults with immigration counsel when the district hires teachers from foreign countries. The YPC also serves as the grant writer for the district.

With the exception of the YPC, the staff directly involved in human resources activities have had little or no training in hiring procedures or other human resources functions. For example, while the PEIMS clerk and business manager receive regular annual training for administration of health benefits for the district, the payroll clerk has not received training in required new hire documentation and storage procedures. All paperwork collected at the time of hire is currently filed in a binder by year and employee name, along with required payroll documents. A review of the binder

indicated that document collection is not uniform, and some required documents are missing.

The YPC has a background in paralegal work and experience as a civil rights investigator and has attended trainings in employment law, Equal Employment Opportunity regulations, and Title VII and Title IX requirements that his previous employment provided to him. Training in Title VII of the Civil Rights Law of 1964 and Title IX of the Education Amendments of 1972 are vital to human resources professionals, because this training provides guidance on how to avoid employment discrimination based on race, color, national origin, sex, disability, or age.

Many of the HR responsibilities that the district assigns to various staff are HR actions governed by federal and/or state laws. Without diligent oversight, training, and written procedures to guide consistent practice, the district runs the risk of facing penalties for non-compliance. For example, the district is not using the correct revised I-9 for all new hires and re-verification needs, as required by the United States Citizenship and Immigration Services (USCIS). The I-9 form the district currently uses was revised June 5, 2007, and is no longer valid.

On May 7, 2013, the USCIS informed U.S. employers that, as of that date, employers are required to use updated I-9 forms. The valid form is labeled "Revision 03/08/13N" in the lower left-hand corner. Through Internet bulletins, the USCIS regularly updates employers on legal matters that require state and federal agency compliance. As this example indicates, when districts do not assign an administrator or other person to oversee HR operations, changes in regulations such as those disseminated through the USCIS bulletin, go unnoticed. Several HR associations, such as the Society for Human Resources Management (SHRM), the Texas Association of School Business Officials (TASBO), the Texas Association of School Personnel Administrators (TASPA), and the Texas Association of School Boards (TASB), also provide Internet notices to members regarding compliance changes and issues that could potentially result in fines and other penalties. Presidio ISD, as a member of TASBO and TASB, should be receiving these notices on a regular basis.

Another example of possible inconsistencies in the district's HR practices relates to nondiscrimination language in hiring documentation. A review of the district's application packet and other documents indicates that the district is not using the required federal Office for Civil Rights (OCR) nondiscrimination statement. The OCR mandates that

districts inform students, parents, employees, and other groups that the district “does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs and activities and provides equal access to the Boy Scouts and other designated youth groups.” The requirement to use this exact notice is found in the U.S. Code of Federal Regulations (CFR), Title 34, Sections 100.6(d), 106.9, 104.8, 110.25, and 108.9, respectively, and is required of all public schools that receive federal funds. Most of the district’s

new-hire paperwork is not consistent with this OCR requirement.

The lack of supervision of the HR function results in inconsistent implementation of HR procedures and best practices. **Figure 6–4** shows selected Presidio HR activities compared to industry standards.

By not training pertinent district staff members on HR compliance requirements and best practices, the district may not meet basic HR standards. Establishing HR operations

**FIGURE 6–4
PRESIDIO ISD HUMAN RESOURCES ACTIVITIES COMPARED TO INDUSTRY STANDARDS
SCHOOL YEAR 2013–14**

TASK	INDUSTRY STANDARD	PRESIDIO ISD PRACTICE
Staffing	Establish staffing procedures to assist in allocating positions to each campus/department	Follows TASB’s staffing procedures provided in 2012 staffing review, with the exception of administrative personnel who were not included in the 2012 review
Job Posting	Post jobs on district and professional websites	Posts jobs on district website and in area newspapers and urban newspapers throughout Texas
Hiring Process	Follow hiring timeline from the time of posting to final selection of applicant who will be hired	Lacks written procedures that establish timelines
	Articulate selection procedure and criteria for selecting interview committee members	Lacks written procedures that articulate selection process and criteria to serve on interview committee
	Define procedure for screening applicants for interview	Lacks written procedures for screening applicants
	Provide guidance on proper interview protocols	Lacks written guidance on proper interview protocols
Compliance With OCR Requirements	Articulate the required number of reference checks and procedure for checking references	Lacks required notice of nondiscrimination as required of schools receiving federal funds
	Comply with OCR requirements that district documents have nondiscriminatory language in document footer	Lacks required notice of nondiscrimination as required of schools receiving federal funds
Training of Staff in HR Best Practices	Monitor training offerings through district HR providers so staff is current on best practice	Lacks monitoring of training offerings and scheduling of training for district staff
Employee Records	Collect all federal, state, and locally required documents upon hire	Lacks consistency in collecting new hire paperwork; district uses expired I-9 form
Personnel Files	Establish and maintain personnel files that are organized and contain required paperwork	Lacks required federal and state required forms in personnel files
Job Description Management	Review and update job descriptions to ensure qualifications and job responsibilities are current	Lacks consistent practice so that job descriptions are consistently updated and provided to all employees
Employee Evaluations	Evaluate all personnel according to district policy	Lacks consistent process so that all personnel are evaluated annually
	Verify that all evaluations have been collected and filed	Lacks process to ensure all evaluations are completed and filed in personnel file
Employee Benefits	Administer health benefits according to industry standards	District clerk lacks training in following all procedures when administering health benefits
New Employee Orientation	Provide new employee orientation to new hires according to an established training schedule	Lacks staff development calendar for new hire orientation and other needed HR trainings

SOURCE: Texas Association of School Personnel; Presidio ISD staff interviews, December 2013.

with effective oversight and management and written policies and procedures would help ensure cohesive and reliable HR procedures.

San Elizario ISD, a small district outside El Paso, has established a hiring process that all departments and campuses use and apply consistently across the district. The district has established written procedures for its hiring process, for example, so that principals and district supervisors understand their roles and have clear procedures to implement hiring practice that is compliant with all applicable rules and laws. Another district that provides best practice examples is Irving ISD, which uses an online application process. Electronic application systems can interface with district HR data systems, such as the HR management system that Presidio ISD uses, so that new-hire information is automatically transferred to the employee database at the point of hire.

New administrators who are assigned responsibility for HR operations can take advantage of a two-day training session for beginning HR school administrators that is offered annually from TASB and TASP. This training, called the Texas School HR Administrators Academy, is held at the start of the school year in Austin. The training provides information on resources available to HR administrators and presents an overview of HR responsibilities, legal issues, recruiting and hiring best practice, personnel records management, compensation and benefits, managing certification, and federal No Child Left Behind requirements. HR administrators can systematically pursue other HR training opportunities to gain knowledge of the full range of HR legal requirements and best practice procedures. The cost of attending the TASB/TASPA training is \$450 per person.

The TASP Law Conference for School Administrators is held twice a year for a cost of \$175. This conference covers essential HR topics that present legal challenges to school districts. Immediately following the legal conference is the HR Conference, which presents HR best practice ideas from across the state. The fee for attending the HR Conference is an additional \$175.

The district should assign management of human resources responsibilities to a central office administrator who should attend human resources training, develop written procedures, and supervise human resources functions.

In considering this recommendation, the district may want to assign this duty to the current YPC. This employee already has HR training and possesses a basic understanding of HR

employment law. During this time of implementation and reorganization, the district may also consider reassigning the YPC's youth program responsibilities and other duties to another staff member. The duties should also include the hiring of administrators that is currently overseen by the Board of Trustees.

As a member of TASBO and TASB, the district already has access to a variety of HR training opportunities, most at no cost. When webinar training is not available, most professional development is offered in Austin or San Antonio, about a seven-hour drive from Presidio ISD.

As the assigned HR administrator begins the training process, this person should begin documenting HR procedures and reviewing and adapting best practice resources and templates. By writing these procedures as district regulations tied to district local policy, the district can post them electronically so that designated personnel have access. TASB is a resource that the district can utilize for sample regulations at no cost.

The HR administrator, with guidance from the superintendent, should also begin identifying how to best structure HR operations, develop a training calendar for all staff involved in HR and related business procedures, and establish an HR budget to help fund these activities. Using the trainer of trainers model, the HR administrator can defer some of the cost of training by personally training district staff:

- designate a district staff member whose primary duty is to oversee HR operations;
- authorize a team of district staff members who will share HR responsibilities;
- establish job descriptions for these staff members to capture their HR responsibilities;
- develop performance evaluations to determine how well responsibilities are executed;
- begin training the team in HR procedures;
- begin writing procedures based on HR training and resources available through HR associations. Consider tasking the team with sharing this duty; and
- publish the written HR procedures electronically so that designated staff members can easily access the documents as needed.

It is essential that the district immediately use the valid I-9 form. The district should also consider reauthorizing past

hires using the correct form (see www.uscis.gov). Also, the district should ensure the correct nondiscrimination statement is imprinted on all district paperwork. Finally, the district should immediately collect the required new-hire paperwork for placement in each employee's personnel file. TASB and other Texas HR associations can provide the district with a current list of forms that must be collected for placement in the personnel file.

The fiscal impact of this recommendation assumes that a staff member would attend the TASB/TASPA Texas School Administrators Academy at a one-time cost of \$450, plus an estimated \$560 for travel-related costs (fuel, lodging and meals), for a total one-time cost of \$1,010. The fiscal impact also assumes that a staff member would annually attend the TASPA Law Conference for School Administrators at a cost of \$175, as well as the additional HR conference at a cost of \$175. The travel-related costs for attending these conferences are estimated at \$680 (fuel, lodging and meals), for a total annual fiscal impact of \$1,030.

Since the time of the review, the district has decided that the YPC will serve as the Central Office Human Resources Coordinator, effective August 2014. He will report to the curriculum/special programs director/federal programs director. The district also stated that they will continue to handle all hiring through the committee approach (CQTs), with hirings at the administrator, teacher, and aide levels to be conducted by a committee that includes teachers, peers, parents, students, and administrators.

PERSONNEL RECORDS MANAGEMENT (REC. 25)

Presidio ISD lacks established procedures to manage personnel records, and records are not centrally located, organized, or managed in compliance with legal requirements.

The superintendent's administrative assistant has the responsibility of establishing and maintaining Presidio ISD personnel files, including performance appraisal records, signed employee contracts, and service records. The administrative assistant keeps personnel files in locked cabinets in the superintendent's front office.

The payroll clerk in the Business Office independently collects new-hire documents that new employees fill out and return to the payroll clerk for distribution or filing. Besides payroll and insurance forms, the payroll clerk collects these documents:

- I-9 form;
- emergency contact information;

- United States Department of Education ethnicity and race information form;
- federal Form SSA-1945 or notice that Presidio ISD employment is not covered by Social Security;
- authorization for release of personal information; and
- authorization for release of employment information.

In a random sample of personnel files located in both the superintendent's and business offices, the review team found that federal- and state-required documents were not consistently included in either the personnel file or the payroll clerk's binders. The records in both locations were not organized in any particular order, which made it difficult for staff to find records. Additionally, the district does not have standard operating procedures for the collection of documents or checklists that define which records belong in the personnel file as defined by federal and state statute. In addition, the district has not established a method or procedure to route records from the payroll clerk to all staff that need to review the records.

The required state and federal forms that were missing in both personnel files and payroll binders included:

- state certification documents and licenses;
- documentation that verifies that the teacher meets all highly qualified criteria;
- Social Security non-coverage notice;
- official transcripts;
- assignment records (not found in any of the sample files); and
- absence from duty forms (not found in any of the sample files).

Other missing documents included:

- job performance evaluations;
- recommendations for hire or personnel action forms; and
- fingerprint receipts.

Further, the Business Office uses an inefficient method to organize and store personnel records. Instead of filing records in file folders by employee name, Business Office personnel arrange these records in a binder sorted by year of hire and employee name. Using the binder method to file documents is ineffective. When Business Office personnel searched for

hire documents from a random list of employees, the clerk had to look up the hire date of each listed employee and then locate the correct binder to find the hire documents by the employee's last name. Locating the records proved to be laborious, as the clerk searched from binder to binder to find documents.

Due to the lack of training and standard operating procedures for establishing and maintaining personnel files, district personnel inconsistently collect and maintain documents. This inconsistency may result in a lack of compliance with some federal and state mandates. The methodology Presidio ISD uses to file some of these documents also presents a problem, because important documents are kept in two separate locations using two different organizational methods.

Industry standards suggest that organizations secure and keep the majority of personnel records in a central location maintained by HR personnel. This practice allows the district to appropriately respond and meet dictated timelines when responding to open records requests or subpoenas, thus avoiding possible penalties. Confidential records, such as criminal history information, medical records, and drug testing information, may be kept in a separate location. Also, keeping I-9 information in a separate location is prudent, because these records are subject to government audit.

South San Antonio ISD has developed an effective method to maintain personnel records using color-coded personnel file checklists for different employee groups. For example, the district uses one colored checklist for professionals requiring certification, a different color for the non-contract employees who do not require certification, and another colored checklist for substitute teachers who may be highly qualified. This system ensures that personnel records are complete and in accordance with federal, state, and local requirements. Using the personnel file checklists, the HR staff consistently order and file personnel records.

The district should assign personnel records management responsibilities to the superintendent's administrative assistant so that all personnel records are centrally located and consistently organized, and to ensure that records adhere to state and federal rules and laws.

The administrative assistant could act as the district's point person to collect all hire documentation and maintain personnel files. By using file checklists that delineate state and federal record requirements, which are available from TASB, the administrative assistant could ensure that all

required documents are collected. The payroll clerk should only collect payroll records such as withholding forms, health insurance forms, leave administration information, and the Social Security coverage notice. In considering this recommendation, the administrator charged with HR duties should establish standard operating procedures to guide personnel records management. Written procedures should identify access provisions and which parts of a file are confidential and exempt from release in response to open records requests. Responsibility for overseeing personnel records management should then be incorporated into the job description for the superintendent's administrative assistant. The HR administrator should provide records management training for the administrative assistant and a second person on staff who can serve as the personnel records manager's backup. With the administrator's supervision, the administrative assistant should be required to develop a plan to consistently organize district personnel records for each employee.

For example, each file could be divided into four sections. Section I could contain documents such as contracts, certification/licensure information, highly qualified information, service records, and fingerprint receipts. Section II could contain hire information such as application information, references, resumes, tax forms, recommendation letters, and all other required hire documents. Section III could contain miscellaneous information that the district also collects, such as employee acknowledgement forms. Section IV could contain confidential information, such as job performance evaluations and transcripts. This recommendation could be implemented with existing district resources.

Since the time of the onsite review, the district has decided to continue to have the superintendent's administrative assistant serve as the person responsible for personnel records management. However, the district states that she will not necessarily do all of the record keeping, but will periodically check the files for accuracy.

JOB DESCRIPTIONS AND EMPLOYEE EVALUATIONS (REC. 26)

Presidio ISD does not consistently develop job descriptions and conduct employee evaluations so that workplace responsibilities and expectations are communicated.

Interviews with administrative office staff indicate that the district does not consistently develop and issue job descriptions to non-teacher groups, such as administrators or

staff who work in the district's administrative office. Providing current job descriptions to employees is a district requirement, as outlined in Presidio ISD's local policy.

Job descriptions are a vital organizational management tool that is used to:

- clarify a position's required job qualifications;
- identify employee supervisors and reporting structures;
- list major job responsibilities; and
- detail the expected working conditions.

Further, district data indicate that while Presidio ISD provides job descriptions to most of its employees at the campus level, the district is not consistent in providing job descriptions to district leadership or their staff.

The Texas Education Code, Section 21.203(a), requires a written evaluation at least annually of each superintendent, principal, supervisor, counselor, or other full-time, certified professional employee, and nurse. Additionally, local policy specifically requires at least one annual employee evaluation conference to "discuss the written evaluation" as part of the district's job performance evaluation process. However, data indicate that, with the exception of teaching staff, the district does not consistently evaluate employees, including administrators, on an annual basis. During staff interviews, administrative office staff said sometimes their performance evaluations were verbal conversations pointing out areas in need of improvement. TEC, Section 21.35 (c), (d), specifically notes that a district may not use funds to pay an administrator who has not been appraised in the last 15 months.

School districts limit their ability to manage district operations in a cohesive, coordinated manner when job descriptions are not developed to explain workplace expectations and responsibilities. Without a formal, defined job description that details job responsibilities, supervisors may inadvertently assign employees job duties that are outside the scope of the employee's responsibilities, qualifications, and compensation, possibly leading to confusion, ineffective performance, and morale issues.

Organizations use annual job performance evaluations to measure how well employees are performing their job responsibilities and evaluate other workplace behaviors the district considers important. When organizations evaluate employees through informal verbal conversations, there is no

written documentation to support compensation considerations, promotion or demotion actions, or termination decisions. If an employee subsequently files a disparate treatment claim with the Equal Employment Opportunity Commission Office, the district may find it difficult to defend itself without written evidence of job performance history.

Killeen ISD has developed a system by which job descriptions are updated periodically. This school district sends copies of job descriptions to employees and asks them to revise them so that the job description accurately captures the responsibilities of their position. Socorro ISD is another school district that updates its job descriptions each time a position is posted. When a supervisor requests a posting for a vacant position, the district requires the supervisor to first update the job description. This system keeps district job descriptions up to date.

San Antonio ISD has a well-defined appraisal system to evaluate employee job performance and identify areas of strength and concern for all staff at the district. An appraisal system allows this district to account for all completed annual written appraisals. Contract renewals are not issued until each employee's appraisal is verified and filed. San Antonio ISD also tasked a human resources staff member with the duties of overseeing and monitoring the appraisal system, writing procedures for the employee appraisal system, and establishing timelines to evaluate each employee group annually.

The district should assign responsibility to establish procedures and schedules so that job descriptions and performance evaluations are annually reviewed, updated, and provided to district employees.

The HR administrator should begin the job description development process by gathering input from district supervisors for the purpose of revising and updating all existing job descriptions and performance evaluations, so that they clearly communicate and evaluate the district's workplace expectations. The administrator could follow these steps in considering this recommendation:

- review job qualifications for district positions and adjust as necessary, working within the superintendent's supervision;
- ensure the assigned supervisor for each position is accurate, that the compensation level is correct, and that workplace conditions are current; and

- distribute a schedule for the conduct and review of job performance evaluations of all employee groups so that the district is consistently measuring how well employees are performing their job responsibilities.

It is the HR administrator's responsibility to develop a written process to ensure employee job descriptions are regularly updated and shared with employees, and to ensure that the descriptions are signed and filed in the employees' personnel files. The administrator also has the responsibility of ensuring that supervisors complete annual written performance evaluations, that they conference with employees, and that the evaluations are filed in each employee's file in compliance with district local policy.

The district could implement this recommendation with existing resources.

COMPENSATION PROCEDURES (REC. 27)

Presidio ISD does not follow established compensation procedures for the clerical/paraprofessional and auxiliary employee groups.

In May 2007, Presidio ISD contracted with TASB to initiate a compensation study of the teacher, clerical/paraprofessional, and auxiliary employee groups. The purpose of the compensation study was to determine if employees were receiving equitable pay and if pay levels were competitive with external job markets. TASB consultants used school board-approved Presidio ISD peer groups to compare pay levels across employee groups. In addition to assessing current district pay based on job value, the study developed a plan to correct existing pay inequities and to establish a system of built-in compensation controls for the future.

As a result of the study, consultants grouped jobs of similar value into job "families" to establish pay grade classifications for the paraprofessional/clerical and the auxiliary employee groups. The study recommended using job classification and pay-grade structures as the methodology to determine compensation for employee groups, instead of using the experience-based step system the district had previously used. This approach provides equity within each pay grade and establishes built-in compensation controls. Each pay grade is built with minimum, midpoint, and maximum levels that serve as control points for the level. Employees may not be paid below the minimum or above the maximum control points in each pay grade.

Further, to correct existing internal pay inequities, the district adjusted compensation amounts for the employee groups

involved in the study, making Presidio ISD competitive with area job markets. In 2007, not only did employees involved in the study receive a general pay increase, but employees who were below the minimum of their pay levels also received additional "equity" pay to bring their pay in alignment with the study's adjusted pay levels.

The study also provided the district with a procedure to administer annual pay increases. For example, if the budget authorizes it, and the district determines it will issue pay increases in a given year, the district decides on the percentage of the midpoint amount that it can afford for each job family. The step system previously used in the district authorized pay increases based on pre-established step increases for employee groups, with the exception of teachers. This approach did not give the district flexibility to annually determine the specific amounts of pay increases it could afford. With the adoption of the compensation system, the district provided a general pay increase in 2007–08 to employee groups involved in the study.

Teachers appropriately remained on the step system compensation schedule, based on years of teaching experience verified through the Texas Teacher Service Record. It is customary in Texas to reward teachers with pay increases using the step system as teachers gain years of experience. As a result of the study's recommendations, however, the district adjusted entry-level teacher pay; adjusted pay levels in some of the steps that were below market level; increased shortage-area stipends, as evidenced by the current salary schedule; and added a master's degree stipend of \$800. With the establishment of the revised teacher-hiring schedule, the district also provided a pay increase to district teachers.

As part of the service of conducting a compensation study, the TASB vendor could also have provided recommended procedures to assist administrators in implementing the newly adopted compensation plan. After completing a compensation study, consultants are also available to advise the district on compensation matters such as how to use compensation formulas for these goals:

- determining employee promotion and demotion rates;
- providing general pay increases based on the midpoints of each pay grade; and
- providing detailed instruction in managing movement through the distinct pay grades as employees receive promotions.

However, staff interviews indicate that district leadership was not aware that such procedures existed or were available from TASB. Instead of following the compensation plan procedures for pay increases, according to interviews, school year 2007–08 was the most recent year that the paraprofessional/clerical and auxiliary pay families received pay increases. For the past several years, the district, with school board approval, has provided one-time “bonuses” of \$500 to employees in the paraprofessional/clerical and auxiliary pay families, given at the end of the calendar year. The district has also provided one administrator with two \$5,000 bonuses when the position workload significantly increased.

The district’s practice of providing bonuses to some personnel is not a function of the compensation plan, nor is it guided by policy or other written procedures to ensure that decisions are not arbitrary. Not having written policy for the awarding of bonuses may place the district at risk of inconsistently awarding employees with additional compensation.

When the district chooses to provide one-time bonuses instead of providing general pay increases, it is overriding the updating mechanisms built into the compensation plan. The overview of the district’s compensation study states that, to meet the intended long-term goals of the plan, the plan must be updated regularly and administered properly. This goal includes key salary administration activities, as described in TASB’s general compensation procedures information:

- adjusting pay ranges for job market changes;
- budgeting for annual salary increases for employees;
- placing new employees in the system; and
- calculating special increases for promotions or other job changes.

One of the benefits of providing employees with a general pay increase, when the budget allows, is to allow the district to adjust its pay range control points, which helps the district compensation program remain up to date. When the district determines the amount of an annual salary increase, pay ranges can be adjusted by increasing the minimum, midpoint, and maximum control points of each pay grade. This practice allows the district to maintain competitive salaries and checks for internal compensation equity.

Thus, by giving one-time bonuses instead of pay increases for the past five years, district pay levels may no longer be competitive with area school district job markets. A review of current district pay scales indicates that the district may have

adjusted the minimum pay levels of paraprofessional/clerical and auxiliary pay grades by adding “entry” levels amounts for each pay grade, but it has not adjusted the midpoint or maximum control points. This is another example indicating that the district is not correctly administering its compensation program.

Further, by giving one-time bonuses that do not become part of an employee’s salary history, employees do not realize increases in their annual salary levels. This may be a concern to employees who are nearing retirement age because the Teacher Retirement System (TRS) uses an employee’s highest five compensation years to determine their annual compensation upon retirement. Canutillo ISD, a small school district in west Texas, correctly administers its TASB-developed compensation plan and procedures. The district’s human resources administrator, with the help of TASB consultants, monitors the minimum, midpoint, and maximum control points of each pay grade at the time the district is considering salary increases during annual budget planning. This practice allows the district to keep its pay levels competitive with area job markets and helps to ensure internal pay equity. Since the time of the review, the district plans to have TASB conduct a new compensation review in the summer of 2014 and will revert to those recommendations, subject to the approval of the board.

The district should use the compensation program’s procedures to ensure best practices are followed.

To benefit from its investment in its compensation plan, the district should ensure that the plan’s procedures are customized to meet Presidio ISD’s needs and are closely followed. For example, providing some employees with one-time bonuses does not allow for consistent treatment among employees.

This recommendation could be implemented with existing district resources.

PROCEDURES AND MANAGEMENT OF RENTAL PROPERTY (REC. 28)

Presidio ISD rents district-owned housing units to professional employees without written policy or procedures.

Presidio ISD currently owns three houses and 40 apartments that it has purchased during the last 10 years. According to staff interviews, the housing units are used to assist in recruiting personnel. The city of Presidio, Texas, is located across the border from Ojinaga, Chihuahua, Mexico, and is about 250 miles from the closest urban U.S. city. According

to the superintendent, 90 percent of applicants withdraw their applications when they find out the district's remote location.

The district leases its housing units to administrators and teachers and collects a total of about \$10,000 per month in rent. Presidio ISD's Maintenance department maintains the housing units when they are vacant, making needed repairs or improvements. For example, a review of the district's 2012–13 Book Asset Detail (the district's annual record of capital asset activity, including depreciation rates), indicates that the district added shaded parking to some of the units in school year 2012–13.

The district rents one of the homes to the superintendent for \$390 per month; a central office administrator rents the second home for \$350 a month; and a campus administrator pays \$400 per month for the third home. The district pays for water usage for the house that the superintendent rents, while all other staff pay all utilities for their rentals.

Most of the apartments, which the district rents to teachers, have shaded parking and are located close to the schools. The monthly rent is \$315 for a two-bedroom apartment and \$495 for a four-bedroom apartment, according to district staff. Currently, the district has a waiting list for apartments, with one teacher on the list. The school board determines the rental rates for the district-owned housing, and the district has written leases on all the properties.

Interviews with the City of Presidio's office of economic development and a Presidio real estate representative found that single-family homes in the city typically rent at higher rates than the district is renting district homes. The housing expert for the Customs and Border Protection Agency reported that the federal government sets housing rates for properties the federal government owns. The Presidio housing rates for federal employees start at \$500 for a 1400-square-foot home and increase to \$800 for a larger home. This indicates that district may be renting some of its property at below market rates. Further, when district-owned apartment rates are compared to the rental rates for district-owned single-family homes, it is clear that the rates may lack consistency. For example, apartments, which are typically smaller than homes, are rented for as much as \$495 per month, whereas the three homes in the district are rented for \$350–\$400.

Document requests and interviews indicate that the district does not have any written policies or formal mechanisms to

govern how it manages its rental assets. For example, written policies that are lacking include:

- procedures to determine which central office administrators are eligible to rent a district-owned home;
- procedures to determine which teachers are eligible to rent apartments;
- procedures to determine allocation of rental units to teachers, and whether allocation should be based on seniority, income level, or other factors;
- a timeline for the school board to use in reviewing rental rates, thus ensuring that the units are priced at the correct market rate; and
- procedures to guide the school board in determining rental rates for its rental properties.

Without formal written procedures to guide the management of its housing units, the district risks allegations of disparate or preferential treatment of certain professional employees, especially given the fact that the apartment rates are set at about the same rental rates as the district's houses. Also, the district's property rental rates are likely below market, and this cost savings could be construed as an employee benefit that is not available to all professional employees, especially because there are not enough rental units for all employees. The Internal Revenue Service could consider the housing arrangement with free utilities to be a taxable benefit. Through its legal department, TASB can provide member districts with assistance in drafting local policy that will provide clear, legal procedures for management of district-owned rental properties and address any potential IRS issues.

The district should assign an administrator the responsibility of writing local policy and procedures to guide the process of determining eligibility/allocation criteria and pricing of district rental units.

The district should begin by evaluating the current process for assigning rental units to its professional employees. The evaluation should also include an analysis of rental properties in Presidio to determine if rental rates are commensurate with the current local real estate market.

The assigned administrator should develop a detailed plan for the superintendent's review that clarifies a process for how the houses and apartments will be offered to the district's professional employees and recommend, if necessary, that rental rates reflect current market value. The administrator

should also consult with TASB to ensure that all legal issues are managed properly. The superintendent should then present recommendations to the board of trustees for consideration and approval, including the recommendation that the school board develop a local policy that governs the district management of these rental units.

The district could implement this recommendation with existing resources, and may realize revenue gain over time.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL	ONE-TIME
						5-YEAR (COSTS) OR SAVINGS	(COSTS) OR SAVINGS
CHAPTER 6: HUMAN RESOURCES							
24. Assign management of human resources responsibilities to a central office administrator who should attend human resources training, develop written procedures, and supervise human resources functions.	(\$1,030)	(\$1,030)	(\$1,030)	(\$1,030)	(\$1,030)	(\$5,150)	(\$1,010)
25. Assign personnel records management responsibilities to the superintendent's administrative assistant so that all personnel records are centrally located and consistently organized and to ensure that records adhere to state, and federal rules and laws.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
26. Assign responsibility to establish procedures and schedules so that job descriptions and performance evaluations are annually reviewed, updated, and provided to district employees.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
27. Use the compensation program's procedures to ensure best practices are followed.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
28. Assign an administrator the responsibility of writing local policy and procedures to guide the process of determining eligibility/ allocation criteria and pricing of its district rental units.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	(\$1,030)	(\$1,030)	(\$1,030)	(\$1,030)	(\$1,030)	(\$5,150)	(\$1,010)

CHAPTER 7

FACILITIES MANAGEMENT

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 7. FACILITIES MANAGEMENT

An independent school district's facilities program is responsible for providing 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, while 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, condition of facilities, 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.

Presidio Independent School District (ISD) serves 1,440 total students on three campuses. These campuses include one elementary school, one middle school, and one high school. Facilities management is the responsibility of the Maintenance Department. Until approximately 18.5 months ago, the district's Maintenance and Transportation Departments were consolidated and staff reported directly to the current maintenance director. At that time, the director requested to split the departments due to increases in workload and construction activities. Currently, the departments function as two separate entities, each reporting to the superintendent. There is a total of 26 staff in the Maintenance Department. Supervisory staff includes a supervisor of building and grounds, and a custodial supervisor. Maintenance personnel include electricians, heating, ventilation, and air conditioning technicians, equipment operator, general maintenance workers, custodians, warehouse clerk, and a data specialist.

FINDINGS

- ◆ Presidio ISD lacks a comprehensive, stakeholder-driven educational facilities master plan.
- ◆ Presidio ISD lacks a systematic process for closing out construction and renovation projects.
- ◆ Presidio ISD does not use its work-order system effectively or efficiently.
- ◆ Presidio ISD has no process for tracking deferred maintenance.
- ◆ Presidio ISD does not have a process to identify, monitor, or ensure compliance with federal, state, and local regulatory requirements for facility safety and environmental health.
- ◆ Presidio ISD does not perform a cost-benefit analysis before deciding which energy efficiency upgrades provide the best return-on-investment to the district.

RECOMMENDATIONS

- ◆ **Recommendation 29: Develop a comprehensive, stakeholder-driven educational facilities master plan.**
- ◆ **Recommendation 30: Expand closeout procedures for construction and renovation projects.**
- ◆ **Recommendation 31: Use the automated work-order system to its capacity.**
- ◆ **Recommendation 32: Develop a process to document and address deferred maintenance.**
- ◆ **Recommendation 33: Develop a safety and environmental checklist to ensure all regulatory agency requirements are met.**
- ◆ **Recommendation 34: Perform a detailed energy and cost assessment to support planning for future energy-related improvements.**

DETAILED FINDINGS

FACILITIES MASTER PLAN (REC. 29)

Presidio ISD lacks a comprehensive, stakeholder-driven educational facilities master plan.

In August 2011, Presidio ISD hired an architectural firm to develop a facilities planning model that included a review of existing district facilities and plans for expansion. However, the resulting plan was not comprehensive and was limited to a theoretical overview of the physical capabilities and constraints of each school. The plan did not include all the essential data elements necessary for a facilities master plan because it was a planning model and was not meant to be a master plan. Specifically, the plan lacked or inadequately developed the following components:

- preferred grade configurations;
- school attendance boundaries;
- school capacity information;
- utilization;
- functional adequacy assessments (e.g., educational suitability, access for disabled persons, etc.);
- building condition assessments (to include analysis of structural, mechanical, electrical, accessibility, and life safety code);
- site assessment information; and
- capital construction costs, including all “soft costs” such as conceptual design to final design, environmental impacts, and permits.

Interviews conducted by the review team found that maintenance staff members were not aware of a formal facilities review process or an evaluation of future facility needs. Further, staff were not included or asked to give input into the facilities planning model or any recent capital improvement projects in the district. Staff reported that decisions regarding new facilities projects appear to be communicated to select personnel on a “need-to-know” basis.

In addition, although a number of capital projects have either been completed or are currently underway, there was no evidence that projects underwent a thorough planning phase or that priority projects were identified through a needs assessment consistent with the components of a facilities planning model. Although the district received recommendations for new projects from the architectural firm that developed the facilities planning model, maintenance staff expressed concerns that some of the district’s most pressing needs were not being addressed. For example, the district just completed construction of an

exercise space at Franco Middle School, which the community at-large will use for after-school classes. However, according to district staff, the high school is also in immediate need of additional space for athletics.

Without a comprehensive facilities master plan based on needs assessment and staff input, the district is unable to ensure that school district resources are directed to meeting the highest priorities. The lack of a facilities master plan may result in underutilized schools and increased operating costs. Without a facilities master plan, a district cannot effectively schedule and budget funds to properly maintain and enhance its facilities.

An education facilities master plan ensures congruence between educational priorities and capital resources. Effective educational facility planning is usually based on the following components:

- educational programs that are identified to be delivered in the facilities;
- student demographic information that is accurate to ensure that new facilities are located in appropriate areas of the school system and are designed to optimum capacity;
- safety and security needs assessment for contemporary educational settings;
- facilities specifications that are responsive to the current and future educational needs of the students and related instructional programs;
- designs that enhance aesthetics, provide a positive learning climate, and enrich opportunities for learning; and
- configurations that permit routine maintenance of equipment and buildings with minimal interruption of ongoing programs.

According to the National Center for the 21st Century Schoolhouse, in developing a comprehensive master plan, districts should engage the community and work publicly to develop facilities with a learner-centered focus. To achieve this, districts typically include key staff in needs assessments and other decision-making processes, analyzing existing conditions and needs, and providing feedback throughout plan development. Effective plans ensure that all students have equal access to a learning environment that supports strong instructional programs and identifies and prioritizes facilities improvements or replacements.

When developing a master plan, a working committee of key district stakeholders is typically established to provide input. Key stakeholders include, but are not limited to: the superintendent, board, principals, department heads, and parents. A master plan usually includes the following components:

- executive summary;
- background and demographic information;
- school district facility assessments;
- technology plan;
- strategic plan for implementation; and
- operations (all functions) cost-impact model (best-case, worst-case, most probable-case).

The Texas Association of School Administrators (TASA) offers facility-planning services to Texas school districts that include a detailed study of current facilities and projected building needs as well as demographic analysis and enrollment forecasts. TASA's comprehensive school facility study includes the following:

- an extensive evaluation of the condition and educational functionality of existing buildings and sites;
- a capacity analysis of all district education facilities, reflecting the district's instructional program;
- an evaluation of each campus and facility to determine its best use in light of local programs and state staffing and space requirements;
- a determination of technology capabilities within existing facilities;
- an overview of state and federal regulatory requirements;
- recommendations and options available to the district to meet current and projected facility needs; and
- a five-year enrollment forecast by grade and by campus for the entire district.

The district should develop a comprehensive, stakeholder-driven educational facilities master plan.

The superintendent should meet with the district leadership team to develop a master planning process, working group, timeline and budget. Members of the working group would include board members, the superintendent, district and

campus staff, parents, other community members and even students. At a minimum, the plan should be comprised of three major components:

- the school district's background and demographic information;
- a facility assessment of all buildings belonging to the school district; and
- a strategic plan to implement facility improvements identified in the facility assessment.

The district could implement this recommendation with existing resources.

Since the time of the onsite review, the district reports that they have contracted with a firm for a directed design study on the remaining facilities needs of the district.

CLOSEOUT PROCESS (REC. 30)

Presidio ISD lacks a systematic process for closing out construction and renovation projects.

Presidio ISD recently completed a number of construction and renovation projects, including an exercise room at the middle school and solar energy projects at the elementary school and high school. In addition, the central administration building was being renovated at the time of the onsite review. However, there was no evidence that Presidio ISD engages in formal project closeout procedures for either self-performed projects or contracted projects. District staff did not have the following items on file: a formal closeout checklist, a list of closeout items, or warranty and guarantee information for any of the recent projects. Further, there was no evidence that installed equipment met specifications, and it was unclear whether the district or the vendors were responsible for any warranty issues.

Project closeout is a critical step in the construction process in which the school district and vendors complete their contractual obligations with each other. The process involves documentation of project completion, notation of any issues or work still to be resolved, and specifications for the continued operation and maintenance of the completed project. In terms of contractual obligations, closeout confirms that there are no outstanding claims and that all governmental approvals have been achieved. To support continuing maintenance of the building, closeout provides all required warranties, a final list of subcontractors, maintenance manuals, preventive maintenance schedules, training manuals, and as-built drawings and documents that show all

concealed conditions that maintenance staff may need for conducting ongoing maintenance, repairs, and renovations. Not implementing project closeout processes could expose the district to risk and potential loss if contractual obligations are not met and/or facilities and equipment do not function as intended.

According to The Associated General Contractors Association's 2012 publication *The Texas Closeout Manual for K-12*, the keys to successful project closeout are defining the project-specific closeout procedures and appropriately communicating them to all parties involved, including procurement, business services, facility management, and finance. Procedures apply to most or all members of a project team, including school district staff, design team professionals, contractors, subcontractors, suppliers, vendors, and the community. All parties involved share a common goal to deliver a building that efficiently accommodates the needs of students, teachers, administrators, and other district functions.

Design firms and contractors all have their own internal closeout procedures and bring their own interpretations of what is required and who is responsible for different aspects of project closeout. If requirements are not specifically itemized and agreed upon, different team members may take a different approach to record keeping, which can cause the district to reject certain documents, making the preparers spend extra time on the back end and delaying the closeout completion.

School districts often rely heavily on architects or construction project managers to oversee the project closeout review process. However, because their retainage and final payment are tied directly to project closeout, contractors have a vested interest in expediting the process. Contractors also need to move personnel to full-time commitments on other projects. Subcontractors who have met all their contractual obligations are often penalized when other subcontractors or the general contractor fail to complete their closeout obligations, which delays payment to the entire construction team. Sometimes contractors who are relatively new to K-12 educational facilities construction may struggle with closeout procedures, which may require multiple re-submittals for final acceptance.

Discussions about closeout requirements often take place during project kick-off and cover such topics as:

- closeout requirements, including desired form of record drawings, and a master checklist to incorporate into the project manual;

- strategies, including contractual arrangements and future project selection criteria, to be incorporated into the project manual and contracts to expedite project closeout;
- roles and responsibilities, including expectations for continuity from design and construction phases;
- review of timelines; and
- final audit processes.

Closeout procedures often include the completion of certain activities and the gathering of key documents as outlined below:

- release of liens;
- warranties and guarantees;
- material affidavits;
- operation and maintenance manuals;
- record drawings, including site irrigation drawings;
- conformance documentation and testing/commissioning;
- turnover items;
- all financial documents, including contracts, payments, retainage, etc.;
- insurance policies;
- training and demonstrations; and
- substantial completion checklists.

In defining closeout procedures, the following are various deliverables that the contractor and subcontractors often provide:

- a consolidated list of closeout requirements;
- updated record drawings;
- unconditional final lien releases, or a lien waiver, which is a document from a contractor, subcontractor, equipment lessor, or other party to the construction project (the claimant) stating they have received payment and waive any future lien rights to the property (of the owner);
- dispute resolutions procedures between the contractor and a subcontractor; and
- procedures in the case of subcontractor default.

- Americans with Disabilities Act standards inspections;
- project change orders at project end; and
- construction and project closeout list items.

The district should expand closeout procedures for construction and renovation projects.

The maintenance director should work with procurement staff to draft language regarding detailed, mandatory closeout procedures required on all major equipment purchases and construction projects for the district and submit mandatory requirements for board approval.

Once the closeout checklist is developed, it should be approved by the Board of Trustees. The district should subsequently require that all final closeout documentation or certificate of satisfactory completion be submitted to the board on all district construction projects.

The district could implement this recommendation with existing resources.

WORK-ORDER SYSTEM (REC. 31)

Presidio ISD does not use its work-order system effectively or efficiently.

The district's Maintenance Department purchased a newer work-order system for \$5,000 that would track maintenance of building assets, transportation assets, and corrective work orders. This was done with the intention of replacing an older, outdated system. However, during the onsite review, both systems were still being used. The new system is used to keep track of the district's preventive maintenance work orders, while the older system is still used to keep track of the corrective work orders.

Preventive maintenance work orders are generated on a schedule or by frequency rather than by request. Corrective maintenance work orders are typically generated in the older work order system by the maintenance director or maintenance staff. Corrective maintenance work orders can result from a service call from a school district employee or observation of conditions during performance of preventive maintenance work.

The district has not fully implemented the new work-order system due to a lack of staff training. Work orders generated through the new system are printed and issued in hard copy to staff. Once staff performs maintenance, they manually complete the work order and turn it in to director for

processing. Only the director received training on the new system.

Partial and inefficient use of the automated work-order system forces staff to rely on manual processes that are time consuming and error prone. Presidio ISD implemented the new automated work-order system to request, prioritize, and track its work orders, yet the district is not using the system to its full capacity and has not trained backup staff to maintain the system.

Further, there is no formal tracking of the quantity or backlog of work orders or supervisory inspection of completed work orders to ensure that work was properly and timely completed. An effectively used automated work-order system provides users with a convenient way to submit work order requests, track project progress, and monitor staff performance.

According to the *Best Practices Maintenance Plan for School Buildings*, published in 2006 by the Department of Education in Idaho, 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 personnel typically face. Using work orders for upcoming preventive maintenance tasks helps ensure that this work does not get abandoned amidst multiple maintenance jobs.

By analyzing completed work orders, managers can track recurring problems in a piece of equipment, for example. Work orders can also provide a written record of parts needed for the job as well as completed work each day, the number of hours to complete tasks, and feedback on the completed work. In this way, more sophisticated work-order systems provide information for equipment needs and measuring worker productivity.

For many districts, particularly those with multiple buildings, keeping accurate records means having a system for retaining and managing their maintenance information. The purpose of an automated work-order system is to ensure that building managers have sufficient information to properly oversee maintenance work. The system also allows managers to compare budgeted to actual costs and evaluate department performance. Information on maintenance histories can help determine equipment's expected remaining life spans. Trend data on maintenance and repair costs provide useful information for estimating budget items.

The district should use the automated work-order system to its capacity.

The district should work to fully transition away from the older system and use only the newer system. To do this, the district should train department staff to enter all open and completed work orders in the automated work-order system, maintain the system on a timely basis, and require administrators to submit requests through the district's network. The maintenance director should issue a notice to district staff explaining that the automated work order system must be used to submit requests, provide easy-to-use instructions for submitting requests, and enforce the process. Also, the director should run reports for the current period to determine and confirm work order status.

A one-time cost for the software vendor to assist with systems consolidation and testing is anticipated at \$2,500 (\$125 per hour x 20 hours).

Since the time of the onsite review, the district reports that it has continued to transition to the new system.

DEFERRED MAINTENANCE (REC. 32)

Presidio ISD has no process for tracking deferred maintenance.

Deferred maintenance is the practice of postponing maintenance activities, such as repairs, on both real property (i.e., infrastructure) and personal property (i.e., machinery) to save costs and meet budget funding levels. When requested, Presidio ISD provided no documentation of a planned, organized process or procedure for identifying or addressing deferred maintenance for its buildings and equipment. Some information indicated that the district's deferred maintenance activities were outsourced; however, district staff interviewed did not appear to be familiar with the concept of deferred maintenance. Instead, the district's philosophy is to complete repairs as needed and they do not view any maintenance issues as deferred.

A formal deferred maintenance plan ensures that assets are adequately maintained. Our review of work order reports revealed a number of district assets with deferred maintenance, including several related to the HVAC. To ensure that assets are properly maintained and that they reach their full life-cycle, districts typically implement a more comprehensive and reliable method of tracking the maintenance of their valuable assets.

Deferred maintenance can be prevented if proper preventive maintenance procedures are implemented and used by school districts. Priorities school districts should consider in developing a quality school maintenance program include:

- commitment on the part of the board, the superintendent, and senior staff to facility maintenance;
- development of a comprehensive preventive maintenance program;
- funding that is adequate for both preventive maintenance and capital improvement;
- consideration of new ideas for construction and maintenance of facilities;
- search for new and different ways to pay for maintenance and construction needs;
- review of district goals and policies to make sure facility management receives appropriate levels of funding in the annual budget cycle; and
- linking of academic programs to facility needs through a plan.

The district should develop a process to document and address deferred maintenance.

The maintenance director should develop a deferred maintenance schedule along with a detailed backlog of all district maintenance activities and prioritize these activities by building and equipment. The director should use the work-order system to reduce and update the backlog. Reports should be run monthly showing the deferred maintenance status and results. A timeline for performing deferred maintenance activities should also be clearly established.

The district could implement this recommendation with existing district resources.

FACILITY SAFETY AND ENVIRONMENTAL HEALTH (REC. 33)

Presidio ISD does not have a process to identify, monitor, or ensure compliance with federal, state, and local regulatory requirements for facility safety and environmental health.

The district does not have a facility-related safety and environmental compliance program in place. Aside from routine maintenance responsibilities, the Maintenance Department is also engaged in construction and renovation projects. The construction industry has far more stringent

safety requirements than the general industry requirements—particularly as it relates to the Occupational Health and Safety Association (OSHA). To satisfy a number of regulatory requirements, maintenance personnel are required to be trained or certified.

It is essential that a district's facilities function take into account safety, health, and environmental aspects of school district operations and maintenance. Without a comprehensive compliance program of federal, state and local statutes, the district could be subject to citations, fines, and even closure. Maintenance of elevated pieces of equipment, for example, requires aerial lift certification by the State of Texas. Fines or citations may be issued if requirements or training are not met. Texas Commission on Environmental Quality (TCEQ) cited the district on December 11, 2012 for failure to maintain and test its underground storage tanks (USTs).

The National Center for Education Statistics (NCES) offers a comprehensive plan for school districts to develop their own safety and environmental compliance programs. This planning guide provides a safety and environmental checklist to ensure that all safety, health, and environmental regulatory requirements, at the federal, state, and local levels are addressed. Specific chapters and topics include:

- safe environments for learning;
- environmental safety;
- indoor air quality;
- asbestos;
- water management;
- waste management;
- environmentally friendly schools;
- securing school facilities;
- locking systems;
- equipment protection (lock-out/tag-out);
- visibility;
- fire protection;
- crisis management/disaster planning;
- workplace safety; and
- environmental safety checklist.

The district should develop a safety and environmental checklist to ensure all regulatory agency requirements are met.

The maintenance director should develop a comprehensive list of federal, state, and local requirements that include but are not limited to the following considerations:

- jurisdiction and category (federal) regulations;
- agency (TCEQ) regulations;
- frequency of compliance (annual);
- effective dates of compliance (January 14, 2013 through January 13, 2014);
- requirements for current certificate or compliance notice; and
- application or request form along with instructions.

The district could implement this recommendation with existing district resources.

ENERGY EFFICIENCY (REC. 34)

Presidio ISD does not perform a cost-benefit analysis before deciding which energy efficiency upgrades provide the best return-on-investment to the district.

The district completed a number of energy retrofit projects to reduce energy consumption and energy costs, investing nearly \$3 million in the following upgrades:

- heating, ventilation, and air conditioning (HVAC) at the high school;
- lighting and electrical throughout the district; and
- two solar projects—one at the elementary school and one at the high school.

To offset the cost of these upgrades, the district applied for a series of grants. The State Energy Conservation Office (SECO) awarded Presidio ISD a \$250,000 grant to install a 72-kilowatt roof-mounted, grid connected solar photovoltaic (PV) system at the elementary school. The SECO grant requires a district match of at least 20 percent of the project costs.

The district reported that these upgrades save \$5,000 per month, or \$60,000 per year in energy costs. However, the review team could not find any energy models or financial models to validate these claims. Assuming a pay-back of the nearly \$3 million in energy upgrades, it would take 48 years

to pay for these upgrades—considerably more than the assets’ life-cycle, as shown in **Figure 7–1**.

**FIGURE 7–1
PRESIDIO ISD ENERGY UPGRADES AND PAYBACK
2011**

ENERGY UPGRADES	COSTS
High School HVAC	\$1,330,846
Districtwide Lighting Upgrades	\$1,004,597
Solar Panels	\$559,446
Total	\$2,894,889
Annual Energy Savings	\$60,000
Payback (Years)	48
Maximum Lifecycle of Upgrades	25

SOURCES: Presidio ISD Asset List; School Review Team Interviews; RSMMeans cost data.

According to the U.S. Department of Energy, Douglas County School District in Nevada faced a challenging combination of aging equipment and buildings (most over 37 years old), rising energy costs, and limited access to taxpayer funds. The district chose to invest almost \$5.1 million in energy-related improvements and negotiated a tax-exempt installment purchase agreement with a bank at 4.12 percent over 15 years to fund the work. In 2008, less than 18 months after initiating the project, the work was complete and already providing significant savings to the district. This first phase of work was projected to produce in excess of \$450,000 in utility bill savings annually. The district now expects to realize almost \$9 million in utilities savings over 15 years from the original \$5.1 million investment with approximately \$1.4 million in cumulative net cash flow.

The district should perform an energy and cost assessment to support planning for future energy-related improvements.

To fully appreciate the benefits of energy retrofits, the district should develop a baseline of its assets, energy consumption, and costs. The maintenance director should develop an overall energy management policy and energy conservation plan for the district. The board, superintendent, principals, teachers, students, cafeteria workers, facility manager, and cleaning crews should all be involved in developing the energy policy and plan. Problems should be prioritized and a process set in place to determine what changes can realistically be made through short- and long-term goals to increase energy efficiency in buildings.

The district should then perform a detailed energy and cost assessment regarding energy-related improvements, to include:

- a baseline analysis of existing facilities and equipment, energy consumption, utility rates, energy costs, maintenance costs, and hours of operation;
- a post-installation assessment of same;
- a payback (in years) based on the total cost of the project(s); and
- life-cycles of new equipment, and future repair replacement costs.

Because the idea is to save money and energy, whenever money is spent there should be a clear cost-benefit analysis that shows the expected return on the investment. The board should hold the director responsible for implementation and hold him accountable for the results promised. The annual budget should contain funding to keep all equipment operating at peak efficiency through preventive maintenance and planned replacement.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 7: FACILITIES MANAGEMENT							
29. Develop a comprehensive, stakeholder-driven educational facilities master plan.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
30. Expand closeout procedures for construction and renovation projects.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
31. Use the automated work-order system to its capacity.	\$0	\$0	\$0	\$0	\$0	\$0	(\$2,500)
32. Develop a process to document and address deferred maintenance.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
33. Develop a safety and environmental checklist to ensure all regulatory agency requirements are met.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
34. Perform a detailed energy and cost assessment to support planning for future energy-related improvements.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	(\$2,500)

CHAPTER 8
CHILD NUTRITION SERVICES

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 8. CHILD NUTRITION 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 is a federal entitlement program administered at the state level by the Texas Department of Agriculture. 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 percent of their students are eligible to receive free or reduced-price meals. The National School Lunch Program 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 operations 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.

Food service operation is dependent on the organizational structure of the district. The three primary models of organizing food service operations are self-management, contracted management, and contracted consulting. Using the self-management model, a district operates its food service department without assistance from an outside entity. Using a contracted management model, a district contracts with a food service management company to manage either all or a portion of its operations. In this arrangement, a district may rely on the company to provide all or some staff, or may use district staff for its operations. Using a consulting model, a district contracts with a food service consulting company to provide guidance on food service operations (e.g., menus, sales and marketing plans, and ordering processes based on industry standards, etc.). In this arrangement, district staff would operate the food service department.

Presidio Independent School District (ISD) participates in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP). Operating under Provision 2 of the program (both breakfast and lunch are provided to all

students at no charge), a daily count of student breakfasts and lunches served is taken. The percentages for free, reduced-price, and full-price meals, developed in the initial year of Provision 2, are applied to the total meal counts to determine the federal reimbursement that the district receives. Each of the three campuses has an on-site preparation kitchen and dining room. The district serves breakfast-in-the-classroom to students in grades pre-K–2; all other grade levels eat both breakfast and lunch in their respective cafeterias.

The district also participates in the Summer Food Program each year for a period of 30 days during the months of June and July. Participation is high during the operation of summer school; however, it drops once classes end. According to the business manager, the district has not considered participation in the Afterschool Snack Program.

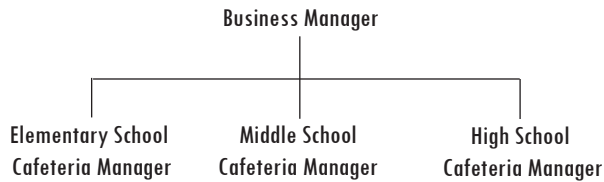
The Child Nutrition Programs (CNP) are funded by federal reimbursement, state matching funds, and local revenues from the sale of meals and a la carte foods. The Presidio ISD CNP does not provide any other services, such as catering or vending.

Presidio ISD self-operates their CNP. The Food Services Department consists of the business manager, serving as a part-time food services director (8.6 percent of her salary is paid from CNP funds, and she completes standard forms such as the application agreement and the reimbursement claims), three cafeteria managers, and the equivalent of 24.5 eight-hour food service employees. Cafeteria staff report directly to the cafeteria manager of each individual school. Each cafeteria manager independently reports directly to the business manager as shown in **Figure 8-1**.

All district campuses are closed; a few students do occasionally bring breakfast or lunch from home. Basically, the school cafeterias have no competition.

The food service operating budget for school year 2012–13 includes \$958,762 in revenue and \$1,055,682 in expenditures. According to the business manager, the district supplemented the CNP during school year 2012–13 with \$62,641 in local funds, in addition to providing utilities and other indirect costs.

FIGURE 8–1
PRESIDIO ISD ORGANIZATIONAL CHART
SCHOOL YEAR 2013–14



NOTE: Adapted from the 2013–14 Presidio ISD Organizational Chart.

SOURCE: Presidio ISD.

During September 2013, the average daily participation (ADP) in the NSLP was 1,322, (92 percent of 1,440 enrolled students), and the ADP in the breakfast program was 871 students, or 61 percent of enrollment.

FINDINGS

- ◆ Presidio ISD has not centralized the administration of financial management, food production, training and staff development, and compliance.
- ◆ Presidio ISD has not developed district standards for food, labor, and non-food expenditures as a percentage of revenue, or monthly profit and loss statements identifying actual current expenditures by school.
- ◆ Presidio ISD has not developed a staffing formula based on productivity to determine the number of labor hours necessary to operate each of the district kitchens.
- ◆ Presidio ISD did not secure approval from the Texas Department of Agriculture (TDA) for an alternate Point-of-Service (POS) collection method used for counting and claiming breakfasts served in the classrooms in grades pre-K–2.
- ◆ Presidio ISD claimed reimbursement for breakfasts that may not be consistent with meal pattern requirements as served.
- ◆ Presidio ISD does not maintain adequate documentation of the contribution of the foods served to the meal patterns.
- ◆ Presidio ISD does not monitor and control food costs in the Child Nutrition Programs (CNP).

- ◆ Presidio ISD does not perform a cost analysis of the value of commodity processing versus receiving brown box United States Department of Agriculture (USDA) Foods to determine which is most financially beneficial to the Child Nutrition Programs (CNP).
- ◆ Presidio ISD has not effectively implemented the Offer versus Serve (OVS) provision of the School Breakfast Program (SBP) and National School Lunch Program (NSLP) in all district schools at all age/grade levels.
- ◆ Presidio ISD does not monitor plate waste and adjust menus accordingly.

RECOMMENDATIONS

- ◆ **Recommendation 35: Create an administrative position, food services director, reporting to the business manager.**
- ◆ **Recommendation 36: Develop district standards for the Child Nutrition Programs (CNP) expenditures (food, labor, and non-food) as a percentage of revenue, reducing expenditures to levels that do not exceed revenue.**
- ◆ **Recommendation 37: Develop and use a staffing formula based on meals-per-labor-hour and make adjustments in the number of labor hours as productivity and revenue fluctuates.**
- ◆ **Recommendation 38: Develop and submit for approval to the Texas Department of Agriculture (TDA) a revised *Policy Statement for Free and Reduced-Price Meals – Attachment B: Meal Count/Collection Procedure(s)* for breakfast-in-the-classroom served at the elementary school, grades pre-K–2.**
- ◆ **Recommendation 39: Ensure that each of the required items offered as part of a reimbursable meal contributes sufficient amounts to meet the requirements of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal patterns.**
- ◆ **Recommendation 40: Review, adjust, and standardize all district recipes to ensure that stated yields of portions and contribution are correct, and monitor food production records and the Child Nutrition (CN) label or product analysis**

sheet files for each of the schools to ensure that sufficient documentation is available to support the district reimbursement claims.

- ◆ **Recommendation 41: Identify the target food cost for breakfast and for lunch based on the average per meal revenue available and the food cost as a percentage of revenue based on an evaluation of the affordability of each menu item prior to placing it on the menu.**
- ◆ **Recommendation 42: Designate a district employee to manage all United States Department of Agriculture (USDA) Foods-related activities including researching and performing a detailed cost analysis of the options available for making full financial use of the annual commodity foods entitlement.**
- ◆ **Recommendation 43: Implement the Offer versus Serve (OVS) provision effectively for breakfast and lunch in all grade levels in all district schools.**
- ◆ **Recommendation 44: Monitor and reduce plate waste.**

DETAILED FINDINGS

CENTRALIZED FOOD SERVICE MANAGEMENT (REC. 35)

Presidio ISD has not centralized the administration of financial management, food production, training and staff development, and compliance.

The Presidio ISD business manager devotes 8.6 percent of her time performing some of the duties of a food services director; however, many tasks typically performed by a full-time food services director are left undone or performed by the Regional Education Service Center XVIII (Region 18) Child Nutrition (CN) specialist through generic management tools such as a cycle menu, recipes, purchase order guides, and partially completed food production records. Some policies are set by each of the three independent cafeteria managers making individual decisions on program operations.

Without centralized administration of food service, some practices may not be monitored. One example is the district cycle menu. Presidio ISD is using a generic menu provided by Region 18. When executed properly, this menu provides assurance that all program regulations related to the new meal patterns are being met; however, the students and

adults, including the food service staff, have voiced dissatisfaction with the menu offerings, participation has dropped, and waste is at an all-time high.

Two of the district's three cafeteria managers do not feel comfortable changing the menus in any way to accommodate the feedback they are receiving from the school community. Menu items such as tangerine chicken, stromboli, and stuffed baked potatoes are not popular with Presidio ISD students, according to the cafeteria managers. The high school manager indicated that she changes the menu according to student preferences, and waste at the high school is less than at the other two schools. The other managers are following the directions of the Region 18 CN specialist and hesitate to make any change, even a minor one such as adding salsa to a breakfast taco to improve the flavor.

Two years ago, the superintendent initiated a soup and salad bar. It was placed outside of the serving area in each school where students and adults could supplement their lunches with various fruits and vegetables. This offering was an immediate success and participation was high. Deemed as offering too much fat, salt, and starch, the district removed the meats from the soup, the mayonnaise-based combination salads, and the starchy foods such as pasta and potato salad because these offerings had too much fat, salt, and starch. The bar remains, but the offerings are limited generally to vegetable soup and raw vegetables. After this action was taken, participation dropped. The elementary and middle school managers question the value of preparing this bar daily based on lack of use. High school participants continue to consume all of the daily soup; however, they consume very little of the raw vegetables.

There is no centralized food service function, so a cost-benefit analysis of the continued use of the salad bars in all schools has not been completed. Other activities that have not been conducted include: research of new and inviting food items that reduce fat, salt, and starchy foods but are popular with student and adult customers, or an evaluation if the popular soup at the high school should be continued, but served as a vegetable choice from the serving line instead of at the soup and salad bar.

Some of the recipes used by the district have not been refined. Several of the recipes as interpreted by the cafeteria employees do not meet federal requirements while others exceed requirements, making them more costly than necessary. Many recipes have not been reformatted and structured to yield a standard 50 or 100 servings, which would reduce the

workload for food production staff. The development of a standardized food management system, including standardized recipes is an important duty of a food services director.

The number of employees in the district kitchens may not be consistent with industry standards. There is no district staffing formula to determine the number of labor hours needed based on productivity, district menus, and the types of services offered. Because menus are written outside of the district, the flow of work in Presidio ISD kitchens is not specifically addressed. The work flow in each of the kitchens as it relates to the menu, including detailed menu-specific work schedules, and an analysis of the number of staff has not been conducted due to the lack of a central administration of food service.

Another issue that has developed as a result of a lack of central administration over food services is a disconnect between food orders and food needs. Food was stacked on the floor of the walk-in freezer at the middle school, and it was difficult to enter the area to retrieve foods or monitor inventory. The middle school also had oil in the dry storage area. The manager indicated that there is no longer a use for it due to the current cycle menu. The business manager/food services director explained that the commodity delivery is only once every three months; therefore, large amounts must be ordered. Now that the menus are written outside the district, the items ordered by the business manager/food services director may or may not meet the requirements of the menu, thereby increasing the potential for the commodity food inventory to build. The Region 18 menus have not been adjusted for available USDA Foods, nor has an analysis of the in-house inventory and needs for each three-month delivery.

CNPs are most successful when they operate from a centralized, standardized food production management system. In any school food service operation, the menu drives kitchen activities, determines compliance with program meal pattern requirements, and most importantly, influences whether or not students and adults elect to participate in the program. The acceptability of the menus ultimately determines if meals are contributing to the health of the students, in line with the program goals of providing nutritious meals to all students. Discarded food provides no nutritional benefits.

Centralized management provides the ability to control consistent quality throughout the district schools. Another important benefit is assurance of compliance with USDA regulations. Although the business manager/food services director is always available to the cafeteria managers to support them in solving problems, she only devotes a small portion of her time to food service operations. Researching, developing, monitoring, evaluating, adjusting, and communicating elements of a standardized food service management system is a full-time job when executed properly in a district with three kitchens.

Best practices dictate that when a district has more than one kitchen, a designated employee (in some districts, it is a lead manager; in most districts it is a food services director) is responsible for centralizing and administering the financial management, food production, training and staff development, and compliance within the Food Services Department.

Specific duties typically performed by a food services director include but are not limited to:

Financial Management and Recordkeeping/Reporting

- projecting the annual operating budget and managing the budget on a monthly basis, tracking revenue and expenditures for each kitchen by object codes, and initiating change as necessary;
- developing, implementing, and monitoring internal controls to ensure financial accountability and program integrity (e.g., establishing inventory management and control systems, implementing and monitoring a reliable system of cash management, and maintaining the fixed asset inventory);
- projecting revenues and expenditures, projecting operating costs based on meal equivalents, and preparing justification for budget requests;
- recommending meal and a la carte sales pricing;
- overseeing payment of invoices in an accurate and timely manner;
- preparing required reports; and
- retaining appropriate financial and participation records.

Food Production and Service

- planning and managing cycle menus for breakfast, lunch, snack, summer and catering programs;
- ensuring that meals and/or snacks served to students meet USDA requirements;
- establishing quality control procedures for every preparation, including recipes following USDA guidelines, standardized to district kitchens according to district goals, to ensure that consistently high quality menu items are served;
- establishing, implementing, and evaluating quality standards for purchased-prepared products and conducting taste testing of various brands of products used, and new menu items;
- ensuring production records are completed accurately each day in each school within the district; and
- planning/overseeing special events catering.

Compliance

- ensuring an accurate meal counting/claiming system throughout the district;
- ensuring compliance with state and federal regulations and recommendations;
- conducting routine on-site reviews of all facilities operated by the district;
- implementing corrective action when needed to address any deficiencies identified within the district's CNP; and
- monitoring the district's use of federal funds to ensure they are used only for allowable purposes.

Personnel Management

- preparing job descriptions and work schedules;
- interviewing candidates for employment, making hiring decisions, and preparing required documents for personnel decisions;
- supervising personnel within the CNP;
- developing and implementing an employee performance management system, and maintaining appropriate personnel records;

- conducting appropriate staff meetings;
- determining staff training and development needs and implementing appropriate programs; and
- establishing a staffing formula for schools to ensure optimal productivity, balancing labor and food costs to promote operational success.

Purchasing and Contracting

- monitoring the terms and conditions of all contracts to ensure contractor compliance;
- overseeing testing of products;
- developing and submitting Requests for Proposals for non-food items, including equipment, technology/software and services; and
- enforcing the district's Procurement Code of Ethics to ensure integrity in the procurement process and prevent potential conflicts of interest.

Equipment/Facility Management

- evaluating facility and equipment needs for the CNP;
- coordinating maintenance and repair of equipment and facilities with internal and external sources; and
- conducting follow-up on completed repairs and maintenance.

Marketing and Public Relations

- developing social marketing plans to involve students, parents, school personnel and community partners in the district's CNP;
- seeking and responding to student, parent, media, community and other concerns;
- maintaining relationships with community agencies and collaborating to achieve mutual goals; and
- preparing appropriate newsletters, news releases, and brochures to inform, involve and engage the community in various CNP initiatives.

The district should create an administrative position, food services director, reporting to the business manager.

Once in place, the food services director could begin centralizing the operations by developing an integrated standardized food management system, using the cycle menus and other production tools developed by Region 18 as a base. The steps for doing this include:

- using tray waste surveys conducted in each school, input from students, food service staff and other adults in the school community, and a list of available USDA foods, outline potential changes to the menus that would make them more acceptable to the customers of the school cafeterias;
- discussing potential changes with the Region 18 CNP Specialist to determine how these changes will affect compliance with the meal patterns;
- determining the potential for revitalizing the soup and salad bar use in each of the schools and deciding if they should continue to be used, or the popular soup at the high school put onto the serving line as a daily vegetable offering and the other offerings discontinued (reducing the need for labor and potentially reducing waste);
- evaluating all needed recipes against the yield tables of the Food Buying Guide for Child *Nutrition Programs* (FBG) once the cycle menus are finalized, customizing them to the goals of the district, and standardizing them to produce 100 servings; and
- analyzing the work done throughout the day in each of the kitchens, including the following:
 - outlining the major duties required to produce, serve, and clean-up during the normal production day;
 - breaking duties down into specific tasks and assigning a projected time to perform each task; assigning duties and tasks to each employee to formulate routine daily work schedules to ease the workflow;
 - focusing the staff on menu-specific tasks necessary for each day of the cycle menus and determining whether or not labor hours can be reduced; and
 - developing a staffing formula based on productivity and other factors to use districtwide.

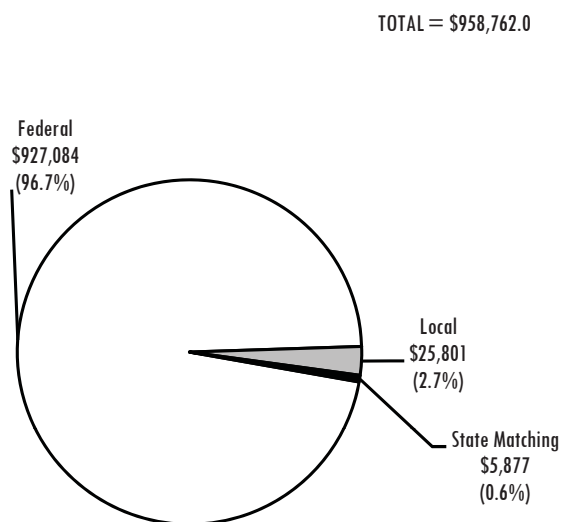
The cost of hiring a food services director varies by region, size of the district, and qualifications required of the applicant. The fiscal impact assumes that the median annual salary for a food services director is \$35,849 plus district benefits at an estimated 15 percent, for a total annual fiscal impact of \$41,226.

DISTRICT STANDARDS FOR CHILD NUTRITION PROGRAM EXPENDITURES (REC. 36)

Presidio ISD has not developed district standards for food, labor, and non-food expenditures as a percentage of revenue, or monthly profit and loss statements identifying actual current expenditures by school.

Because Presidio ISD has not developed profit and loss statements for food service operations, the review team developed the revenue and expenditure statements shown in **Figures 8–2** and **8–3**. In addition to federal, state, and local funds used to support food service operations, the U.S. Department of Agriculture (USDA) provides USDA Foods to school districts. Presidio ISD received \$58,969 in entitlement value for the school year 2012–13. This analysis does not include USDA Food entitlements.

FIGURE 8–2
PRESIDIO ISD
SOURCES OF CHILD NUTRITION PROGRAM FUNDING
SCHOOL YEAR 2012–13



NOTE: Totals may not sum due to rounding.
SOURCE: School Review Team interviews with the Presidio ISD business manager.

FIGURE 8–3
PRESIDIO ISD OPERATING COSTS AS A PERCENTAGE OF FOOD SERVICE TOTAL REVENUE
SCHOOL YEARS 2010–11 TO 2012–13

EXPENDITURES	2010–11	PERCENTAGE OF TOTAL REVENUE	2011–12	PERCENTAGE OF TOTAL REVENUE	2012–13	PERCENTAGE OF TOTAL REVENUE
Food	\$513,191	54.95%	\$539,652	55.90%	\$542,375	56.57%
Labor	\$426,638	45.68%	\$413,156	42.79%	\$456,802	47.64%
Non-food	\$52,681	5.64%	\$47,438	4.91%	\$56,505	5.89%
Total	\$992,510	106.3%	\$1,000,246	103.6%	\$1,055,682	110.1%
REVENUE						
Federal	\$891,959		\$918,517		\$927,084	
State	\$6,029		\$6,120		\$5,877	
Local	\$35,966		\$40,815		\$25,801	
Total	\$933,954		\$965,452		\$958,762	
Loss	(\$58,556)	6.3%	(\$34,794)	3.6%	(\$96,920)	10.1%

NOTE: Totals may not sum due to rounding.

SOURCE: School Review Team interview data with the Presidio ISD business manager.

According to financial statements, at the end of school year 2010–11, the CNP fund balance was \$209,103; by the end of school year 2011–12, the fund balance had declined to \$121,782. The business manager stated that during school year 2012–13, the fund balance was exhausted and the account was closed. The business manager develops the annual budget for the programs based on the prior year's expenditures with projected increases in costs, and projected revenue for the coming school year.

Figure 8–2 shows the dollar value and percentage of each of the sources of funding for school year 2012–13. At 96.7 percent of total revenues, federal funds made up the most significant source of funding for the Presidio ISD CNP, followed by local funds at 2.7 percent. State matching funds contributed 0.6 percent to the total.

Figure 8–3 shows the total food service revenue generated compared to food, labor, and non-food expenditures over a three-year period, from school year 2010–11 to 2012–13.

Revenues increased from school years 2010–11 to 2011–12 by \$31,498; however, revenues decreased for school year 2012–13 by \$6,690. According to the food service managers, program participation has dropped since the implementation of the new meal patterns. Food costs as a percentage of revenue increased by 0.95 percent between the school years 2010–11 and 2011–12. Food costs continued to rise by 0.67 percent the following year even though revenue declined.

The new meal pattern regulations are more expensive to meet than the meal patterns required in previous years. Labor costs as a percentage of revenue decreased by 2.89 percent between the school years 2010–11 and 2011–12. However, these costs increased by 4.85 percent the following year, even though revenue decreased. The business manager indicated that two employees were hired during this time period. Non-food costs as a percentage of revenue range from 4.91 percent to 5.89 percent, remaining stable. Loss declined between the school years 2010–11 and 2011–12, from \$58,556 (6.3 percent of revenue) to \$34,794 (3.6 percent of revenue). The following year there was a \$96,920 loss (10.1 percent of revenue). The CNP fund balance was exhausted, and the district supplemented the program by using \$62,640 from local funds.

Presidio ISD has not performed an analysis of the CNP to determine the percentage of revenue that should be budgeted for each of the three categories of expenditures (food, labor, and non-food). The cafeteria managers do not participate in the development of the budget for their department and are unaware of any budgetary restraints. They have not calculated the funds available per average meal served based on revenue generated by each of the three categories of federal funding—free, reduced-price, and paid—for breakfast and lunch. Standards have not been developed to calculate acceptable meals-per-labor-hour produced in the kitchens based on current services provided, and management does not base

decisions on resources available. The cafeteria managers are unaware of the ongoing financial status of the programs in each of their schools and would not become aware of any losses incurred by the programs until the end of the school year, when it is too late to take any corrective action on deficit spending.

Before the introduction of the new meal patterns, the district operated the CNP eight out of nine years with a surplus. Most CNP in districts across the nation find it difficult to generate a profit, as prices on goods and services continually rise, and in recent years, the USDA expectations for program improvement have increased. Over the last three school years, the Presidio ISD CNP has exhausted the \$209,103 fund balance, and the district has supplemented the programs with an additional \$62,640 from local funds. If Presidio ISD continues to spend in excess of revenue, the district will regularly have to supplement the programs from the general fund.

Best practices dictate that each school district performs an annual cost analysis of their CNP to project expenditures for the following year based on anticipated student participation in the CNP. The standards for expenditures are conventionally expressed and tracked for food, labor, and non-food as a percentage of revenue.

Traditional industry standards for the percentage of revenue identified for food, labor, and non-food costs are changing due to the initiation of new meal patterns. *Managing Child Nutrition Programs, Leadership for Excellence, Second Edition* states the following:

Food cost includes food purchased, donated commodities, and food production supplies. Food expenditures amount to approximately 40 percent to 50 percent of the school district's food service programs budget, which is the generally accepted guideline.

This percentage has increased in recent years and may increase again next year. Although the USDA has added \$0.06 reimbursement per meal for certified districts implementing the *Healthy, Hunger-Free Kids Act of 2010*, schools are reporting that the new requirements are adding an estimated \$0.25 or more per meal to food costs.

According to the National Food Service Management Institute's *Financial Management: A Course for School Nutrition Directors Instructor's Manual 2010*, "USDA mandates that in the management of school nutrition programs, the school food authority must maintain a high

level of accountability for all revenue received, how that revenue is dispersed, and to ensure revenue is sufficient to sustain a nutrition program that serves food high in quality and nutritional value."

Each district must develop its own acceptable percentages based on a variety of district-specific factors, including, but not limited to, the amount of purchased-prepared food versus cooked from scratch food used in the operations, the number of choices offered, and if the district is washing dishes or using disposables.

The district should develop district standards for Child Nutrition Programs (CNP) expenditures (food, labor, and non-food) as a percentage of revenue, reducing expenditures to levels that do not exceed revenue.

The first step in this process is to involve the cafeteria managers in the development of the CNP budget based on these standards. They should actively track profit and loss for the CNP by school throughout the year, starting with establishing a history by month. For example, food costs will be a high percentage of expenditures during the beginning of the school year as the district builds inventory. At the end of the school year, when inventory is being exhausted, the percentage of expenditures on food will reduce significantly. The end of the year totals will determine if the standards set were realistic and if the operations were successful; but by tracking this information routinely throughout the year, necessary changes in spending can be initiated as soon as a potential problem is identified. The district should use this information to make future management decisions. Using these standards, the district should track profit and loss for the CNP and routinely report current and accurate financial information to the cafeteria managers as a basis for management decisions.

This recommendation could be implemented with existing resources.

LABOR COST AND PRODUCTIVITY (REC. 37)

Presidio ISD has not developed a staffing formula based on productivity to determine the number of labor hours necessary to operate each of the district kitchens.

Since Presidio ISD does not have a staffing formula, the review team calculated the meals per labor hour shown in **Figure 8-4**. During the month of September 2013, 1,381 lunches and 896 breakfasts were served. Very little a la carte food is sold in the cafeterias, and the cafeterias do no catering.

**FIGURE 8–4
PRESIDIO ISD MEALS-PER-LABOR-HOUR CALCULATION
SEPTEMBER 2013**

MEAL TYPE	STUDENTS AND ADULTS SERVED	MEAL EQUIVALENTS	FACTORS	ME	LABOR HOURS	MPLH
Lunch	1,381	1=1	1	1,381		
Breakfast	896	3=2	0.66	591		
Snack	0	3=1	0.33	0		
A la carte	\$143	Dollar value	\$3.2425	44		
Total				2,016	197	10.23

NOTE: Totals may not sum due to rounding.

SOURCES: School Review Team interview data; Average Daily Participation (ADP) rates from the Daily Record of Meals Served, September 2013; Factors provided in the National Food Service Management Institute, 2010.

For the purposes of this analysis, an estimated value of \$143 per day for a la carte food (\$25,801 local funds for school year 2012–13 divided by 180 school days = \$143 per day) was used. Currently the district is not participating in the Afterschool Snack Program.

The elementary kitchen is currently staffed with 14 employees working a combined 109 hours daily; the middle and high schools each have five and one-half employees working a combined 44 hours daily; this totals 197 labor hours per day, districtwide, including the full-time manager of each school.

Meals-per-labor-hour (MPLH) is a productivity index that is measured by dividing the total meal equivalents (ME) for a given period by the total number of productive paid labor hours for the same period. Productive labor hours are the actual hours assigned to a kitchen and include all labor charged to and paid for by the CNP for work performed.

The common measure for productivity in school kitchens is MPLH, the meal being one reimbursable lunch. All other sources of revenue such as reimbursable breakfasts, snacks, a la carte, and catering sales are converted to the equivalent of one reimbursable lunch or an ME. Food service directors and school business managers use ME as the unit of measure of productivity for school food service programs when evaluating efficiency and formulating staffing patterns for the purpose of budgeting. MEs are determined from meal count categories and other sources of revenue using the following factors, rounded to the nearest whole number:

- lunch: 1 lunch = 1 ME
- breakfast: 3 breakfasts = 2 ME (factor – 0.67)

- snack: 3 snacks = 1 ME (factor – 0.33)
- non-reimbursable food sales (a la carte and catering) with the dollar amount divided by reimbursement for free meals (\$3.01 + USDA commodity value \$0.2325 = \$3.2425)

One of the important decisions any food services director must make is how to manage the cost effectiveness of the school meals program. Determining staffing needs is not always the result of the application of a simple formula. Many things may impact staffing in the CNP. Possible criteria used to assign labor include:

- number of meals or MEs served;
- number and type of services offered and the complexity of the menus (for example, in Presidio ISD each school sets up a soup and salad bar with very limited choices in addition to the serving line each day. A la carte service is minimal; the cafeterias do not cater. The elementary school transports breakfasts for grades pre-K–2 which takes some additional time.);
- amount of convenience foods used (cooking from scratch takes more labor hours than preparing convenience-type menu items); and
- skill level of employees.

Sample staffing guidelines based on MPLH are shown in **Figure 8–5**. It should be noted that these guidelines reflect a highly organized operation with a strong standardized management system in place. Presidio ISD is producing approximately 2,016 MEs per day divided by 197 labor hours or 10.23 MPLH, districtwide, which does not meet the expectations of **Figure 8–5**.

**FIGURE 8–5
SAMPLE STAFFING GUIDELINES**

MEAL EQUIVALENTS	LOW MPLH	HIGH MPLH
10–100	8	10
101–150	9	11
151–200	10	12
201–250	12	14
251–300	13	15
301–400	14	16
401–500	14	17
501–600	15	17
601–700	16	18
701–800	17	19
801–900	18	20
901 and higher	19	21

SOURCE: School Food Service Management for the 21st Century.

Due to economy of scale, as the number of ME increases, so does the number of MPLH produced; larger schools should produce more MPLH than smaller ones, i.e., the elementary school should produce a higher number of MPLH than the middle and high schools. The district has not determined the MPLH for each of the three district campuses. The superintendent stated that Region 18 provided the district with a staffing formula that they are required to implement, and that the district has strictly enforced. However, the Region 18 Child Nutrition (CN) specialist indicated to the review team that although they provide the district with staffing guides based on MPLH, Presidio ISD is not required to explicitly follow those guides.

There are two ways to increase the number of MPLH: 1) raise productivity by increasing student and adult meals

served and foods sold or 2) reduce labor hours. The cafeterias are currently serving lunch to 92 percent of the enrolled students. Although there is some room for growth, it is not significant. Since the new meal patterns have been implemented, the cafeteria managers indicated that student and adult participation has dropped.

At 61 percent, the breakfast participation is considerably less than that for lunch. Although breakfast served in the classroom increases the need for labor and can restrict the types of menu items offered, classroom breakfast generally increases participation. Some districts have an effective alternate method for serving breakfast by allowing a nutrition break sometime after the beginning of the school day when the students are in class. Students can be brought to the cafeteria by classroom to receive a breakfast. Some districts increase participation in the SBP and NSLP through marketing or merchandising. **Figure 8–6** shows the revenue gain from increased breakfast participation. If the district were to increase breakfast participation to the same level as lunch participation, 92 percent, the revenue would increase by \$760 per day, or \$136,800 annually (total reimbursement for 92 percent ADP is \$2,359.27 minus current ADP reimbursement \$1,599.19 = \$760 daily increase x 180 days = \$136,800 potential annual increase in reimbursement).

The increase in breakfast participation shown in **Figure 8–6** increases the Meal Equivalents (ME) by 298: 1,322 minus current ADP 871 = 451 increase x 0.66 breakfast factor from MPLH calculation = 298 ME increasing the daily ME to 2,314 (2016 + 298 = 2,314), increasing the MPLH to 11.75.

The district has not implemented the Afterschool Snack Program. The NSLP offers cash reimbursement to help schools serve snacks to children involved in afterschool activities with the goal of promoting the health and well-being of children and youth. A school must provide children

**FIGURE 8–6
PRESIDIO ISD
CURRENT BREAKFAST ADP AND REIMBURSEMENT VERSUS 92 PERCENT ADP AND REIMBURSEMENT**

	REIMBURSEMENT PER MEAL	CURRENT 61 PERCENT ADP		92 PERCENT ADP	
		ADP	TOTAL REIMBURSEMENT	ADP	TOTAL REIMBURSEMENT
Free	\$1.89	826	\$1,561.05	1178	\$2,226.33
Reduced Price	\$1.59	19	\$30.97	71	\$112.44
Paid	\$0.28	26	\$7.17	73	\$20.51
Total		871	\$1,599.19	1322	\$2,359.27

NOTE: Totals may not sum due to rounding.

SOURCE: September 2013 Reimbursement Claim and reimbursement values for school year 2013–14.

with regularly scheduled activities in an organized, structured and supervised environment, including educational or enrichment activities (e.g., mentoring, tutoring programs). All programs that meet the eligibility requirements can participate and receive USDA reimbursement for afterschool snacks.

Afterschool snacks must contain at least two different items of the following four: a serving of fluid milk, a serving of meat or meat alternate, a serving of vegetables or fruits, or full strength vegetable or fruit juice, a serving of whole grain or enriched bread or cereal. The reimbursement rates for the Afterschool Snack Program are paid, \$0.07; reduced-price, \$0.39; and free, \$0.78.

The Presidio ISD schools offer little to no a la carte service. There are prices assigned to extra servings of the meal items; however, the high school cafeteria manager indicated that she does not sell additional servings, but instead gives the foods left over as seconds. Other school districts commonly offer alternate drinks, second servings of menu items, and other allowable foods at a la carte prices to enhance the meal service provided by the school cafeterias for both adults and students. When selling a food item that is also included as a part of the reimbursable meal, the pricing must ensure that buying an a la carte “reimbursable meal” is priced higher than the purchase of a reimbursable meal. The cafeteria manager must also be able to account for the revenue and costs associated with a la carte sales. Surveying the retail prices charged throughout the community is a good starting point when developing an a la carte pricing formula.

The Food Services Department currently does not cater within or outside the district. School districts commonly use catering to school and other community affairs as a service to the community and an opportunity to increase the CNP revenue and staffing.

As shown in **Figure 8–3**, the percentage of revenue spent on labor during the school year 2012–13 was 47.64 percent and food was 56.57 percent, totaling 104.21 percent, not including non-food expenditures. The district is not operating the CNP at an appropriate financial level, and the program is not fiscally self-sustaining. Both food and labor costs have not been reduced. Like many districts, Presidio ISD depends heavily on frozen prepared entrees, so it is no longer necessary for employees to arrive as early as those who are cooking from scratch. Many districts have reduced the number of or eliminated full-time employees and instead staff kitchens with part-time employees who arrive at

staggered times and can be scheduled during heavy periods of food production and service. As increases or decreases in participation and other forms of productivity and revenue issues occur, effective districts adjust staff hours accordingly.

Best practices dictate that each district develops a staffing formula that works in their kitchen so that sufficient labor hours are available and used for productive work. Work is planned to eliminate rush periods and ease the flow of activity throughout the day. Labor hours are scheduled according to need, staggering hours that employees arrive and depart.

The district should develop and use a staffing formula based on meals-per-labor-hour and make adjustments in the number of labor hours as productivity and revenue fluctuates.

The percentage of revenue spent on labor should be reduced. Either the cafeterias should generate greater revenue or the district should reduce the number of labor hours assigned to district kitchens. Increased participation in the NSLP and SBP, sale of a la carte foods, and/or catering could add revenue. The district could also conduct a financial analysis of the profitability of adding the Afterschool Snack Program. The district should consult with the Region 18 CN specialist for clarification on the staffing guides that they provide.

The district could develop the staffing formula with existing resources. During the 2012–13 school year the labor cost was 47.64 percent of revenue. If the district reduced the cost of labor to 42 percent (by 5.64 percent) \$25,764 would be saved ($\$456,802$ spent on labor during the school year 2012–13 \times 0.0564 = \$25,764).

COLLECTION PROCEDURE FOR BREAKFASTS SERVED IN THE CLASSROOM (REC. 38)

Presidio ISD did not secure approval from the Texas Department of Agriculture (TDA) for an alternate Point-of-Service (POS) collection method used for counting and claiming breakfasts served in the classrooms in grades pre-K–2.

Required for all districts participating in the SBP, the POS collection procedure described in Presidio ISD’s current TDA *Policy Statement for Free and Reduced-Price Meals – Attachment B: Meal Count/Collection Procedure(s)* dated FY 2012–13 indicates that breakfasts for all schools are served in the cafeteria and that the count of meals served is taken at the POS. Breakfast is not served in the cafeteria to students in

grades pre-K–2; it is served in individual classrooms. These meals are counted by classroom teachers once all students are served.

The POS is the point in the food service operation where a determination can accurately be made that a reimbursable meal has been served to an eligible child. None of the counts taken in any of the pre-K–2 classrooms complied with the POS requirement. Three of the teachers interviewed indicated that they did not understand what a reimbursable breakfast must contain to be counted and claimed. As observed in some classrooms, the students selected the foods they intended to eat, and in others, a complete breakfast was given to each student by the teacher and the number of breakfasts served was counted at the end of the serving period, not at the POS.

Meals claimed using an inaccurate procedure for counting and claiming may be subject to reclaim based on the findings of a TDA administrative review. If the district does not submit a revised POS collection procedure for approval to TDA and does not implement the procedure successfully, the district may continue to claim unearned federal reimbursement. Failure to have an approved POS counting and claiming procedure in place is not consistent with federal regulations.

A best practice used in many school districts is to provide teacher training at the beginning of the school year on the breakfast-in-the-classroom collection procedures so that the counting and claiming procedure is performed in each classroom as it is recorded in the district’s *Policy Statement for Free and Reduced-Price Meals – Attachment B: Meal Count/Collection Procedure(s)* approved by TDA. Additional training materials might include possible student selections for each daily menu and whether or not each potential combination is reimbursable. Effective districts review instructional materials and provide additional training as necessary.

Figure 8–7 shows an example of an instructional tool used to communicate to the teacher the combinations of items the student may select that qualify as a reimbursable meal. This breakfast menu includes a breakfast sandwich, one-half cup of 100 percent fruit juice, orange wedges, and half a pint of milk. Because the breakfast sandwich contains multiple items, it can be paired with only one other item and still be considered a reimbursable meal. However, if a student’s breakfast consists of no breakfast sandwich and only two of the other items, it is no longer reimbursable.

FIGURE 8–7
PRESIDIO ISD EXAMPLE STUDENT BREAKFAST
SELECTIONS THAT QUALIFY AS A REIMBURSABLE MEAL

MENU	ITEM	STUDENT SELECTIONS					
		REIMBURSABLE SELECTION?	YES	YES	YES	NO	YES
Breakfast Sandwich	1 serving of grain and 1 serving of grain alternate	X	X	X			X
Juice	1/2 cup fruit	X					X
Orange Wedges	1/2 cup fruit		X			X	X
Milk	1 half-pint milk				X	X	X

SOURCE: School Review Team interview data.

School districts participating in the USDA CNP must ensure that the meals claimed for reimbursement are based on an accurate count of qualifying meals served. The collection method used for counting reimbursable meals must be taken at the POS, approved by TDA, included in the district’s policy statement, and implemented as written.

The district should develop and submit for approval to the Texas Department of Agriculture (TDA) a revised *Policy Statement for Free and Reduced-Price Meals – Attachment B: Meal Count/Collection Procedure(s)* for breakfast-in-the-classroom served at the elementary school, grades pre-K–2.

In order to implement this recommendation, the business manager/food services director should also develop sufficient training materials as references for both regular and substitute teachers to ensure staff has adequate information to perform the collection procedure accurately. The approved procedures should be established immediately, once approval is granted. The business manager/food services director should regularly visit classrooms during breakfast service to monitor implementation, taking care to regularly visit classrooms with substitute teachers.

This recommendation could be implemented with existing resources.

MEAL PATTERN REQUIREMENTS (REC. 39)

Presidio ISD claimed reimbursement for breakfasts that may not be consistent with meal pattern requirements as served.

During the course of the review, the review team observed breakfast being served at Presidio High School. One of the entrees was Breakfast Parfait, recipe number BCM-405–a.

The yogurt, fruit, and granola mixture was served in a six fluid ounce bowl. The recipe calls for a total of 10 fluid ounces per serving of drained fruit, yogurt, and granola, which does not fit into the six fluid ounce bowl that was used.

The school served 61 portions of the breakfast parfait on the day of the review; the ingredients were not measured and layered as directed by the recipe, but instead all combined and portioned into the six ounce bowls. On the September 2013 reimbursement claim, the high school average daily participation (ADP) was 204 breakfasts per day, so 61 out of 204 breakfasts (30 percent) did not meet requirements. This breakfast was served throughout the district. For the purpose of example, the district served an ADP of 871 breakfasts during September 2013. Thirty percent of 871 results in 261 breakfasts that were potentially non-reimbursable.

If, during the course of a TDA administrative review, incomplete meals are observed on the day of the review, those meals may be reclaimed. Depending on the longevity and severity of the violation, additional meals may be reclaimed.

Figure 8–8 demonstrates the dollar value of the potential over claim of breakfast reimbursement for 261 breakfasts or 30 percent of the Presidio ISD ADP.

If this menu item were served once per week, a potential reclaim could be \$17,230 (\$478.61 x 36 weeks = \$17,230). During the course of the review, all observed lunches met meal pattern requirements, but a review of the recipes used by the district suggests that there is potential that some lunches may not meet requirements.

Federal requirements dictate that the district ensure that meals served and claimed for reimbursement offer all of the items in sufficient quantities to meet meal pattern requirements. According to the TDA *Administrator’s Reference Manual*, “All districts must develop and follow standardized

recipes. Standardized recipes and preparation techniques must be used when planning and serving reimbursable meals. In order to qualify as a standardized recipe, a recipe must have an established and specified yield, portion size, and quantity. In addition, the ingredients must be constant in measurement and preparation.”

The district should ensure that each of the required items offered as part of a reimbursable meal contributes sufficient amounts to meet the requirements of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal patterns.

The district may prevent a possible reclaim of reimbursement due to a TDA Administrative Review by reviewing, refining, and standardizing all recipes used in the district prior to serving them as a reimbursable item of a meal.

The business manager/food services director or one or more of the cafeteria managers should:

- evaluate the contribution of each recipe used against the yield tables of the Food Buying Guide for Child Nutrition Programs;
- adjust each recipe to meet, not exceed, quantity requirements of the items of the meal patterns;
- adjust each recipe to accommodate district kitchen-specific conditions such as available equipment;
- test the recipe in each of the district kitchens to determine if it yields the expected number of a specific-sized portion as indicated; and
- evaluate the quality of the end product and adjust and retest as necessary.

This recommendation could be implemented with existing resources.

**FIGURE 8–8
PRESIDIO ISD
POTENTIAL DAILY OVER CLAIM IF 30 PERCENT OF THE BREAKFASTS SERVED DID NOT MEET FEDERAL REQUIREMENTS
SEPTEMBER 2013**

CATEGORY	ESTIMATED COUNT OF MEALS	FEDERAL REIMBURSEMENT PER MEAL	TOTAL REVENUE
Free	247	\$1.89	\$466.83
Reduced-Price	6	\$1.59	\$9.54
Paid	8	\$0.28	\$2.24
Total for the Day	261		\$478.61

SOURCE: Presidio ISD Reimbursement Claim, September 2013.

STANDARDIZED RECIPES, FOOD PRODUCTION RECORDS, AND PRODUCT DOCUMENTATION (REC. 40)

Presidio ISD does not maintain adequate documentation of the contribution of the foods served to the meal patterns.

Presidio ISD CNP staff consistently follow recipes; however, some of those recipes do not contribute to the meal patterns as planned. In particular, the middle school has not maintained complete and accurate food production records for school year 2013–14, and there are no centralized file CN labels and product analysis sheets to document the contributions of all purchased-prepared foods.

Standardized recipes ensure product quality, accurately predict the number of yield portions, and document the nutritional analysis of a portion of the product and the contributions of the menu item to the meal patterns. It is the responsibility of the school food authority (SFA) to use the yield tables of the *Food Buying Guide for Child Nutrition Programs* (FBG) to ensure that standardized recipes used in the CNP actually contribute to the meal patterns as planned and in accordance with district goals. Recipes must be written and adapted to the needs of the district (or a particular kitchen) based on cost, portion sizes, student preferences (seasonings), available equipment, and the production skills of employees. Once done, the recipe is tested in district kitchens for quality and yield, feedback from production staff is taken, and necessary adjustments are made. The superintendent and the cafeteria managers stated that the district is required to use the generic recipes provided by Region 18 and are not allowed to make any adjustments to these menus. However, the Region 18 CN specialist told the review team that although they provide menus to Presidio ISD, the district is not required to use them, and they can make any changes to the menus as long as the meals still comply with the new meal patterns.

A review of the recipe file used in the district identified the following:

- Some of the recipes did not meet minimum requirements; it is the responsibility of the district to ensure that sufficient food is used to offer required items in sufficient quantities to meet requirements.
 - Chicken Fajita Salad, recipe number CM-413: The recipe states that it yields 100 servings contributing 2 ounces of meat/meat alternate (M/MA) and 1/2 cup of vegetable. The recipe calls for 18 pounds of fajita meat = 288 ounces (18 x 16 = 288). The USDA Foods Fact Sheet for Schools

and Child Nutrition Institutions indicates that 1.8 ounces of chicken fajita strips provides 1 ounce-equivalent M/MA. $288 \div 1.8 = 160$ ounces M/MA or 80 2-ounce M/MA.

- Chicken Fajitas, recipe number CM-412 also calls for 18 pounds of fajita meat to serve 100 2-ounce M/MA.
- BBQ on a Bun, recipe number CM-404: According to the FBG one pound of Beef with BBQ Sauce provides 7 1-ounce M/MA, $26 \times 7 = 182$ 1-ounce M/MA divided by 2 = 91 2-ounce servings, which makes the recipe short 9 servings.
- Snowball Salad, recipe number CM-437: 2 #10 cans of Mandarin oranges, drained, provides approximately 29.5 1/2-cup servings, and 2 #10 cans of pineapple chunks, drained, provides approximately 32 1/2-cup servings; together they provided 61.5 1/2-cup servings of fruit, not 98.
- Many recipes exceeded minimum requirements. Recipes that exceed requirements should only be used as if the menu item is popular, and only then after careful examination of the cost. Examples include the following:
 - Chicken Parmesan recipe number CM-414: The recipe contributes a 2.5 ounce serving of M/MA when 2 ounces meet the daily minimum requirement.
 - Beefy Queso, recipe number CM-406: The recipe states a yield of 105 2-ounce M/MA servings and calls for 10 pounds of ground beef and 3 bags of cheese sauce; one half of that recipe yielding 52 2.25-M/MA servings calls for 5 pounds of ground beef and 3 bags of cheese sauce. Five pounds of beef provides $5 \times 11.8 = 59$ 1-ounce servings of M/MA, and three bags of cheese sauce provide 100 1-ounce M/MA. $59 + 100 = 159$ 1-ounce servings of M/MA divided by 52 servings = a 3.17 ounce serving of M/MA (not 2.25).
 - Baked Potato with Ham and Cheese, recipe number CM-403: 6.25 pounds of cheese provides 100 1-ounce M/MA; 10 pounds of ham, water added provides 13.1 1-ounce M/MA $\times 10 = 131$ 1-ounce M/MA; 231.1 1-ounce M/MA divided by 2 = 115 2-ounce M/MA, 15 2-ounce M/MA servings of ham in excess.

- Apple-Pineapple D'Lite. The recipe calls for 50 apples, according to the FBG 1/2 apple provides 1/2 cup of fruit; the recipe calls for an additional 1.67 #10 cans of pineapple rings, an unnecessary expense.
- Breakfast Club, recipe number BCM-404: Bacon contributes nothing to the meal patterns, so it is an unnecessary expense; the egg patty and ham and cheese contributions are also unnecessary. The 2 G contribution is sufficient to meet requirements.
- Some recipes do not contain sufficient information to determine contribution. Examples include the following:
 - Toasted Turkey Ham and Cheese Sandwich, recipe number CM-444: Additional information on the turkey ham is required to determine if this menu item meets requirements. There are two listings for turkey ham in the FBG. The commodity turkey ham requires 1.7 ounces to provide 1 ounce M/MA; there is another that requires 1.4 ounces. If the district used commodity ham, 1.5 ounces does not provide sufficient M/MA. The difference in the two is that one has 15 percent added ingredients; the recipe should specify which should be used.
 - Cheese Enchiladas, recipe number CM-410: Many commercially prepared enchiladas do not provide 1-ounce M/MA each. The recipe directs the production employee to follow manufacturer's recommendation for preparation; however, the recipe gives the purchaser no direction to document 1-ounce M/MA per enchilada.
- Some recipes do not yield a standardized number of servings. Calculating the amount of food to prepare is much simpler for food production employees when the standardized yields are 50 and 100. All USDA recipes follow that format so that the calculation, for example for 250 servings is 100 multiplied by 2.5, or for 75 servings, is multiplied by 0.75. When a recipe such as the one for Beef and Cheese Chalupas, CM-405 yielding 79 2-ounce M/MA is used, increasing and decreasing the recipe becomes much more complex.
- Some recipes did not note variations in portion sizes for different grade levels. When the portion sizes

for the recipe are different for K–8 and 9–12 grade levels, for example Beefy Queso, recipe number CM-406, the quantities should be accurately calculated and recorded for each preparation, and clearly identified (perhaps 9–12 on the front of the recipe card, and K–8 separately on the back of the card) to provide unmistakable directions for each of the two preparations.

In a well-developed food production system, standardized recipes and food production records are used together to plan, execute, serve, and document the meals served and claimed. The required information on a food production record includes:

- name of school;
- date of service;
- menu;
- portion size by grade level, adult, and a la carte for each menu item;
- number of planned servings by adult, a la carte, and student by grade level of each menu item;
- amount prepared in purchase units (e.g., pounds, #10 cans, gallons, quarts, cases) of contributing ingredients of each menu item;
- number of student, adult, and total meals served; and
- amount left over or short.

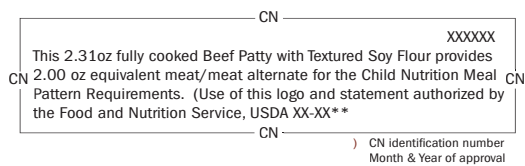
At the time of the review, the middle school did not have complete food production records for school year 2013–14. The manager indicated that he did not have sufficient time to complete this required record. The district has been using the Region 18 cycle menus and, as part of this management tool packet, partially completed food production records are provided to match the menus. The menu and portion sizes by grade level are pre-posted by Region 18 on the partially completed food production record. The information to be recorded by the manager includes the name of the school, date of service, number of planned servings by category, amount of food prepared in purchase units, the number of student, adult, and total meals served, and the amount left over.

CN labels and product analysis sheets document the contribution of purchased-prepared foods such as beef patties, pizza, and chicken nuggets. These are manufactured products that must have supporting documentation to

determine their contribution. A CN label statement clearly identifies the contribution of a product toward the meal pattern requirements, and it protects the SFA from exaggerated claims about a product. A CN label provides a USDA warranty against audit claims if the CN labeled product is used according to the manufacturer’s directions.

CN labeled products carry a distinctive label with a “CN” on each of the four sides, a six-digit number beginning with 0 in the upper right hand corner, and the wording “Use of this logo and statement authorized by the Food and Nutrition

**FIGURE 8–9
SAMPLE CN LOGO**



SOURCE: Food Buying Guide for Child Nutrition Programs, Appendix C, p. C-3.

Service, USDA XX-XX.” **Figure 8–9** shows a sample CN logo.

Some products do not carry a CN label, but they still may be credited using a product analysis sheet prepared, signed, and recently dated by an upper-level company official. This sheet must list the creditable M/MA products contained in the food item, including weights of each, and a certification statement as to what one portion of the product contributes to the meal pattern. Product analysis sheets are not warranted by USDA. A sample product analysis sheet may be found at www.squaremeals.org.

Each Presidio ISD cafeteria manager maintains a file of CN labels and product analysis sheets to serve as documentation of purchased-prepared foods. This practice is a duplication of effort and is less effective in ensuring that the documentation is available on every product for the purposes of review by TDA. A complete centralized file maintained by one person is one element of an integrated food management system. The person responsible for menu planning, recipe selection and standardization, food production record development and review, purchasing, and ensuring compliance maintains this file.

During a TDA review, the reviewer uses standardized recipes, completed food production records, and documentation of purchased-prepared foods to determine that meals claimed for reimbursement contain food items and items in sufficient amounts as required by program regulations. During a review, TDA may consider assessing reclaims if a school’s recipes contain insufficient amounts of ingredients contributing to the meal patterns. Food production records for previously served menus indicate meals were missing items and were possibly offered in insufficient portion sizes.

Based on the September 2013 reimbursement claim, the middle school claimed 5,769 lunches and 3,007 breakfasts in school year 2013-14. **Figure 8–10** shows the potential reimbursement reclaim if the uncompleted food production records were found during a TDA Administrative Review. Additional funds could be reclaimed depending on the longevity and severity of the violation.

The district should review, adjust, and standardize all district recipes to ensure that stated yields of portions and contribution are correct, and monitor food production records and the CN label or product analysis sheet files for

**FIGURE 8–10
PRESIDIO ISD
POTENTIAL MONTHLY RECLAIM FOR THE MIDDLE SCHOOL’S MISSING FOOD PRODUCTION RECORDS
SEPTEMBER 2013**

CATEGORY	LUNCH			BREAKFAST			POTENTIAL RECLAIM
	MEALS CLAIMED	REIMBURSEMENT PER MEAL	TOTAL REVENUE	MEALS CLAIMED	REIMBURSEMENT PER MEAL	TOTAL REVENUE	
Free	5,141	\$3.01	\$15,473.72	2,851	\$1.89	\$5,389.00	
Reduced-Price	309	\$2.61	\$805.47	67	\$1.59	\$106.90	
Paid	320	\$0.36	\$115.06	88	\$0.28	\$24.76	
Total	5,770		\$16,394.25	3,006		\$5,520.66	
						\$21,914.92	

SOURCE: Presidio ISD Reimbursement Claim, September 2013.

each of the schools to ensure that sufficient documentation is available to support the district reimbursement claims.

The district should consult with the Region 18 CN specialist for clarification on the use of the menus that they provide. The food service manager should then develop a standardized food production management system based on a well-constructed cycle menu tailored to the needs of the district. The system should include standardized recipes for all preparations, complete and accurate food production records documenting all meals claimed, and a centralized file of CN labels or product analysis sheets. These sheets document the contribution of each purchased-prepared menu item contributing to the NSLP and SBP meal patterns. Once the above listed items are in place, reimbursement funds are protected because adequate documentation is maintained and food production is centrally controlled and directed. Also, all district recipes should be reviewed, adjusted, and standardized to ensure that stated yields of portions and contribution are correct. Finally, all food production records and CN label or product analysis sheet files for each of the schools should be monitored to ensure that sufficient documentation is available to support the district reimbursement claims.

This recommendation could be implemented with existing resources.

FOOD COSTS (REC. 41)

Presidio ISD does not monitor and control food costs in the Child Nutrition Programs (CNP).

The district neither pre-costs menu items to support menu planning decisions nor post-costs menus to determine the actual cost of serving the meal. The review team observed that the district schools allow students to select multiple servings of foods including double servings of some foods. At the middle school, one student selected two pigs in the blanket, two cartons of orange juice and two milks, doubling the food cost for that meal. The high school cafeteria manager indicated that she does not serve leftover foods, but gives these extra servings to students in the last lunch period as seconds. Although the cost of the foods as the menu is planned is important, more critical is the cost of the food used as the menu is served.

Best practices dictate that the district analyze the average cost of menu items that meet particular item requirements and use the price of individual food items as one factor in determining how often a particular food can be served.

The following list provides an approximate average value for meal items:

- milk \$0.28 per half pint;
- fresh fruits and vegetables (half-cup) \$0.23;
- canned fruits and vegetables (half-cup) \$0.25;
- juice (4 fluid ounces) \$0.17;
- bread serving \$0.12 - \$0.15;
- breakfast entree \$0.40; and
- lunch entree \$0.60.

Many entrees include a grain (G) item as well as the meat/meat/alternate (M/MA). Grain cost varies greatly based on kitchen-prepared versus purchased-prepared products, the quality of product purchased, and the pricing a district is able to secure using purchasing cooperatives and commodity processing.

Pre- and post-costing menus each time they are served is a food management tool used for controlling food costs. Since most schools purchase using annual bids, it is only necessary to pre-cost cycle menus once and update those costs as prices change due to market conditions or when new menu items are introduced. Important insight can be gained by also post-costing the daily menus by school, determining the total cost of all foods used in production for the day as recorded on the food production record.

Pre-costing menu items prior to developing menus allows the planner to make decisions based in part on cost. For instance:

- The cost of individually packed diced peaches is \$0.48; if the sliced canned peaches are substituted, the cost is \$0.23 per 1/2-cup serving plus an estimated \$0.01 for the portion cup, a savings of \$0.24 per serving.
- The cost of individually packed apple slices is \$0.34; apples are priced weekly and generally cost no more than \$0.25 each; one half of an apple provides a 1/2-cup serving of fruit for approximately \$0.125. Cutting apples and portioning them saves \$0.215 per serving.
- Fish-shaped bread is not popular with most students and costs \$0.23 per serving. Soft wheat bread costs \$0.10 per slice x 2 = \$0.20. If the wheat bread were substituted, students may find the menu item more acceptable, and it would save \$0.03 per 2 servings of grain.

- Canned pudding costs approximately \$0.10 per serving and contributes nothing to the meal patterns. If this is served districtwide, it costs $\$0.10 \times 1,440 = \144 . The individually packed puddings cost \$0.31 each. If this were served district wide, the cost would be \$446.40.
- Crustless peanut butter and jelly sandwiches cost from \$0.552 to \$0.653 each depending on the variety selected. These may be too expensive to menu unless they are very popular with students and the cost can be balanced with other lower cost menu items.
- Both the edible bowl (\$0.35) and the tostada bowl (\$0.38) are expensive. If these two items are commonly discarded by students, the recipes using them should be adapted to provide the grain contribution from some other less expensive source such as tortilla chips. If one of these items is served districtwide, the cost is $1,440 \text{ ADP} \times \$0.38 = \$547.20 \times 2 \text{ times per six-week cycle} = \$1,094.40 \times 6 \text{ cycles per year} = \$6,566.40$.
- The cost of the recipe for Apple-Pineapple D'Lite, containing a pineapple ring in excess of what is needed for 1/2-cup adds \$0.10 per serving to the cost. This is a good menu choice only if the item is eaten and not discarded by students. All recipes exceeding minimum requirements should be examined—both for cost and the rate at which the menu item is discarded. If a pineapple ring is served to each child districtwide, it costs $\$0.10 \times 1,440 = \144.00 .
- Bacon is used three times over the six-week cycle of breakfast menus. Bacon contributes nothing to the meal pattern and costs \$0.16 per slice; the food production record identifies a portion as being 2 slices. During September 2013, the ADP for breakfast was 871. $871 \text{ servings} \times \$0.32 \text{ cost per serving} = \$278.72 \times 3 \text{ times menued over 6 weeks} = \$836.16 \text{ cost of bacon per cycle} \times 6 \text{ cycles per year} = \$5,016.96 \text{ annual cost of bacon}$.
- The price of frozen cut broccoli is \$0.019 less expensive when purchased in a 20 pound case over 12–2.5 pound packages.
- Bulk ranch dressing provides a slightly larger portion for \$0.015 less than packets; however, when served from dispensers, students often take the dressing in excess.

- Round pie pizza may be too expensive to serve; the price of 4 x 6 pizza varies depending on the cheese (100 percent cheese or 50percent /50 percent blend cheese/cheese substitute) and whether or not the crust is whole grain.
- There is a \$0.06 price difference between a one-ounce serving of shredded and sliced American cheese. School cafeterias should not use shredded when sliced will do.
- There is a \$0.23 price difference between diced chicken breast and diced white and dark chicken meat.
- There is a \$0.09 price difference between a pork, beef, and chicken frankfurter costing \$0.21 and a turkey frankfurter costing \$0.12.
- Quesadillas are \$0.77 each. These may be too expensive to serve unless they are very popular with students and they are eaten, not discarded.

The district should identify the target food cost for breakfast and for lunch based on the average per meal revenue available and the food cost as a percentage of revenue based on an evaluation of the affordability of each menu item prior to placing it on the menu.

Using the Presidio ISD September 2013 reimbursement claim, the average revenue per lunch served was \$2.84: ($\$77,222.30 \text{ reimbursement for free, reduced-price, and paid meals}$) + (meal pattern certified extra reimbursement of $\$0.06 \times 27,760 \text{ lunches} = \$1,665.60$) = $\$78,887.90$ divided by 27,760 lunches = \$2.84 per lunch served. The average revenue per breakfast served was \$1.84: $\$33,583 \text{ reimbursement for free, reduced-price, and paid meals}$ divided by 18,292 breakfasts = \$1.84 per breakfast served.

The food cost for the school year 2012–13 was 56.57 percent of revenue; applied to the revenue per lunch, \$2.84 equals \$1.61 food cost per lunch; revenue per breakfast \$1.84 equals \$1.04 food cost per breakfast. As observed during the review, approximately 50 percent of food served to students is discarded at breakfast and lunch. In an effort to make CNP fiscally self-sustaining, if the district could reduce the food cost to 50 percent of revenue, \$1.42 would be available to spend on food for lunch and \$0.98 for breakfast; \$64,829 would be saved annually. This savings is shown in **Figure 8–11**. The district supplemented the programs during the school year 2012–13 by \$62,640 from local funds.

**FIGURE 8–11
PRESIDIO ISD
SAVINGS DUE TO THE REDUCTION IN FOOD COST FROM 56.57 PERCENT TO 50 PERCENT
SEPTEMBER 2013**

MEAL REIMBURSEMENT	MEALS	REVENUE PER MEAL	FOOD COST PER MEAL AT 56.57 PERCENT	FOOD COST PER MEAL AT 50 PERCENT	DIFFERENCE IN FOOD COST PER MEAL	SAVINGS PER MONTH	MONTHLY SAVINGS MULTIPLIED BY NINE MONTHS
LUNCH							
\$78,887.90	27,760	\$2.84	\$1.61	\$1.42	\$0.18	\$4,996.80	
BREAKFAST							
\$33,583.00	18,292	\$1.84	\$1.04	\$0.92	\$0.12	\$2,206.40	
Total Savings						\$7,203.20	\$64,828

SOURCE: Presidio ISD Reimbursement Claim, September 2013.

The district could implement this recommendation using a variety of strategies to reduce food costs:

- Establish an average target food cost for breakfast and for lunch. Plan the cycle menus with program requirements, student acceptability, and food cost as the three equally important factors used to determine how often a menu item is served.
- Post-cost each school’s menu as served to determine where non-planned expenses may be occurring, and can be eliminated or reduced.
- Evaluate the cost versus benefits of the soup and salad bar as currently presented. The required labor to set up and tear down a food bar is significant. Underutilized food bars are a source of unnecessary wasted food and labor. The popular vegetable soup could continue to be offered as a vegetable choice from the serving line.
- Evaluate practices such as allowing students to select two servings of the same food at no cost. Implement a la carte pricing and sell second servings as well as other allowable foods, ensuring that prices charged generate a profit. A good rule of thumb might be to structure pricing so that the food cost is no more than 40-45 percent of the cost of the item.
- Adjust cycle menus to make the best possible use of USDA Foods, finding creative ways to integrate them into the menus to eliminate the need to purchase commercial food products while commodity foods are underutilized.

- Identify additional brands of foods available on the West Texas Food Service Cooperative bid that are less expensive than the brands Presidio ISD is currently using and order a case of each and taste test them with students to determine student acceptability.
- Evaluate the cost of individually wrapped products such as apple slices, baby carrots, and frozen diced peaches against the cost of buying in bulk and portioning them in the kitchen.

This recommendation could be implemented with existing resources. If food costs can be successfully reduced to 50 percent of revenue, the district would save \$64,828 annually.

COMMODITY PROCESSING VERSUS BROWN BOX USDA FOODS (REC. 42)

Presidio ISD does not perform a cost analysis of the value of commodity processing versus receiving brown box United States Department of Agriculture (USDA) Foods to determine which is most financially beneficial to the Child Nutrition Programs (CNP).

Presidio ISD has never processed USDA Foods into purchased-prepared menu items, but instead uses brown box foods (commodities as offered by the USDA without further processing). Each district has a different set of circumstances that determines which of these two practices is most financially beneficial. Presidio ISD has sufficient labor to process raw foods such as bulk ground beef; however, a cost analysis of the two practices has not been performed.

The district receives a commodity delivery once every three months. The district contracts with Dees Food Service in El

Paso for warehouse storage of the commodities. The contract provides for free warehouse storage for 45 days of the three months, and a storage fee for each case of food for the additional 45 days, as well as a per-case delivery fee. When foods are banked with manufacturers, the district receives delivery as needed through the distributor, paying no additional storage; however, the value of the committed foods and processing fees may be greater than the storage and delivery fees on the brown box commodities.

The federal Agricultural Marketing Service's (AMS) commodity procurement staff purchases a variety of food products in support of the NSLP and other food assistance programs. These purchases also help to stabilize prices in agricultural commodity markets by balancing supply and demand. Markets fluctuate and conditions such as a drought may cause AMS to purchase less or none of particular items due to shortages in supplies or higher than expected prices. In districts that order commodities the school year prior to when they will be distributed, changes in USDA purchasing plans may leave schools with unspent entitlement dollars. According to the West Texas Food Service Cooperative coordinator, Presidio ISD now has \$6,174 remaining entitlement due to foods that were not delivered to Texas as planned. It is unknown if there will be any additional USDA Foods made available to use this remaining entitlement.

Figure 8–12 shows that Presidio ISD has not used entitlements totaling \$50,990 over the past four school years, an average of \$12,748 per year. No one in the district could explain why the entitlement was unused.

The original entitlement for school year 2013–14 was \$68,452; \$43,968 has been allocated to date; \$18,310 remains in unfilled requests, and \$6,174 is the remaining entitlement. It is unknown as to whether or not the district will have the opportunity to use the remaining entitlement this school year. Planning for the use of USDA Foods Planned Assistance Level (PAL) within a cycle menu for the

following school year is complex. Districts commonly analyze the most efficient use of USDA Foods to save the district thousands of dollars annually.

Best practices dictate that the district identify an employee (typically the food services director) to plan for the full use of the annual USDA Foods entitlement. This planning requires a thorough understanding of the program, including commodity processing, the needs and priorities of the district, the costs of various options, and how to resolve commodity-related problems such as an excess inventory of a particular food (e.g. the vegetable oil in the middle school kitchen). Region 18 offers annual training on these topics in both Lubbock and in Alpine.

The district should designate a district employee to manage all United States Department of Agriculture (USDA) Foods-related activities including researching and performing a detailed cost analysis of the options available for making full financial use of the annual commodity foods entitlement.

To implement this recommendation, the district should request that the West Texas Food Service Cooperative coordinator provide support in completing an analysis of the value of commodity processing versus receiving brown box USDA Foods. This analysis should identify all costs including the storage and delivery of brown box products versus the value of the potentially banked commodity foods and any processing fees linked to commodity processing. The district should access the automated system containing information about the district's PAL and the choices the district made. Finally, the district should track usage and maintain a file of program participation.

This recommendation could be implemented with existing resources.

OFFER VERSUS SERVE (REC. 43)

Presidio ISD has not effectively implemented the Offer versus Serve (OVS) provision of the School Breakfast

FIGURE 8–12
PRESIDIO ISD USDA FOODS ENTITLEMENT AND USAGE
SCHOOL YEARS 2009–10 TO 2012–13

SCHOOL YEARS	2009–10	2010–11	2011–12	2012–13
Entitlement	\$45,475.57	\$61,227.41	\$60,213.10	\$58,968.84
Entitlement Used	\$37,961.51	\$34,800.30	\$43,274.15	\$58,858.79
Entitlement Unused	\$7,514.06	\$26,427.11	\$16,938.95	\$110.05

SOURCE: Texas Department of Agriculture.

Program (SBP) and National School Lunch Program (NSLP) in all district schools at all age/grade levels.

OVS allows students to decline some of the food offered in a reimbursable breakfast or lunch. The goals of OVS are to reduce food waste and to permit students to choose only the foods they want to eat. Presidio ISD allows students in all grade levels to refuse foods; however, students appear to be selecting and discarding foods rather than taking only those foods they intend to eat.

Foods discarded by students do not contribute to their nutritional well-being and cost the district a substantial amount of money to purchase, prepare, and serve. Because students may choose fewer selections under OVS, USDA guidance is provided on what constitutes a reimbursable lunch and breakfast. A reimbursable lunch as offered is composed of five items: meat/meat alternate, vegetable, fruit, grain, and milk, and the meal must contain three of the five offered items. One of the choices selected must be at least a half-cup serving of the fruit or vegetable item or a half-cup total serving of both fruit and vegetable. A reimbursable breakfast is composed of four items: grain (one or two servings), meat/meat alternate (referred to as grain alternate) is optional once the minimum daily grain requirement is fulfilled, 1/2 cup of fruit (which increases to 1 cup in 2015), and milk. A student may refuse one of the breakfast items (except 1/2 cup of fruit) and still have selected a reimbursable meal. The student must make the selection; it cannot be made for them. Although the district has established OVS at all grade levels in all schools throughout the district, it has not been implemented effectively.

Best practices dictate that in an effort to reduce food waste, schools should provide students with acceptable menu items that they enjoy, but encourage all students to refuse foods they do not intend to eat by effectively implementing OVS.

The 1970s saw a public outcry regarding the amount of food that was being wasted in schools operating the NSLP, which at that time the meal and all of its items were not offered but were served to every student. Now known as the OVS provision of the NSLP, Congress enacted 89 STAT. 512 PUBLIC LAW 94-105—OCT. 7, 1975:

(a) Subsection (a) is amended by adding at the end thereof the following new sentences: “The Secretary

shall establish, in cooperation with State educational agencies, administrative procedures, which shall include local educational agencies and student participation, designed to diminish waste of foods which are served by schools participating in the school lunch program under this Act without endangering the nutritional integrity of the lunches served by such schools. Students in senior high schools which participate in the school lunch program under this Act shall not be required to accept offered foods which they do not intend to consume, and any such failure to accept offered foods shall not affect the full charge to the student for a lunch meeting the requirements of this subsection or the amount of payments made under this Act to any such school for such a lunch.”

Since 1975, although OVS is still only required at the high school level at lunch, the option for use of this provision has been extended to breakfast and to students in all grade levels at breakfast and lunch as deemed appropriate by the district.

The district should implement the Offer versus Serve (OVS) provision effectively for breakfast and lunch in all grade levels in all district schools.

To more effectively implement OVS, all employees who are responsible for distributing and counting reimbursable meals should be trained to recognize a reimbursable meal under the requirements of OVS. Students should be allowed to select the minimum required items without being encouraged or required to select more than they want. The unit-priced meal should allow students to select from choices within each item but not in excess of what is required by the meal. Service of foods on the line should make it convenient to refuse foods, individually plating menu items that are less likely to be consumed, rather than placing them on the tray.

The district should also use strategies to encourage students to select only what they intend to eat. Such strategies include:

- speaking at staff meetings and parent teacher organizations to inform adult community members on the requirements and benefits of OVS;
- enlisting the help of teachers and parents in communicating with students as to what is required to be selected and encouraging students not to waste food;
- positioning the manager on the serving line during meal service to remind students that they may refuse foods they don't intend to eat (with the exception

of one 1/2 cup serving of fruit and/or vegetable for lunch);

- standing beside the garbage can when trays are returned and in a friendly manner discussing what is being discarded with students, and again reminding them that they do not have to take anything that they don't intend to eat (with the exception of one serving of fruit and/or vegetable for lunch); and
- promoting a zero waste campaign districtwide, setting goals by school or grade levels, tracking progress, and reporting to the student body, which could also include a celebratory lunch of student favorites or another reward when goals are achieved.

This recommendation could be implemented with existing resources.

PLATE WASTE (REC. 44)

Presidio ISD does not monitor plate waste and adjust menus accordingly.

There is tray waste at breakfast and lunch in all Presidio ISD schools. Members of the review team and the cafeteria manager of each school observed the food discarded by students returning their trays. It was estimated and agreed upon among the reviewers and the managers that a conservative estimate was 75 percent of what was selected by students was discarded at the elementary and middle schools; it was lower, approximately 50 percent, at the high school.

The superintendent indicated that he is aware of the amount of food being thrown away each day since the new USDA meal patterns were implemented. He also has concerns about the effects of the Region 18 cycle menus currently in use not meeting the needs of the student body and contributing to the waste. He specifically requested input on reducing waste.

Plate waste is not unique to Presidio ISD; it is due, at least in part, to the new meal pattern requirements. The portion sizes of fruit, vegetable, and grains have increased. According to regulations, students are required to select a fruit or vegetable portion for lunch even though they do not intend to eat it in order for the meal to be claimed for reimbursement. By the 2014-15 school year, all foods contributing to the grain item must be whole grain rich. Some of these products, such as whole wheat tortillas, are not readily accepted by students. All of these factors contribute to plate waste; however, there

are actions that effective districts take to reduce the amount of food discarded by students.

MENU VARIETY

In any school food service operation, the menu drives kitchen activities, determines compliance with program meal pattern requirements, and most importantly, influences whether or not students and adults elect to participate in the CNP. The acceptability of the menus ultimately determines if meals are contributing to the health of the students, in line with the CNP goals of providing nutritious meals to all students. Discarded food provides no nutritional benefits. Observations regarding Presidio ISD breakfast menus are offered with the goal of reducing waste:

- Breakfast pizza (served once in six weeks of menus) is extremely popular and economical at \$0.30 per portion. The district should review participation records for the days that breakfast pizza is served to determine if it should be placed on the menu more often, replacing an entree that is currently discarded by students.
- Toast is served once in 30 days. Toast is an inexpensive source of grain at \$0.10 per slice; Texas toast is \$0.173 per slice. Peanut butter, cinnamon, and cheese toast are all popular with most students.
- French toast, pancakes, and waffles are similar in that each of them is traditionally served with maple syrup. These items were on the menu eight of 30 days, which may be too frequently. If students are discarding these menu items, menus should be adjusted.
- Ready-to-eat cereal is an option that is popular with many students and is available as a daily choice on the cycle menu with Texas toast. This menu item makes an easy, economical choice against less popular entrees, and there is no waste; what is leftover can be easily stored and used the following day. If students are discarding the Texas toast, the district can reduce waste and save \$0.073 per serving by substituting regular toast.
- Grain Alternate (GA) or Meat/Meat Alternate (M/MA) is served in the forms of sausage, egg, cheese, ham, and chicken 24 of 30 days; bacon is served an additional three days, but it does not contribute to the GA item. As waste surveys are conducted, note the meats that are discarded by students, as these can be eliminated by ensuring there are at least two

servings of G on those menus, reducing waste and cost.

Observations regarding Presidio ISD lunch menus include the following:

- Similar items such as chalupa and quesadilla; chicken fajita and turkey wrap; chicken spaghetti and popcorn chicken; hamburger, cheese burger, and chicken patty on bun; chicken parmesan and cheese pizza; and steak fingers and chicken nuggets were served against one another as a choice. Determine the choice between two different kinds of M/MA (i.e. chicken or beef); different methods of preparation (i.e. breaded or un-breaded baked); different flavor profiles (i.e. home style or Italian); and forms (i.e. sandwich or cutlet with gravy).
- Although it may be appropriate due to student preference, Mexican foods are served 14 times during the 30-day menu cycle. All of these items are tortilla based. The district is using whole grain tortillas which are not yet acceptable to many students.
- Whipped potatoes are popular with most students yet they are not represented anywhere on the cycle menu.
- Garden salad may be overused, being served 13 of the 30 days of the cycle menu. Menus are more interesting if the salads are varied, using a variety of green mixes, garnishes, and dressings. Sliced apples, strawberries, pears, orange sections, toasted nuts, raisins, dried berries, cherries, or cranberries can be added to lettuce mixes to make them more interesting.
- Fresh fruit is offered three times within one week and not at all another week.
- Lettuce and tomato salad is only represented once in six weeks; this salad is a welcome accompaniment to sandwiches.
- Baby carrots are offered on eight of 30 menus; at \$0.23 per serving, these individual packs are more costly than most vegetable servings. Adjust the frequency of service of this item based on the number of uneaten servings discarded by students.
- Tangerine chicken, stuffed baked potatoes, Southwest and chicken broccoli penne casseroles, Salisbury steak, breaded pork chop, turkey and cheese wrap, BBQ rib sandwich, and fish shaped bread were menu items that students most often mentioned when asked

which menu items they would like to see removed from the menu.

PORTION SIZES

The portion sizes and contributions of some of the district recipes far exceed minimum requirements. The purpose of developing the recipes in this manner may have been to increase caloric value; however, if the menu item is discarded by students, it needs to be adjusted or replaced. **Figure 8–13** shows the cost of food for one menu item that exceeds requirements and therefore has an increased cost for waste.

**FIGURE 8–13
PRESIDIO ISD FOOD COST OF BREAKFAST CLUB RECIPE
SCHOOL YEAR 2013–14**

INGREDIENT	QUANTITY	COST
Pancakes, ready-to-eat	100	\$0.14
Eggs, Patties	50	\$0.14
Bacon, pre-cooked	50 slices	\$0.17
Cheese, American	RF slices 25 (.5 ounce slices)	\$0.07
Turkey Ham	50 slices (.5 ounce slices)	\$0.10
Total Cost		\$0.62

NOTE: Totals may not sum due to rounding.
SOURCES: PISD Breakfast Club Recipe; West Texas Food Service Cooperative Pricing.

The cost of serving the Breakfast Club to 871 students (breakfast ADP, September 2013) is \$540 (871 x \$0.62 = \$540). If the students were served only the pancakes, which meet the minimum requirement for two servings of grain, the cost would be \$122 (871 x \$0.14 = \$122), saving \$418 (\$540 - \$122 = \$418). This item is menued twice in six weeks. \$418 x 2 = \$836 savings x 6 cycles = \$5,016 savings annually.

STUDENT PARTICIPATION

The district does not conduct product taste testing with students. Allowing students to taste products prior to service provides an opportunity for feedback for the cafeteria as well as giving the students a feeling of ownership in the food programs.

When considering adding a new product to the menu, the district could purchase one case prior to menuing the item and taste test it with students at all grade levels. When taste testing products, the tester should not try to get student participants to rate products against one another in that

identifying one product as being “the best” limits competition and is too restrictive to the purchaser. Instead the tester should determine if the product is acceptable to students and if they like the product. The high school formed an advisory committee, but they have never met.

During the course of the review, the percentage of food discarded by students at all schools was 50–75 percent or more. A conservative estimate would be that 50 percent of the food selected at breakfast and lunch in district schools is discarded by students. This percentage is used as the example, although it must be noted that a plate waste survey where a district employee stands near the garbage cans and tallies the servings of discarded untouched foods would provide a more accurate picture of the acceptability of any given menu item, and the funds lost.

Figure 8–14 shows that the district currently generates an average of \$1,598.63 in reimbursable breakfast sales and \$3,877.02 in reimbursable lunch sales, for daily total of \$5,475.65 reimbursement.

Food cost for school year 2012–13 was 56.57 percent of revenue. Using 56.57 percent food cost the current annual cost of tray waste is \$278,781.77 (\$5,475.65 total current reimbursement per day x 56.57 percent food cost = \$3,097.58 estimated daily food cost x 50% waste = \$1,548.79 estimated daily value of discarded food x 180 days \$278,781.77 estimated annual cost of tray waste.)

Best practices dictate that the district closely monitor plate waste and survey student likes and dislikes to identify the reasons they are discarding particular food items, then work to find ways to remedy the problem foods. More than ever before, schools must be diligent in replacing discarded foods with foods that have more student appeal and ensuring that requirements are met but not exceeded. Foods that are

prepared according to the recipe, held and served at the proper temperature, and displayed attractively on the serving line are more likely to be consumed. Activities that may reduce plate waste include:

- adding variety to menus, temporarily removing unpopular menu items, and rotating menu items in and out to alleviate boredom;
- attending food shows with students to get new ideas for menu offerings, and including some new menu items on the cycle menu monthly;
- providing foods in the most acceptable form, such as orange wedges instead of whole fruit, to eliminate the need to peel it within a short lunch period;
- effectively implementing Offer versus Serve (OVS) in all schools at all grade levels for breakfast and lunch and encouraging students to select a reimbursable meal of foods they intend to eat
- encouraging teachers to address the school cafeteria choices as healthy options whenever the curriculum allows; and
- allowing students to participate in taste testing to establish acceptable brands of products.

The district should monitor and reduce plate waste.

Plate waste could be monitored and reduced by taking the following steps:

- survey student likes and dislikes and monitor student discards for several days at each of the schools for both breakfast and lunch;
- talk to the students informally in the cafeterias to collect input on menu items they would like removed

FIGURE 8–14
PRESIDIO ISD DAILY REVENUE
SEPTEMBER 2013

CATEGORY	BREAKFAST			LUNCH		
	ADP	REVENUE PER MEAL	TOTAL REVENUE	ADP	REVENUE PER MEAL	TOTAL REVENUE
Free	826	\$1.89	\$1,561.14	1178	\$3.01	\$3,545.78
Reduced-Price	19	\$1.59	\$30.21	71	\$3.01	\$213.71
Paid	26	\$0.28	\$7.28	73	\$1.61	\$117.53
Total Revenue	871		\$1,598.63	1322		\$3,877.02

NOTE: Totals may not sum due to rounding.
SOURCE: Daily Record of Meals Served and Claimed, September, 2013.

from, and added to, the menus, listening to what they say and taking notes;

- contact other local school districts and request names of products and recipes that are particularly favored in their districts;
- review the cooperative bid looking for affordable menu items that may be added to menus and secure a case of the product to taste test with students;
- construct a cycle breakfast menu (possibly one or two weeks) and a cycle lunch menu, integrating some of the ideas that came from the research;
- provide employees, administrators, teachers, parents, and most importantly students a forum in which to critique the menus; secure a recipe for every

preparation and standardize each to the needs of the district;

- prepare the cycle for the first time keeping complete food production records to document successes and failures;
- observe the plate waste daily throughout the process, take notes, and adjust the cycle accordingly; and
- taste test new foods with students prior to adding them to the menu, purchase one case and allow students at all grade levels to participate.

This recommendation could be implemented with existing resources. A conservative projected annual value of foods students are discarding was calculated as \$278,782. The district could save \$139,391 by reducing waste by 50 percent.

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	2014–15	2015–16	2016–17	2017–18	2018–19	TOTAL	ONE TIME
						5-YEAR (COSTS) OR SAVINGS	(COSTS) OR SAVINGS
CHAPTER 8: CHILD NUTRITION SERVICES							
35. Create an administrative position, food services director, reporting to the business manager.	(\$41,226)	(\$41,226)	(\$41,226)	(\$41,226)	(\$41,226)	(\$206,130)	\$0
36. Develop district standards for Child Nutrition Programs (CNP) expenditures (food, labor, and non-food) as a percentage of revenue, reducing expenditures to levels that do not exceed revenue.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
37. Develop and use a staffing formula based on meals-per-labor-hour and make adjustments in the number of labor hours as productivity and revenue fluctuates.	\$25,764	\$25,764	\$25,764	\$25,764	\$25,764	\$128,820	\$0
38. Develop and submit for approval to the Texas Department of Agriculture (TDA) a revised Policy Statement for Free and Reduced-Price Meals – Attachment B: Meal Count/Collection Procedure(s) for breakfast-in-the-classroom served at the elementary school, grades pre-K–2.	\$0	\$0	\$0	\$0	\$0	\$0	\$0

RECOMMENDATION	2014--15	2015-16	2016-17	2017-18	2018-19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 8: CHILD NUTRITION SERVICES							
39. Ensure that each of the required items offered as part of a reimbursable meal contributes sufficient amounts to meet the requirements of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal patterns.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
40. Review, adjust, and standardize all district recipes to ensure that stated yields of portions and contribution are correct, and monitor food production records and the Child Nutrition (CN) label or product analysis sheet files for each of the schools to ensure that sufficient documentation is available to support the district reimbursement claims.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
41. Identify the target food cost for breakfast and for lunch based on the average per meal revenue available and the food cost as a percentage of revenue based on an evaluation of the affordability of each menu item prior to placing it on the menu.	\$64,828	\$64,828	\$64,828	\$64,828	\$64,828	\$324,140	\$0
42. Designate a district employee to manage all United States Department of Agriculture (USDA) Foods-related activities including researching and performing a detailed cost analysis of the options available for making full financial use of the annual commodity foods entitlement.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
43. Implement the Offer versus Serve (OVS) provision effectively for breakfast and lunch in all grade levels in all district schools.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
44. Monitor and reduce plate waste.	\$139,391	\$139,391	\$139,391	\$139,391	\$139,391	\$696,955	\$0
TOTAL	\$188,757	\$188,757	\$188,757	\$188,757	\$188,757	\$943,785	\$0

CHAPTER 9

TRANSPORTATION

PRESIDIO INDEPENDENT SCHOOL DISTRICT

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 departments. Using a contracted management model, districts rely on the company to provide supervision of its transportation department. 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 operates its transportation department 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), which is determined by a formula that includes the number and type of students transported.

Presidio Independent School District (ISD) is located in Presidio, Texas, which had 4,426 residents according to the 2010 census. The district serves a mostly rural area of approximately 808 square miles. All K–12 students are transported within a single-tier routing scheme (all grades transported together on the same bus) to the district's three schools. The district's bell times are spread out during a 30-minute period and scheduled to accommodate the single-tier routing scheme. Presidio ISD also transports a remote geographical portion of Marfa ISD's students to Presidio ISD schools, as these students reside closer to Presidio. Marfa ISD pays tuition to Presidio ISD for these students. The Transportation Department operates six regular education buses, one special education bus, and one sport utility vehicle to daily transport a total of 426 students.

In addition to the daily school service, the Transportation Department coordinates and provides transportation for extracurricular activity and athletic trips during the school year and summer programs. Presidio ISD has a separate fleet of activity buses that supply transportation for these trips due to the distances traveled. Activity buses are of school bus design, but they are not school bus yellow in color and do not have the eight-light warning system used to stop other vehicular traffic on normal school bus routes. These buses cannot be used on daily school routes. A majority of the destinations are as far away as El Paso and Odessa/Midland, which are at least 230 miles away. The activity buses are operated by coaching and teaching staff. The drivers of activity buses are not required to have a school bus endorsement, but are required to possess a Class B commercial driver's license due to the Gross Vehicle Weight Rating (GVWR) of the vehicles.

The Transportation Department is also responsible for maintaining the district's fleet of vehicles other than school buses. These vehicles include six activity buses as described above, seven sport utility vehicles that may be operated for athletic and co-curricular field trips when participant capacities are low (so as not to have to operate a large school bus), and three pickups for facilities staff use.

The department is self-managed and has a director, eight bus drivers, one bus aide who provides assistance to students with special needs, two full-time mechanics, and one full-time clerk.

Three roads enter the town of Presidio. The routing schedule deploys one regular education bus on each road to pick up all students. One bus travels northwest directly to Candelaria, Texas; one bus travels directly north to Shaftner, Texas; and one bus travels southeast to Redford, Texas. The remaining three regular education buses transport students in town, where the densest population of students reside. The bus for students with special needs also travels north to Shaftner, Texas, as well as serving students within the town limits. Also, a sport utility vehicle transports three students from Lely Ranch each day.

The town of Presidio is one of 30 border crossings in the state of Texas. Due to its location, the district's transportation function faces ongoing challenges associated with local and

federal law enforcement agency activities related to drug smuggling and illegal immigration. For example, district activity buses have been re-directed to specific safe points, such as the Presidio Lely International Airport, for law enforcement checks. At safe points, passengers are evacuated from the bus while it is searched by law enforcement officials, sometimes with canine units, to ensure illegal drugs have not been placed on the bus for transport further into the country.

The district’s bus facility is centrally located adjacent to the district office. All school and activity buses are parked in a carport-protected, fenced-in concrete lot. Minor bus maintenance is performed by Transportation Department staff, while more extensive repairs are outsourced to local repair facilities or repair facilities located in El Paso or Odessa/Midland. Thus, major repairs require extensive amounts of time, mileage, and expense, particularly if a tow truck is involved. District mechanics typically perform light repairs, preventive maintenance, tire changes, oil and filter service, and vehicle pre-inspection repairs. The mechanics also maintain the cleanliness of the buses. In addition, mechanics provide the same level of service for the district administrative and facilities vehicles.

Based on the TEA School Transportation Route Services and Operation Reports for school year 2011–12, the district reported a total fleet of 20 buses and 10 school purpose vehicles. The TEA reports cited a total annual mileage of 83,538 (73,638 miles for the regular program and 9,900 miles for the special program), a transportation allotment of \$82,121 (\$71,429 for the regular program and \$10,692 for the special program) and total transportation operating costs of \$443,267 (\$406,007 for the regular program and \$37,260 for the special program). The allotment funds 19 percent of the prior year’s transportation costs.

The additional buses in PISD’s fleet are attributed to the need for vehicles to transport students to athletic and co-curricular trips because regular route buses and route drivers are not available for these trips. District staff members also use the school vehicles to attend district-supported staff meetings and conferences outside of town. Some of the vehicles owned by the district were donated by government agencies after the vehicles were seized in drug-related criminal cases. Maintenance costs for the number of extra vehicles are offset by the district not having to purchase those vehicles.

The key measures of cost effectiveness for a student transportation system include the annual cost per transported student and the annual cost per active route bus. It is also

useful to convert the annual cost per bus to a daily cost. This metric allows for the comparison of district costs to the typical industry standard for the pricing of contracted services. **Figure 9–1** shows key measures of cost effectiveness for Presidio ISD.

**FIGURE 9–1
PRESIDIO ISD MEASURES OF COST EFFECTIVENESS FOR
TRANSPORTATION
SCHOOL YEAR 2011–12**

MEASURE	METRIC
Annual Cost per Student	\$1,041
Annual Cost per Active Route Bus	\$55,408
Daily Cost per Active Route Bus	\$308
Buses per 100 Students Transported (Total Fleet of 20 Buses)	4.7
Buses per 100 Students Transported (8 Active Route Buses)	1.9

NOTE: An active route bus is defined as any vehicle that transports students to and from school on a daily basis.
SOURCES: Texas Education Agency School Transportation Operation and School Transportation Route Services Reports for school year 2011–12; School Review Team calculations.

Figure 9–2 shows Presidio ISD transportation cost per bus compared to those of a set of peer districts whose size, demographics, and geographic location closely align to Presidio ISD. Identified peer districts are Santa Rosa, Tornillo, Monte Alto and Muleshoe independent school districts.

As shown in **Figures 9–1** and **9–2**, the bus cost per student in Presidio ISD is approximately \$1,041, which is 22 percent lower than the average of its peer districts. The lower average is the direct result of the district transporting all grades of students on the same buses with a single-tier routing system, which allows the district to effectively employ a minimum number of buses to transport its students.

Bus operations performance is measured by a calculation of the number of buses required for 100 students. The range for highly efficient operations is typically 1.0 to 1.3 buses per 100 students. Presidio ISD’s value is higher than the range for a highly efficient operation at 4.7 buses per 100 students (20 buses/426 students*100). The district’s average compares to a peer district average of 3.8 buses per 100 students, as shown in **Figure 9–2**.

State transportation funding for regular program students is allotted using the preceding school year’s linear density and

**FIGURE 9–2
PRESIDIO ISD AND PEER DISTRICTS COST PER BUS
SCHOOL YEAR 2011–12**

DISTRICT	COSTS	BUSES	STUDENT RIDERS	COST PER STUDENT RIDER	ANNUAL COST PER BUS BASED ON TOTAL BUSES	BUSES PER 100 STUDENTS TRANSPORTED	AVERAGE STUDENTS PER BUS
Muleshoe	\$623,660	21	386	\$1,616	\$29,698	5.4	18
Santa Rosa	\$399,836	12	440	\$909	\$33,320	2.7	37
Tornillo	\$406,426	8	291	\$1,397	\$50,803	2.7	36
Peer Average	\$476,641	14	372	\$1,281	\$34,046	3.8	27
Presidio	\$443,267	20	426	\$1,041	\$22,163	4.7	21
Presidio ISD Average – Over (Under) Peer Districts	(\$33,374)	6	54	(\$240)	(\$11,883)	0.9	(6)

NOTES: Data for Monte Alto ISD was not available; Totals may not sum due to rounding.

SOURCES: Texas Education Agency School Transportation Operation and School Transportation Route Services Reports for school year 2011–12; School Review Team calculations.

cost per mile. Linear density of bus routes is determined based on the number of regular riders carried per mile of regular bus routes during the school year. The Texas Education Code (TEC), Section 42.155, defines regular program students as students who reside two or more miles from their school of regular attendance. The cost-per-mile allocation is based on data submitted in the School Transportation Route Services Report and the Student Transportation Operation Report. The amount of state funding that a district receives for transportation is based on the actual cost per mile or the maximum allotment value within which the district falls, as shown in **Figure 9–3**. In school year 2011–12, Presidio ISD’s cost per mile was \$2.50 for regular program students, and its linear density was 1.05. Based on the calculated annual mileage of 73,638 and the linear density rate of 1.05 (73,638 x \$0.97 per mile), the district received an allotment of \$71,429 for regular program

students, which is the maximum allotment rate for a linear density ratio of 1.05. **Figure 9–3** shows the linear density groups and maximum allotment per mile used by TEA beginning in school year 2011–12.

**FIGURE 9–3
LINEAR DENSITY GROUPS
SCHOOL YEAR 2011–12**

LINEAR DENSITY GROUP	MAXIMUM ALLOTMENT PER MILE
2.40 and above	\$1.43
1.65 to 2.399	\$1.25
1.15 to 1.649	\$1.11
0.90 to 1.149	\$0.97
0.65 to 0.899	\$0.88
0.40 to 0.649	\$0.79
Up to 0.399	\$0.68

SOURCE: Texas Education Agency School Transportation Allotment Handbook, Effective School Year 2011–12.

ACCOMPLISHMENTS

- ◆ Presidio ISD established a “Make Ready” activity bus inspection procedure that promotes vehicle readiness and safety.
- ◆ Presidio ISD’s transportation director performs at least one weekly observation of bus arrivals and departures at schools and on-route inspections to promote order and safety when unloading and loading buses and to provide an added level of security during route times.

FINDINGS

- ◆ Presidio ISD policies and procedures for transportation and school bus safety do not provide enough specificity.
- ◆ Presidio ISD does not have operating procedures for drivers and staff in use of the two-way radios on school buses.
- ◆ Presidio ISD mechanics are not properly trained as school bus mechanics.
- ◆ Presidio ISD school bus mechanics do not hold proper licenses to operate a Class B commercial vehicle.
- ◆ Presidio ISD does not perform bus emergency evacuation drills.

RECOMMENDATIONS

- ◆ **Recommendation 45: Develop a department-specific manual of transportation policies and procedures.**
- ◆ **Recommendation 46: Establish operating procedures for drivers and office staff for use of the two-way radio system installed in buses.**
- ◆ **Recommendation 47: Investigate options to provide training and documentation for non-English-speaking mechanics.**
- ◆ **Recommendation 48: Upgrade the licenses of school bus mechanics to comply with commercial driver license law.**
- ◆ **Recommendation 49: Develop emergency evacuation procedures and drills to ensure passenger safety in the event of an emergency, and perform as required in statute.**

DETAILED ACCOMPLISHMENTS

ACTIVITY BUS INSPECTIONS

Presidio ISD established a “Make Ready” activity bus inspection procedure that promotes vehicle readiness and safety.

When an activity bus is returned from a trip, the returning driver completes a post-trip inspection report and includes a “Make Ready” comment. This action initiates a work order by the transportation director. The next day, a mechanic checks all fluid levels; inspects all equipment for damage; inspects fire extinguishers, the first aid kit, and emergency triangles; inspects tires; fills the vehicle with fuel; cleans the interior and exterior of the bus; and files a mileage report for billing purposes.

Because Presidio ISD activity buses are often operated by coaching and teaching staff who report to the Transportation Department before an athletic event for vehicle assignment, this procedure reduces the time the coach/teacher is out of the classroom. In reviews of other transportation departments, the scope of this particular procedure is often limited to a driver completing a post-inspection report and noting any concerns with the mechanical effectiveness of the vehicle or lack of safety equipment (fire extinguisher, first aid kit). The level of vehicle readiness this procedure affects is more than what is typically provided and should be emulated by other departments. The procedure also promotes safety and

readiness for the department and on-time performance of scheduled trips.

MONITORING PERFORMANCE

Presidio ISD’s transportation director performs at least one weekly observation of bus arrivals and departures at schools and on-route inspections to promote order and safety when unloading and loading buses and to provide an added level of security during route times.

The weekly route check ensures that drivers are where they are supposed to be at the appropriate time at any given point along bus routes. These actions are a valuable evaluation tool for the district’s drivers and provide an extra level of security for student safety.

These weekly monitoring checks are especially important given the district’s location. Presidio ISD’s bus routes operate in very remote areas with little vehicular traffic. The checks also are important considering the constant presence of multiple law enforcement agencies in the region, which could cause disruptions or security concerns for district transportation services.

DETAILED FINDINGS

SAFETY POLICIES AND PROCEDURES (REC. 45)

Presidio ISD policies and procedures for transportation and school bus safety do not provide enough specificity.

Presidio ISD’s website does not include information related to the operations of the Transportation Department other than a contact name, phone number, and hours of operation. Existing Presidio ISD policies and procedures related to transportation can be found in the district’s Student Handbook for school year 2013–14, but most appear to be standard information and do not contain district-specific information. The handbook and/or website provide for basic information such as:

- eligibility requirements for district transportation services;
- posting of bus stops at the beginning of each year and subsequent changes;
- approved alternate pick-up and drop-off points other than residences; and
- standards of behavior while riding in district vehicles and school buses.

In addition, while a policy on transportation of homeless students is accessible on the district website, there are no policies regarding the transportation of students with special needs or students with short-term transportation needs.

Further, Presidio ISD has no specific written policies or procedures for the safety of students at the school bus stop or around the school bus during the loading and unloading process. While this information is provided to school bus drivers in training sessions through Texas School Bus Driver Recertification Course, Module 6, the district does not appear to have an established procedure for sharing information with students and parents. Bus stop safety procedures that are not readily available in written format include:

- how far a student may be expected to walk to a bus stop;
- how students are expected to wait for the bus at the bus stop;
- how students are expected to board and exit the bus at the bus stop;
- where students should or should not be around the school bus;
- how far in front of the bus a student should be when crossing in front of the bus;
- why students should never cross behind a school bus; and
- how long a student is expected to be at the bus stop before a scheduled arrival.

More students are killed each year in accidents that occur around the bus than in the school bus. These events included students being struck by motorists passing school buses, and students being struck by their own school buses. According to the 2012–2013 National School Bus Loading and Unloading Survey, in an annual loading zone fatality report issued by the Kansas Department of Education, 33.3 percent of students killed in the loading and unloading process were attributed to the school bus; 66.7 percent of fatalities involved other vehicles illegally passing a stopped school bus while loading or unloading students. These statistics demonstrate the importance of ensuring that all stakeholders, including community members, have access to school bus safety information.

Transportation policies and procedures are necessary to define the responsibilities of department staff and stakeholders, provide service-level expectations, and ensure the safety of students. Stakeholders include school bus drivers and aides, district office staff, school administration and staff, students, parents, and community members. In the absence of such policies and procedures, transportation operations are not likely to meet industry standards for safety and service. The principal concern in school transportation is the safety of students when traveling to and from school or on school-associated trips. The development and adoption of department and safety-related policies and procedures helps to ensure the safe transportation of district students from the time they leave their homes to their arrivals at their destinations.

The Virginia Beach, Virginia, public school system website links to a school bus safety section about tips for students on buses, at bus stops, and while walking to school. The page also includes a diagram illustrating the danger zone around a school bus, where students need to be most careful when the bus arrives and departs the bus stops. The information provides clarity to students and parents as to their respective responsibilities in transportation. The information may be found at www.vbschools.com.

The district should develop a department-specific manual of transportation policies and procedures.

The district should begin a review of its current policies, the Student Handbook, and its documented and undocumented procedures with two goals. First, the review should help the district to refine current policies and guidelines. Then, the review should help to identify areas where no policy currently exists. Given the size of the operation, the development of policies and procedure should not be overly complex and should cover the primary areas that have a direct impact on transportation planning and safety. The process for implementation could include an examination of the current legal and local policies at other districts, along with a review of other districts' student handbooks.

Policies and corresponding practices that directly impact the safety of students should be the first priority and should include clarifying information related to:

- walk-to-stop distances;
- behaviors at bus stops and around the bus;
- approval processes for students with special needs; and

- timelines to establish services for all students.

Additional policy considerations should be given to the transportation of students with special needs. These include:

- approval processes based on the student's Individual Educational Plan (IEP);
- the position or positions responsible for determining eligibility within the IEP;
- staff responsibility for informing the Transportation Department of a request for services;
- a timeline to establish services; and
- behavior or medical information that will be provided to the department to effectively provide proper services while on board the bus.

The district should publish transportation policies and procedures relevant to students and the general public on its website.

This recommendation could be implemented with existing resources.

TWO-WAY RADIOS (REC. 46)

Presidio ISD does not have operating procedures for drivers and staff in use of the two-way radios on school buses.

Presidio ISD has two-way radio systems installed on school buses that include one channel for normal, informational exchanges between the driver and the bus garage, and a second channel that allows drivers to directly contact 911 officials in the event of an emergency. Presidio ISD is fairly unique in having direct radio contact with 911 officials. The system was installed due to a variety of issues, including border security concerns that have been described previously. The reach of mobile phones is also limited in many parts of the district because of the lack of cell towers in the area. Given the distances traveled by school buses, there is a possibility of losing radio contact on normal channels for communications.

According to the transportation director, the district has no written operating procedures for the two-way radio system that identify what types of incidents involving a school bus constitute an emergency, and when a driver should contact 911 officials using the radio system. The bus drivers now contact the Transportation Department and rely on the transportation director for direction.

The Brandywine School District in Wilmington, DE, in its 2011–12 Handbook for Drivers and Bus Attendants, has an example of appropriate radio procedures. The district employs a condensed version of the 10-code that is used by most law enforcement agencies across the United States, and includes the most common codes that a school district may require. Examples of these codes are:

- 10-1: Situation OK, I am all right;
- 10-4: OK, message understood;
- 10-10PD: Accident – property damage accident (no one is injured);
- 10-10PI: Injury accident;
- 10-13: Weather warning;
- 10-27: Police are needed;
- 10-44: Ambulance is needed;
- 10-100: Emergency message follows, all units clear the frequency;
- 10X: Confirmed, gun on board; and
- 10K: Confirmed, knife on board.

The district should establish operating procedures for drivers and office staff for use of the two-way radio system installed in buses.

Procedures and training should be developed in both English and Spanish and disseminated to Transportation Department staff. The district should coordinate with appropriate local law enforcement agencies to identify the types of incidents and associated communications procedures required for using the 911 radio channel. It is important to distinguish between the types of emergencies to be reported on the 911 channel versus the types of situations that are to be reported on the normal channel for communications.

Presidio ISD administration should work with the Presidio Police Department and the Presidio ISD Department of Public Safety to implement this recommendation. The district's Department of Public Safety (DPS) coordinates activities with the many law enforcement agencies operating in the Presidio area. Basic steps for implementation could include:

- identify a key stakeholder group to develop operating procedures; the group should include the Transportation director, a school bus driver, the Transportation clerk, 911 dispatch officials, a

member of DPS, and representatives of the other law enforcement agencies in the area;

- define the purpose of the policy to ensure mutual understanding;
- determine what types of communications should be kept to the normal communications channel with the bus garage and what types are appropriate for the 911 channel;
- define levels of emergency, provide examples, and assign the appropriate communication channel;
- develop a list of code words or numbers for drivers to keep communications short but definitive, such as a 10-code list employed by emergency responders;
- provide training for appropriate Transportation Department staff in simulated situations to develop confidence in the event of an actual emergency; and
- include procedures training in new employee and in-service training.

This recommendation could be implemented with existing resources.

MECHANIC TRAINING (REC. 47)

Presidio ISD mechanics are not properly trained as school bus mechanics.

The district employs two mechanics to provide service to the fleet of school buses and district administrative vehicles, but Presidio ISD school bus mechanics have not received appropriate training in school bus maintenance and repair. One of the mechanic's job descriptions includes the title of lead mechanic. According to the Presidio ISD job description for this position, the primary responsibility is to "perform major mechanical repairs with minimal supervision to ensure proper performance and safety of district vehicles." Additional qualifications, responsibilities, and duties include, but are not limited to:

- advanced knowledge of diesel and fuel engine maintenance and repair;
- ability to diagnose mechanical problems and perform repairs independently; and
- ability to evaluate mechanical problems in vehicles using diagnostic equipment.

However, interviews with the superintendent and the transportation director indicated that district mechanics do not receive any formal training specific to school buses, particularly in the area of diesel engine diagnostics. Both mechanics are self-taught, having performed repairs on vehicles within a family business and in local vehicle repair shops. The superintendent reported he supports additional training for the district's mechanics.

The transportation director and both mechanics attended a 12-hour session on Blue Bird bus body and bus repair in August 2012 and received certification of completion for the training. However, the Transportation director reported that the district's mechanics do not speak English, and the director did not believe the mechanics understood the training to a sufficient level to be able to diagnose maintenance problems. Thus, training opportunities for the mechanics have not been maximized due to language issues. As a result, the transportation director must assist in diagnostics and then relay the information to the mechanics for completion of the repairs.

The current situation risks the possibility of buses not being repaired in a timely fashion if the director is unavailable, and the district has a limited number of spare buses. Not only does this situation take time away from the director's other responsibilities, but any vehicles that cannot be repaired at the district level must be outsourced to a local repair facility. If the vehicle is not repairable locally, it must be delivered to a certified dealer in El Paso or Midland/Odessa, which are at least 230 miles away, for repair. The transportation director and the superintendent have identified this situation as an area of concern that has not been addressed. While staff language issues are common in Texas, very little mechanics training or documentation for mechanics appears to be available in Spanish to support staff professional development, and there is no standard to provide repair manuals in other languages in the school bus industry. The National Association for Pupil Transportation indicated that no materials or sources of materials were available in Spanish. An Internet search and phone inquiries to a Cummins diesel engine dealer and a Blue Bird school bus vendor in Texas did not locate training materials available in Spanish.

The district should investigate options to provide training and documentation for non-English-speaking mechanics.

In addition, the district should take these circumstances into consideration in making future purchases of vehicles, and work with vendors to gain access to manuals in appropriate

languages. This requirement can also be included in future school bus purchase specifications, and for the purchase of district administrative and facilities vehicles.

Specific engine information, including the model number and serial number of the engine, is required to obtain school bus repair manuals of any type, regardless of language. It is important for the mechanics to have access to manuals they understand to perform their job responsibilities. The transportation director should implement the following steps to acquire the appropriate manuals:

- collect and record the specific model and serial numbers of the Cummins bus engines used in Presidio ISD;
- contact the respective Cummins engine vendor in El Paso and/or Odessa/Midland; and
- contact Cummins/Mexico at servicio@mex.cummins.com if the material is not available through local vendors.

The availability of repair manuals in Spanish is unknown at this time. Therefore, a fiscal impact is not assumed for this recommendation.

LICENSES OF SCHOOL BUS MECHANICS (REC. 48)

Presidio ISD school bus mechanics do not hold proper licenses to operate a Class B commercial vehicle.

The district's mechanics currently hold a Class C license that only allows a person to operate automobiles and pickups. The Presidio ISD job description for mechanics includes a requirement that a mechanic hold a Class B commercial driver license. A Class B commercial driver license allows a person to operate a single vehicle that has a Gross Vehicle Weight Rating of more than 26,000 pounds, for which Presidio ISD's larger school buses qualify. There is no requirement that the mechanics hold a school bus endorsement, as the mechanics are not required to operate the school buses as drivers while children are on board. However, the mechanics drive the buses on public roadways for test drives after certain repairs are completed and thus are required to hold the Class B commercial driver license.

The Texas Department of Public Safety provides clear instructions, required identification requirements, and a list of qualifications for applicants for a Class B commercial driver license. The documentation for this process can be found at www.txdps.state.tx.us.

The district should upgrade the licenses of school bus mechanics to comply with commercial driver license law.

The Transportation Department has a certified trainer on staff that can provide required training for mechanics and prepare them for the written and road testing requirements for the commercial driver license.

These steps are recommended to implement this recommendation:

- segment the training for the written portion of the test into manageable modules, each with its own timeline;
- provide sample testing on each segment as it is completed;
- provide sample testing for the entire written portion of the test as training is completed;
- have mechanics apply to the Texas Department of Public Safety for a Class B commercial license, and take and pass written tests to obtain temporary commercial driver permits;
- provide commercial driver training for the road test portion of the training as needed; and
- have mechanics take and pass road portion of testing.

Because previous attempts to have mechanics upgrade their licenses have been unsuccessful, the district should identify a time limit by which the upgrade is to be completed, for example, three months.

The cost to the district to implement this recommendation is \$1,200, and includes:

- one-time training for two mechanics at \$150 each (\$300 total);
- medical certification at \$75 per year (\$150 total per year); and
- CDL license at \$75 each (\$150 total).

Annual medical re-certification is required, and a five year renewal of the Commercial Driver's License is required. The district currently pays these costs for bus drivers.

EMERGENCY EVACUATION DRILLS (REC. 49)

Presidio ISD does not perform bus emergency evacuation drills.

The Transportation Department has no records on file to show completion of student emergency evacuation drills from school buses. Focus group discussions with parents, teachers, and administrators all confirmed that drills have not been conducted in the previous five years. Staff was not clear why the drills have not been completed. The transportation director stated that school bus safety rules are discussed in the classroom with the bus drivers and supported by building principals and teachers. No supporting documents were available to verify that student training in school bus rules took place.

Presidio ISD also provides transportation of students to athletic events and extra-curricular trips on district-owned activity buses. Students on these trips may not normally ride a school bus to and from school and may not have received information provided to regular bus riders. Other adults on the activity bus, acting as chaperones, may not have received training.

The transportation director, who is in his second year in this role, reported that he was aware that evacuation drills have not been performed. He said he had purchased the Safe Pupil School Bus Evacuation Training Compliance Kit at a cost of \$150 and was scheduling training for drivers, aides, students, and school administration. The planned completion of the training and the evacuation drills was by the end of January 2014.

The lack of drills risks a potentially dangerous situation if an event such as a fire or accident occurs while students are on a district school bus. Students should be trained to be aware of the actions they must take when a bus needs to be evacuated. Actions include: knowing if and when they should evacuate through the front and/or rear doors; when to use side window emergency exits, emergency roof exits, or front and rear emergency pop-out windows; and the proper operation of these exits. Students should also be trained in what to do if the driver becomes incapacitated during the general operation of the bus or as a result of an emergency event. Students also need to know to move at least 100 feet away from the bus and to stay together after an evacuation. An example of the effectiveness of this recommendation is detailed in a Hillsborough County, Florida, news article, when a school bus caught fire with students on board, and all passengers exited safely as a result of evacuation drills.

The Texas Education Code, Chapter 34, Sec. 34.0021, School Bus Emergency Evacuation Training, states in part:

- school districts may conduct at least two training sessions per year for students and staff;
- one session should be scheduled during the fall;
- a portion of each training session should be based on procedures or specifications adopted by the National Congress on School Transportation or another similar manual on school transportation safety; and
- certification that the training was completed must be presented to the Texas Department of Public Safety within 30 days of completion.

The Texas Department of Public Safety provides an online form, SBT-7, for districts to complete and submit to the department within 30 days upon completion of evacuation drills. A copy of this form can be found at www.txdps.state.tx.us.

An example of a plan to provide school bus emergency evacuations training and drills is provided by Brandywine School District in Wilmington, Delaware. The district's employee handbook describes who is involved in emergency evacuations and the responsibilities of each person. The plan includes a description of emergency equipment and its location on the bus; the plan also indicates that an explanation of evacuation procedures is provided for riders before each athletic and extra-curricular bus trip.

The district should develop emergency evacuation procedures and drills to ensure passenger safety in the event of an emergency, and perform as required in statute.

Basic steps for the implementation of this recommendation include:

- schedule the training sessions in the fall of the school year, and structure the session so that it applies specifically to bus passengers;
- conduct a portion of the session on a school bus;
- design the training to last at least one hour;
- perform actual evacuations via front and rear doors with students on school grounds, with observation by school staff; and
- demonstrate the operation of emergency window exits, emergency roof hatch exit, and front service door and rear emergency doors.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 9: TRANSPORTATION							
45. Develop a department-specific manual of transportation policies and procedures.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
46. Establish operating procedures for drivers and office staff for use of the two-way radio system installed in buses.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
47. Investigate options to provide training and documentation for non-English-speaking mechanics.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
48. Upgrade the licenses of school bus mechanics to comply with commercial driver license law.	(\$150)	(\$150)	(\$150)	(\$150)	(\$150)	(\$750)	(\$450)
49. Develop emergency evacuation procedures and drills to ensure passenger safety in the event of an emergency, and perform as required in statute.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	(\$150)	(\$150)	(\$150)	(\$150)	(\$150)	(\$750)	(\$450)

CHAPTER 10
COMPUTERS AND TECHNOLOGY

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 10. COMPUTERS AND TECHNOLOGY

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, electronic instructional materials). Instructional technology supports curriculum delivery, classroom instruction, and student learning.

Texas state law requires school districts to prepare improvement plans that include the integration of technology with instructional and administrative programs. A plan defines goals, objectives, and actions for technology projects; assigns responsibility for implementation steps; and

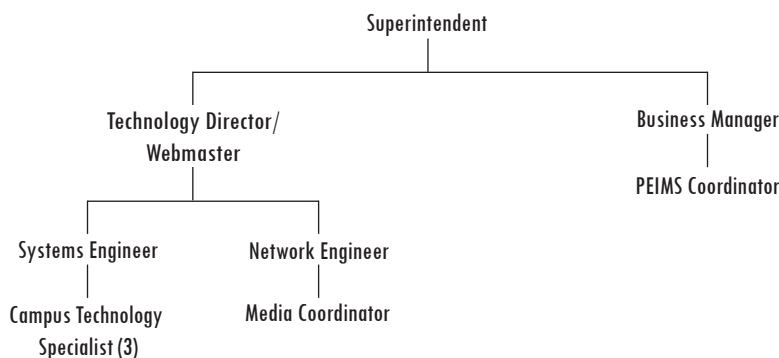
establishes deadlines. The state provides a tool for planning and assessing school technology and readiness, which identifies performance measures for teaching and learning, educator preparedness, administration, support services, and infrastructure.

The Presidio Independent School District (ISD) Technology Department is responsible for supporting a range of district instructional and administrative tasks. The district uses the Texas Enterprise Information System (TxEIS) plus, a state-sponsored student information system for managing student services, business services, and PEIMS reporting. TxEIS is administered through Regional Education Service Centers XI (Region 11) and XX (Region 20) and supported by Regional Education Service Center XVIII (Region 18) for the districts in its region.

The department is led by a technology director who reports to the superintendent. The technology director also serves as the district's webmaster. Department staff includes a systems engineer, network engineer, three campus technology specialists (one for each campus), and a media coordinator. The district also has a PEIMS coordinator with responsibility for coordinating the submission of student, personnel, and financial data to the Texas Education Agency (TEA). The PEIMS coordinator reports to the business manager. The district does not have a dedicated instructional technology position.

Figure 10–1 shows the current Presidio ISD technology and PEIMS organization for school year 2013–14.

FIGURE 10–1
PRESIDIO ISD TECHNOLOGY DEPARTMENT AND PEIMS ORGANIZATION, SCHOOL YEAR 2013–14



SOURCES: Presidio ISD, Technology Department, December 2013; School Review Team, Interview with technology director December 2013.

ACCOMPLISHMENT

- ◆ The Presidio ISD Community Network provides a valuable service and expands learning opportunities for students and the community at large.

FINDINGS

- ◆ Presidio ISD's Technology Department has not developed written procedures or standards to guide technology operations.
- ◆ Presidio ISD lacks a comprehensive technology planning process, including a needs assessment.
- ◆ Presidio ISD's Technology Department lacks a network disaster preparedness and recovery plan.
- ◆ Presidio ISD lacks a methodology to ensure its website contains current information and is compliant with state requirements.

RECOMMENDATIONS

- ◆ **Recommendation 50: Develop and publish technology-related standard operating procedures.**
- ◆ **Recommendation 51: Develop a technology planning process including a formal needs assessment.**
- ◆ **Recommendation 52: Expand the Emergency Operations Plan to include a network disaster preparedness and recovery plan that allows the district to maintain operations in the event the network is compromised and rendered inoperable.**
- ◆ **Recommendation 53: Assign clear responsibilities and schedules for updating and maintaining district and campus web pages to improve communication and to ensure compliance with state statutory requirements.**

DETAILED ACCOMPLISHMENT

EFFECTIVE OUTREACH

The Presidio ISD Community Network provides a valuable service and expands learning opportunities for students and the community at large.

Presidio is a community along the U.S.-Mexico border with a 2011 median household income of \$20,570, which is well below the 2011 state median household income of \$49,392. The Presidio county population in 2012 was 4,266.

Communities with these statistics often lack technology infrastructure, and Internet access is not seen as affordable for all.

However, the Presidio Community Wireless Network (PCWN) provides free wireless broadband Internet access for all Presidio residents, businesses, and visitors. The district's goals in supporting the PCWN are to increase computer literacy for all district residents and provide open pathways to viable employment. Any community member who signs up can have basic Internet service at no cost. The community network also provides students with the opportunity to work on assignments at school or at home.

Technology staff reported that another district goal in providing the community wide technology access is to initiate and support partnerships with medical facilities; community, state, and federal offices in the area; online training sites; and other educational institutions. The partnerships provide the Presidio community with added value in community service. In this way, learning opportunities for students and other members of the community are expanded. For example, staff said that community members use the Internet to schedule doctor appointments, address Social Security needs, and take college and university courses online. Through the basic Internet access, individuals who sign up for distance learning courses can access Sul Ross State University, Odessa College, the University of Texas of the Permian Basin, and the University of Texas at Austin and attend college online.

The district initiated the PCWN in 2010 at an initial cost for the wireless network of \$150,000, with 27 wireless nodes located throughout the city. In school year 2011–12, the district implemented an effort to upgrade and expand the legacy network to provide greater coverage and more reliable service throughout the city with an additional 60 nodes, a server, and a network equalizer to assist in load balancing of traffic. The cost for the upgrade was \$410,000. Currently, staff reported the only PCWN expense anticipated for the next five years is the software license cost of approximately \$5,000 annually.

The school district continues to support PCWN with online resources for students and staff, which includes e-mail, a parent portal, and online classroom software. Presidio's technology director stated, "Since finishing Phase 1, we've seen an increase of 50 users to the system and I look forward to growing PCWN's range and availability."

DETAILED FINDINGS

WRITTEN PROCEDURES AND STANDARDS (REC. 50)

Presidio ISD's Technology Department has not developed written procedures or standards to guide technology operations. Interviews with technology staff members indicated that while a certain set of standard practices are understood and typically followed, there is no written documentation establishing departmental standards or procedures.

EQUIPMENT

Presidio ISD's Technology Department has no written hardware and software standards for purchasing new equipment. Such specifications would include standards on memory, operating system version, wireless integration, and standard software. There is an informal understanding among staff that the department only uses the Windows operating system; however this practice is not formally documented.

Additionally, take home device documents lack information. The district's Responsible Use Policy for Teachers, Use Principles for Students, and the Student Pledge for Laptop Use all lack specific information related to serial numbers, conditions, and ages of the devices. The department is also not disseminating information to students, teachers, and parents regarding the one-to-one computer-to-student school environment the district is working towards.

Technicians have access to portable devices, such as high-density data, portable storage devices and other equipment, but inventory control sheets are not used to monitor when items are removed from the storage closet.

Without documented procedures and standards for technology equipment, technology functions may be carried out in an inconsistent and inefficient manner. Hardware and software standards help vendors provide better products and more accurate quotes and make it easier for the district to review bids; without documented standards this process may unnecessarily consume time and resources. Additionally, Presidio ISD's lack of inventory control documentation makes tracking technology equipment more difficult and time consuming and limits the district's ability to monitor damage and loss.

BACKUP PROCEDURES

The district network is being backed up, but written documents do not exist. Documentation of the district's

e-mail retention plan and e-mail address and password conventions are also not available.

The technology director oversees the major backup functions. Should the technology director be unexpectedly absent, Presidio ISD's Technology Department staff may not be able to implement standard backup procedures without documentation.

According to the Texas State Library and Archives Commission's interpretation of the provisions of Government Code Section 441, e-mail messages are official state records and should be managed in accordance with the agency's authorized records retention schedule. E-mail messages residing on agency computers should be made available to the public upon request under the Public Information Act unless the record fits an exception to disclosure described in Government Code Section 552.101 through Section 552.132. At Presidio ISD, the end-user of the e-mail system is responsible for classifying and disposing of e-mail. Without documented procedures for e-mail retention, the district cannot ensure compliance with statute.

NETWORK ACCESS

Documentation is not available to capture when remote access is provided to a technology staff member. Typically, a user requesting connection to a processing system from a remote location through a virtual private network (VPN) submits a signed VPN Access Authorization form. This form specifically requires use of anti-virus software on the user's computer and use of a hardware firewall to prevent an unauthorized user from connecting to their VPN client computer from the Internet. However, without formal documentation of remote access security requirements, Presidio ISD is at risk of computer viruses and unauthorized access.

The lack of written procedures and documentation can result in functions being carried out in an inconsistent, ineffective, and inefficient manner. A 2003 document titled *In Helping Schools Make Technology Work*, the Texas Comptroller of Public Accounts states:

“Unwritten rules are simply no substitute for clearly outlined procedures. Districts need clear policies and procedures for the purchase of technology, its acceptable use, the application of copyright laws, and the control of software and hardware inventories. The district will find it hard to defend itself against criticism when an employee acts outside of an unwritten rule—there is

little proof that the individual was acting without express authority.”

Documented procedures and standards provide clear direction to staff and protect the district from operations disruptions and loss of information in the event of staff turnover. Written documentation on technology processes also provides new staff members with standardized practices and makes assimilation easier.

Written procedures support technology operations and can be used for reference and training purposes. Fabens ISD has a Standard Operating Procedures (SOPs) document at www.fabensisd.net. The Fabens ISD SOP document contains guidelines for password, e-mail, remote management, equipment repurposing, equipment disposal, equipment checkout, software copying, donated equipment, and powering off computers.

The district should develop and publish technology-related standard operating procedures.

The technology director, working with other department staff, should identify technology functions and activities that require procedures or standards to be compliant and effective. On an annual basis, the district should review and update its SOPs. Technology Department staff can develop processes and procedures and present the SOPs to the administration for approval.

This recommendation could be implemented with existing resources.

Since the review team’s onsite work, Presidio ISD’s Technology Department has introduced a foundation document that includes SOPs for work orders and for hardware and software purchasing.

TECHNOLOGY PLAN (REC. 51)

Presidio ISD lacks a comprehensive technology planning process, including a needs assessment. At the time of the onsite review, the district had not submitted a current Long-range Technology Plan (LRTP) to TEA, risking the loss of state technology funding. Presidio ISD’s technology plan dated 2010–13 was out-of-date, and its TEA 2010 Technology Plan Approval Certificate expired on June 30, 2013.

The district has not conducted a formal written technology needs assessment in the past three years. The National Center for Education Statistics (NCES) has defined needs assessment

as, “an evaluation of the technical tasks and functions an organization must be capable of performing (that it currently isn’t) or the needs that technology must be able to meet (that are not currently being met). A true needs assessment requires that all possible needs be identified.”

The Technology Department has strong administrative support, adequate budget, District Improvement Plan goals and objectives, and strong evidence in the School Technology and Readiness (STaR) Chart that the technology is in place. However, the district lacks an updated technology plan that incorporates results from a technology needs assessment.

A technology plan reflects the district’s current technology status; determines areas of need and identifies goals, objectives, and strategies to meet those needs; and allocates funding for meeting objectives. TEA requires Texas public school districts and charter schools to submit a technology plan through the ePlan system. Districts’ eligibility for the Universal Service Administrative Corporation (USAC) Schools and Libraries Program, commonly known as E-Rate, along with other state and federal programs, is dependent on this plan. Presidio ISD has set high standards for technology and has matched those efforts with the needed funding, but it is in jeopardy of losing its eligibility for E-Rate funding because it has not submitted the required technology plans.

E-Rate requirements include the submission of technology plans prior to submission of the USAC Form 470. The Texas ePlan system provides a timestamp of the plan date, which can serve as proof that the requirement has been met. The district’s outdated 2010–13 LRTP has a written statement, “The district had a written plan on 11/26/2012 before E-Rate Form 470 was filed on 12/10/2012.” This statement is correct for funding year 2013 (July 1, 2013 through June 30, 2014) for which Presidio ISD filed its E-Rate 470 applications. However, on December 31, 2013, Presidio ISD filed five E-Rate Form 470s for funding year 2014 (July 1, 2014 through June 30, 2015) that are not based on an updated written plan, which would make some of these applications noncompliant.

Presidio ISD has a technology committee that includes students, teachers, and campus administrators. Previously, the technology director has overseen development of the LRTP with input from the technology committee. However, although Presidio ISD’s TEA 2010 Technology Plan Approval Certificate has expired, a new three-year plan had not been submitted at the time of the onsite review.

TEA developed the STaR Chart for use by campuses and districts in evaluating progress of curriculum integration and alignment with the goals of the state’s *Long-Range Plan for Technology, 2006–2020*. The four components of the STaR Chart include Teaching and Learning; Educator Preparation and Development; Leadership, Administration, and Instructional Support; and Infrastructure for Technology. Each component has four levels of progress: Early Tech, Developing Tech, Advanced Tech, and Target Tech. **Figure 10–2** shows the key components, focus areas, and scoring within each. Teachers complete the teacher

assessment, and then campus principals complete a campus assessment and sign off on the campus results.

Figure 10–3 shows a summary of average STaR Chart ratings for Presidio ISD and its peer districts, with both the rating for level of progress and the actual score assigned to each of the components. Peer districts are districts similar to Presidio ISD that are used for comparison purposes. These districts are Monte Alto ISD, Muleshoe ISD, Santa Rosa ISD, and Tornillo ISD.

**FIGURE 10–2
TEXAS CAMPUS STAR CHART COMPONENT, FOCUS AREAS, AND SCORING**

COMPONENT	FOCUS AREAS	SCORES DEPICTING LEVELS OF PROGRESS
Teaching and Learning	Patterns of classroom use	Early Tech (6 to 8 points)
	Frequency/design of instructional setting using digital content	Developing Tech (9 to 14 points)
	Content area connections	Advanced Tech (15 to 20 points)
	Technology application	Target Tech (21 to 24 points)
	TEKS implementation	
	Student mastery of technology applications (TEKS)	
	Online learning	
Educator Preparation and Development	Professional development experiences	Early Tech (6 to 8 points)
	Models of professional development	Developing Tech (9 to 14 points)
	Capabilities of educators	Advanced Tech (15 to 20 points)
	Technology professional development participation	Target Tech (21 to 24 points)
	Levels of understanding and patterns of use	
Leadership, Administration, and Instructional Support	Capabilities of educators with online learning	
	Leadership and vision	Early Tech (6 to 8 points)
	Planning	Developing Tech (9 to 14 points)
	Instructional support	Advanced Tech (15 to 20 points)
	Communication and collaboration	Target Tech (21 to 24 points)
	Budget	
Infrastructure for Technology	Leadership and support for online learning	
	Students per computers	Early Tech (6 to 8 points)
	Internet access connectivity/speed	Developing Tech (9 to 14 points)
	Other classroom technology	Advanced Tech (15 to 20 points)
	Technical support	Target Tech (21 to 24 points)
	Local Area Network/Wide Area Network	
	Distance Learning Capability	

SOURCE: Texas Education Agency, Campus STaR Chart, Fall 2013.

FIGURE 10–3
PRESIDIO ISD AND PEER AVERAGE STAAR CHART RATINGS
SCHOOL YEAR 2012–13

DISTRICT	TEACHING AND LEARNING	EDUCATOR PREPARATION AND DEVELOPMENT	LEADERSHIP, ADMINISTRATION, AND INSTRUCTIONAL SUPPORT	INFRASTRUCTURE FOR TECHNOLOGY
Monte Alto ISD	Developing Tech (14)	Developing Tech (12)	Developing Tech (12)	Developing Tech (14)
Mulshoe ISD	Advanced Tech (15)	Developing Tech (14)	Advanced Tech (18)	Advanced Tech (18)
Santa Rosa ISD	Advanced Tech (17)	Developing Tech (14)	Advanced Tech (17)	Advanced Tech (16)
Tornillo ISD	Developing Tech (14)	Developing Tech (13)	Advanced Tech (16)	Advanced Tech (17)
Presidio ISD	Advanced Tech (16)	Advanced Tech (16)	Advanced Tech (19)	Advanced Tech (19)
State Average	Advanced Tech (15)	Developing Tech (14)	Advanced Tech (16)	Advanced Tech (17)

SOURCES: Peer Campus STAAR Chart Summary (2012–13); Presidio ISD Campus STAAR Chart Summary (2012–13); STAAR Chart State Summary Statistics (2012–13).

The STAAR Chart comparison indicates that Presidio ISD's score exceeds the state average in all cases. In addition, the peer group comparison shows that the range score for Presidio ISD exceeds its peers in the areas of Educator Preparation and Development; Leadership, Administration, and Instructional Support; and Infrastructure for Technology. The range score for Teaching and Learning is within one point of Santa Rosa ISD. Presidio ISD's overall STAAR Chart status is Advanced Tech, which means that the district is performing above average in all component areas, including Teaching and Learning, which indicates the district is advanced in the instructional use of digital content, Texas Essential Knowledge and Skills (TEKS), student mastery of technology applications, and online learning are above average for instruction in the classroom.

The district outscored its peers and the state average in Educator Preparation and Development, indicating that teachers are receiving adequate professional development in technology integration. The focus area of 'Capabilities of educators' is modeled with the use of Moodle in the district. Moodle is an open-source learning platform.

The Leadership, Administration, and Instructional Support component reflects that district leadership, planning, instructional support, communication, collaboration, and budgeting are above average in the state. Teachers have access to Project Share and Google Apps through a quick link on the district's website. Project Share is an eLearning portal provided by a collaborative consisting of TEA, Epsilon LLC, and The New York Times Company. Project Share provides a digital learning environment in which teachers and students can communicate, collaborate, and access 21st century digital content. Through Project Share, teachers have access

to online professional development modules, professional learning communities, and digital content repositories. Access to the platform is available at no cost to Texas school districts. Google Apps for education can help streamline academic tasks like essay writing and class scheduling. A group of students can work together on a piece of work in Google Docs, seeing changes in real time rather than waiting for versions to be sent via e-mail. Students can see exactly when their teachers are available and vice versa with GoogleCalendar. Use of Google Apps is free.

The last indicator, Infrastructure for Technology, shows the district is on the high end of the scale and is nearing or at a one-to-one student to computer ratio and has a well-defined local area network, adequate Internet access speed, and technical support. Each campus has wireless Internet access and a campus technology specialist.

A well-written and implemented technology plan provides a framework for effective planning and decision-making, and supports the district in achieving its stated goals. It correlates with campus and district STAAR Charts and improvement plans and aligns with the state's *Long-Range Plan for Technology 2006–2020*. Additionally, technology plans formalize the needs of the district for E-Rate requests and provide the basis for developing districtwide budgets for technology. Otherwise, the technology will not be supporting the curricula and engaged learning for students.

School districts such as Liberty Hill ISD [www.libertyhill.txed.net] and Seminole ISD [www.seminoleisd.net] publish their technology plans on their respective district websites. Components of an ePlan as defined by TEA include: Introduction, Needs Assessment, Goals, Objectives,

Strategies, Budget, Evaluation, and Appendix. Katy ISD [www.katyisd.org] has formalized its needs assessment process by conducting an extensive technology assessment per campus and administrative departments using internal and external assessments and aligning the results to district goals and objectives.

The district should develop a technology planning process including a formal needs assessment.

Before considering whether to purchase new computers, software applications, or networking services, the Technology Department must identify plans for using the technology. The district should consider incorporating the following technology planning activities:

- conducting a written needs assessment;
- analyzing results of the latest STaR Charts;
- reviewing the District Improvement Plan;
- reviewing Campus Improvement Plans;
- assessing technology inventories (hardware, software, peripherals);
- studying instructional technology applications and tools used in classrooms to gauge effectiveness;
- examining Technology Department budget processes and needs;
- examining the E-Rate needs;
- establishing a realistic budget; and
- reviewing and updating the district's technology plan on an annual basis.

In developing a needs assessment, the district can use the SERVE Center at the University of North Carolina at Greensboro School Technology Needs Assessment as the foundation to build one of their own. The University of North Carolina at Greensboro has developed a School Technology Needs Assessment (STNA) to help school-level decision makers improve uses of technology in teaching and learning activities. The four functional areas meld with those of the state's STaR Chart and would provide additional support when addressing the district's technology needs. The STNA functional areas include the following categories:

- Supportive Environment for Technology Use
 - Vision and Shared Leadership
 - Organizational Conditions

- Flexible Scheduling
- Infrastructure
- Staff Support
- Media and Software
- Professional Development
 - Instruction
 - Planning
 - Professional Development Quality
- Teaching and Learning
 - Instruction
 - Planning
 - Information and Communication Technologies
- Impact of Technology
 - Teaching Practices
 - Student Outcomes

Members of Presidio ISD's technology committee are already familiar with the four component areas of the STaR Chart and can use an STNA-like assessment to provide additional data to highlight successes and determine areas of concern. The technology committee should meet on a regular basis during the revision of the district's technology plan and then meet twice annually to review progress and update the plan. This will ensure that the plan is updated prior to submission of the E-Rate Form 470.

This recommendation could be implemented with existing resources.

Since the review team's onsite work, Presidio ISD has submitted a new Technology Plan (2013-2016) which was approved by TEA on February 12, 2014 and will expire on June 30, 2016.

DISASTER PREPAREDNESS (REC. 52)

Presidio ISD's Technology Department lacks a network disaster preparedness and recovery plan.

In the event of a disaster, such as fire, flooding, hazardous materials, high winds, power interruption or surge, severe thunderstorms, tornados, or winter storms, the district's network is at risk. Without a documented disaster

preparedness and recovery plan, Presidio ISD is less able to respond quickly and efficiently, increasing the risk of equipment damage and permanent data loss in the event of an emergency. The technology director is responsible for drafting and implementing the disaster preparedness and recovery plan.

School districts develop Emergency Operations Plans (EOP) to outline responsibilities and procedures for staff in the event of an emergency. EOPs help districts respond to incidents effectively by providing predefined procedures to carry out in the event of an emergency. While Presidio ISD has an EOP describing emergency response responsibilities and procedures, this EOP does not include procedures relating to network disaster preparedness and recovery.

While there is no written documentation of the district's backup, storage, and destruction practices for student, teacher, and staff work and files, the district does implement regular backup practices. These include the following:

- the Novell network folders, which contain student, teacher, and staff files, are backed up to a server once a day Tuesday through Saturday, and a separate copy of the data is kept and updated every two months;
- e-mail is backed up to tape as it is received and then backed up remotely every night;
- the district's network has a virtual blade environment that captures backup on all district servers twice a week with four weekly and two monthly versions;
- the district security cameras are backed up on their own servers with an overwrite process approximately every 10 days. The network electronic configurations are backed up as the units are modified;
- the backup procedure for Destiny-Follett library services is done on the virtual blade environment;
- the most important backups of TxEIS student and business applications suite are uploaded to Region 18 daily; and
- the district has also installed three large power generators throughout the district to restore service during an outage.

An informal risk assessment was conducted during the physical walkthrough by the review team of the administration building and the campuses with the following results:

- the Technology Department staff does not have an access code to all the keyless control locks for the Intermediate Distribution Frame (IDF) closets;
- the rack-mounted equipment that holds servers, hard drives, switches, routers, and other computer hardware (such as audio and video equipment) were housed in closets that are not fully protected. These areas were cluttered with mops, audio visual carts, vacuum cleaners, and cardboard boxes. Additionally, these areas were dusty and contained debris, conditions that could present a possible fire hazard or temperature control issues;
- the IDF closets with rack-mounted electronics at campus facilities did not have a visible specialized clean agent extinguisher;
- all the electronic backboards need to be verified for fire retardant paint;
- the temperature monitors in the IDF closets need to be verified for accuracy, replaced, or installed;
- electrical outlets connecting computers and peripherals in classrooms and offices were overloaded;
- cables in classrooms and offices were not secured and unprotected from foot traffic;.
- off-site storage facility for backup tapes is not available.

These conditions risk creating and exacerbating potential hazards and put the district network at increased risk. The technology director is responsible for major functions, therefore, should the technology director not be available or if that position were made vacant, the district would be vulnerable without a written disaster preparedness and recovery plan.

The lack of a formal network disaster recovery plan places Presidio ISD at risk of losing critical district data and being unable to complete essential business and instructional functions in event of a disaster.

The purpose of a disaster preparedness and recovery plan is to provide a road map of predetermined actions that will reduce decision-making time during data recovery operations and ensure resumption of critical services at the earliest possible time in the most cost-effective manner. Plans also establish, organize, and document risk assessments and identify responsibilities for internal and external entities.

A well-developed disaster recovery document addresses storage and safety issues and loss prevention. The document identifies steps for maintaining network function and the school district’s operations and services following a disaster. Disaster recovery documents contain procedures and processes for conducting risk analysis, setting priorities for the recovery of information resources, testing current off-site data hosting services, and identifying which automation-based services are most critical to the district.

The Consortium of School Networking (COSN) published a document titled *Disaster Recovery Planning* in February 2012 geared for school districts. COSN defines disaster recovery planning as an ongoing process that requires detailed analysis and preparation prior to an event and clear articulation of steps for responding and recovering from an event. The planning document identifies four essential steps needed for a formal disaster recovery plan, as shown in **Figure 10–4**.

Sample disaster recovery and resumption plans are available from a variety of sources. Some examples include CISCO Systems’ *Disaster Recovery: Best Practices* (www.cisco.com) and Canutillo ISD (www.canutillo-isd.org), which includes planning instruments developed by disaster recovery committees.

The district should expand the Emergency Operations Plan to include a network disaster preparedness and recovery plan that allows the district to maintain operations in the event the network is compromised and rendered inoperable.

The technology director should form a team that includes individuals from the Public Safety, Facilities, and Maintenance Departments and campus principals to assist in writing the plan. The Technology director should be responsible for

identifying sample documents that can be used as templates for developing cost-effective solutions that address disaster recovery and data protection needs across physical, virtual, and cloud environments. Basic questions to support the planning process include the following:

- What type of business impact will occur?
- What are the preventive controls?
- What are the recovery strategies?

In addition, the team should identify a list of priority actions to improve existing conditions that contribute to potential hazards.

Fiscal impacts to the district associated with this recommendation include the following costs for addressing safety and storage issues:

One time costs estimated at \$5,325 for:

- Fireproofing all electronic backboards with fire-retardant paint (\$325);
- Purchasing clean-agent fire extinguishers (\$150 per unit x 2 units per site x 13 sites = \$3,900);
- Installing temperature control devices (\$60 per unit x 10 units = \$600); and
- Purchasing cable management materials (\$500).

Annual costs are estimated at \$100 for school year 2014–15 and \$475 for subsequent years for:

- Yearly inspections of all clean agent fire extinguishers (\$375 per year after school year 2014–15); and
- Renting a secure off-site safety deposit box storage at a local bank (\$100 per year).

**FIGURE 10–4
KEY STEPS OF A DISASTER RECOVERY PLAN**

STEP	DETAILS
Mitigation and Prevention	Actions taken to identify preventable and unavoidable disasters and to address what can be done to eliminate or reduce the likelihood of a disaster and/or accompanying risks.
Preparedness	The consideration of worst-case scenarios and development of a comprehensive plan for coordinated and effective response to any given disaster.
Response	The execution of the preparedness plan and overall management and handling of a disaster, where the effectiveness of the response is a result of the soundness of the plan.
Recovery	The efficient and timely restoration of mission-critical operations and processes, including access to vital data and information, a stable environment for teaching and learning, and other district-identified priorities.

SOURCE: Consortium of School Networking, K–12 Disaster Recovery Planning Workshop, February 29, 2012.

No fiscal impact is assumed for:

- Providing the technology staff an access code to all the keyless control locks for the IDF closets;
- Cleaning debris in electronic closet environment; and
- Inspecting the electrical outlets in classrooms and offices for overloaded outlets.

Since the review team's onsite work, Presidio ISD's Technology Department has created a provisional disaster recovery and preparedness document.

WEBSITE (REC. 53)

Presidio ISD lacks a methodology to ensure its website contains current information and is compliant with state requirements.

Presidio ISD uses an education-focused hosting service for its website that offers features and templates for providing consistent institutional information, including:

- District and school information: news, announcements, menus, events calendar, athletic scores;
- Classroom content: test dates, homework assignments, calendars, resources, photos, blogs; and
- Shared community resources: private/public documents, group calendars, and pages.

A review of the district's website found the following deficiencies:

- Campus web pages lack uniformity:
 - High school tabs: Campus Admin; Campuses; Departments; Extra-curricular; Parents; Staff Resources;
 - Elementary and middle school tabs: Admin; District Notices; Employment.
- Elementary and middle school web pages have outdated information:
 - Both campuses have dress code information dated school year 2012–13;
 - Elementary web page banner reads Soaring to New Heights in 2012–2013.
- High school web pages are under construction or are outdated:

- Many pages (such as links under Departments, Staff Resources, Parents, Extra-curricular) have no content but do include an under construction message;
- The last principal's message is dated 2012–13, with a note indicating the next installment should be posted in 4 to 6 weeks.

The review team also found instances of district website links being inconsistent with state requirements for website postings. **Figure 10–5** shows a summary of state statutory requirements for district websites and Presidio ISD's compliance with each.

The district has not clearly defined responsibilities and schedules for website maintenance and updates. The Presidio ISD technology director serves as the webmaster and is responsible for maintaining the district website. Campus web pages are maintained by staff at the campuses. Currently, the high school has assigned a staff member responsibility for updating pages, but no staff member has been assigned this responsibility at the elementary and middle schools levels. The Technology Department's media coordinator is assigned the tasks of taking photos and publicizing the school district.

Presidio ISD has a high-end web-hosting service, but the district is not maximizing use of the website. While the website has a noteworthy appearance, a visitor can immediately see that that content is outdated or missing. Further, the district does not use the site to effectively publicize its resources or successes. In addition, the district is not consistent with all state requirements for posted information. As a result, the district is limiting the usefulness of the website as a communication tool. An up-to-date website provides the community with valuable information and demonstrates that the district values communication and transparency.

One school district that engages and informs the community and publicizes its successes with its web presence is Canutillo ISD (www.canutillo-isd.org). The district has a Home Page that contains CISD News, District Announcements, Quick Links, and District Upcoming Events. Viewers are invited to view drop down menus with complete information about the district: About CISD, CISD Board, Bond, Leadership, Departments, Students, Parents, Teachers, Calendar, and School Campuses. The colors used in the website design are inviting, navigation between pages is easy, state statutory requirements are met, and there are no orphan pages—all

**FIGURE 10–5
PRESIDIO ISD’S DISTRICT WEBSITE POSTINGS AND STATUS, DECEMBER 2013**

CITATION	REQUIREMENT	PRESIDIO ISD STATUS
Texas Education Code (TEC), Sections 11.1513(d)(1)(B); and 11.163(d)	Vacancy Position Postings-10-day notice for vacant position requiring license or certificate	Employment ‘Openings’ link shows a message “no items found”
TEC, §21.204(a)-(d)	Board’s Employment Policy	Posted
TEC, §22.004(d)	Group Health Coverage Plan and Report	Not posted
TEC, §28.004(k)	Physical activity policy by campus level, health advisory council information, parent notification that physical fitness assessment results are available on request, vending machine and food service guidelines, and penalties for tobacco product use	Physical activity information posted; all other not posted
TEC, §28.010(b)	Availability of college credit courses	Not posted; only online college information
TEC, §29.916	Dates PSAT/NMSQT* and any college advanced placement tests will be administered and instructions for participation by a home-schooled pupil	Not posted
TEC, §38.019	English and Spanish lists of immunization requirements and recommendations, list of health clinics in the district that offer influenza vaccine, and link to the Department of State Health Services Internet website for procedures for claiming an exemption from requirements in §38.001, Education Code	Immunization requirements posted; all others not posted
TEC, §39.054	Notice of accreditation-warned or accreditation-probation status	Not posted
TEC, §39.084	Adopted budget	Not posted
TEC, Sections 39.106, 39.107	Improvement plan for low-performing campuses’ hearings	Posted
TEC, §39.106(e-1)(2)	Targeted improvement plan	Posted
TEC, §39.362	Academic Excellence Indicator System (AEIS) Report, district performance rating and definitions, campus report cards	Campus report cards posted for school year 2010–11; school years 2011–12 and 2012–13 not available
TEC, §44.0041	Summary of proposed budget	Not posted
Texas Local Government Code, §176.009(a)	Conflicts disclosure statements and questionnaires	Listing posted; Questionnaire not posted
Title 20 United States Code, 6316(c)(10)	Notice of Corrective Action - No Child Left Behind (NCLB) related requirements	Campus report cards posted for school year 2010–11; school years 2011–12 and 2012–13 not available
Title 19, Texas Administrative Code, Chapter 109.1005(b)(2)(A)	Superintendent’s contract	Posted
Texas Government Code (TGC), §2265.001(b)	Costs and metered amounts for electricity, water, and natural gas for district	Water [Apr-May 2013]; electricity [Jun-Jul 2013]; natural gas not posted
TGC, §402.031	Bill of rights for property owners whose property may be acquired by governmental or private entities through the use of eminent domain authority	Not Posted
TGC, §551.056	Notice of board meetings; agendas for board meeting	Posted
Texas Tax Code (TTC), §26.05(b)	Proposed maintenance and operations tax rate	Not posted
TTC, §26.16	Tax rate trend information	Posted

**FIGURE 10–5
PRESIDIO ISD’S DISTRICT WEBSITE POSTINGS AND STATUS, DECEMBER 2013**

CITATION	REQUIREMENT	PRESIDIO ISD STATUS
Update 14 Financial Accountability System Resource Guide (FASRG), Module 7.3.6.1 Submission Requirements	Annual Financial and Compliance Report	Unable to locate in newspaper or website
Update 15 (FASRG) Module 7.3.7 State Compensatory Education Audit	Campus Improvement Plans; District Improvement Plan; Evaluation of Compensatory Education	Posted
BDF (LEGAL)	Statement for Public Inspection by School Health Advisory Council	Not posted
	Check Register and Aggregate Payroll Amount	Posted

NOTE: PSAT/NMSQT= Preliminary Scholastic Aptitude Test/National Merit Scholarship Qualifying Test.
 SOURCES: Texas Education Code; Texas Local Government Code; Title 20 US Code; Title 19, Texas Administrative Code; Texas Government Code; Texas Tax Code; Update 15 Financial Accountability System Resource Guide; Texas Association of School Business Officials, May 30, 2013.

web pages take you back to the Home Page. The flow of information on these sites is natural for the reader.

The district should assign clear responsibilities and schedules for updating and maintaining district and campus web pages to improve communication and to ensure compliance with state statutory requirements.

The Technology Department could consider re-assigning webmaster responsibilities to the media coordinator as part of the duties related to publicizing the school district. The responsibilities of the district webmaster should include establishing web standards, maintaining the website templates, developing security and web accessibility guidelines, and ensuring timely updates of the district website and campus web pages. The webmaster should also be responsible for training district and campus staff on web page content and procedures.

Presidio ISD already has a basic website template and a considerable amount of usable content. A first step for the webmaster would be to review the existing site and identify prioritized needs in terms of updating content, addressing state statutory requirements, and creating new content that helps publicize district resources and successes. This plan should include the following components:

- an overall description of what the district website should look like (standardized look and feel requirements);
- a navigation map;

- steps to address immediate content needs, gaps, and errors (e.g., ensuring that the latest forms are available; updating any quotes, banners, statements; and testing and correct inoperable links, if any)
- a plan for completion of all state statutory requirements (using **Figure 10–5** as a guide);
- training for assigned individual (campus and department);
- quality assurance for uniformity of each campus site;
- quality assurance for uniformity of each department site;
- a schedule and system for monitoring web page updates; a schedule for required updates; and
- analysis and plans to address annual state statutory requirements.

This recommendation could be implemented with existing resources.

Since the review team’s onsite work, the Presidio ISD website has been updated to address some of these recommendations.

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	2014–15	2015–16	2016–17	2017–18	2018–19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 10: COMPUTERS AND TECHNOLOGY							
50. Develop and publish technology-related standard operating procedures.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
51. Develop a technology planning process including a formal needs assessment.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
52. Expand the Emergency Operations Plan to include a network disaster preparedness and recovery plan that allows the district to maintain operations in the event the network is compromised and rendered inoperable.	(\$100)	(\$475)	(\$475)	(\$475)	(\$475)	(\$2,000)	(\$5,325)
53. Assign clear responsibilities and schedules for updating and maintaining district and campus web pages to improve communication and to ensure compliance with state statutory requirements.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	(\$100)	(\$475)	(\$475)	(\$475)	(\$475)	(\$2,000)	(\$5,325)

CHAPTER 11

COMMUNITY INVOLVEMENT

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 11. COMMUNITY INVOLVEMENT

An independent school district's community involvement function requires communicating and engaging stakeholders in district decisions and operations. District stakeholders include students, staff, guardians, 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, the district's website, campus-to-home communications, extracurricular activities, and local media.

A successful community involvement program addresses both the unique characteristics of the school district and the community. A critical component of school improvement and accountability systems is a high level of community involvement. Community members and volunteers provide valuable resources that can enrich and enhance the educational system. In turn, community members directly benefit because they ultimately supply an informed citizenry, an educated workforce, and future community leaders.

Many of the challenges Presidio ISD faces are related to the location of the district. For example, due to the proximity to Mexico, some parents of Mexican descent have either voluntarily or involuntarily returned to their home country, leaving their children in Presidio to complete their education. These children may live with older siblings, relatives, or family friends. Parents who reside with their children in Presidio often commute to Marfa (60 miles) or Alpine (104 miles) for work. There is one medical clinic in the community, which employs a medical doctor who visits one day per week; otherwise, the closest U.S. medical facility is in Marfa. Presidio ISD students may live in the city or travel by school bus from Candelaria (51 miles away, estimated travel time of 1 hour and 37 minutes by automobile). Marfa ISD has an agreement with Presidio ISD to serve students who live in Redford and who are transported 16 miles to attend school in Presidio.

Despite, or perhaps because of, the remoteness of the district, there is a strong community commitment to the schools. City and county governments and the school work well together.

ACCOMPLISHMENTS

- ◆ Presidio ISD has established paid parent liaison positions that provide benefits for teachers, students, and parents.
- ◆ Presidio ISD offers a number of community services in the areas of education, health, and wellness.

FINDINGS

- ◆ Presidio ISD does not have an effective process for giving parents opportunities in areas such as board meeting participation, policy-making committees, and classroom volunteering.
- ◆ Presidio ISD does not have a way to coordinate and formalize external financial contributions for maximum effect.

RECOMMENDATIONS

- ◆ **Recommendation 54: Expand parental involvement initiatives.**
- ◆ **Recommendation 55: Establish an educational foundation to coordinate contributions to the district.**

DETAILED ACCOMPLISHMENTS

PARENT LIAISONS

Presidio ISD has established paid parent liaison positions that provide benefits for teachers, students, and parents.

In recognition of the difficulty and the value of getting parents involved in their children's education, Presidio ISD took steps in school year 2009–10 to encourage parental input by employing parent liaisons to serve as a connection between the schools and parents. Parent liaisons are bilingual parents who were described as "well-embedded in the community." These staff support teachers directly and indirectly at the elementary, middle, and high schools. One district employee said, "Parent liaisons are the bridge between the school and the community. They can get better access [to parents] than the teachers can."

The importance of the liaisons as a communications link is emphasized throughout the district. Parents reported that if

parents have a problem at a school or with a teacher, and the parents approach a board member for assistance, they are usually told “to go to the parent liaison or the teacher.” Parents report that teachers will call parents regarding significant issues with students, but teachers often ask the liaisons to step in as the primary communicators for routine matters.

Parent liaisons have also been heavily involved in establishing active Parent Teacher Organizations (PTO) at every campus. Focus group participants report that parents are more involved in the PTO than in previous years. The organizations were previously teacher-led, and all the officers were teachers. Currently, all the district’s PTOs are parent-led. The PTOs use a number of incentives to attract parents to PTO meetings and other school functions. After some trial and error in scheduling activities for family involvement, the parent liaisons found that it was best to differentiate these incentives to parents based on the age of students.

At the elementary level, teachers communicate to students the importance of having their parents attend school functions, and, for the most part, leave it to students to persuade their parents to attend functions by using incentives. For example, the grade level with the highest rate of parental participation may be rewarded with a prize such as a movie night. Also at the elementary level, high school National Honor Society students provide tutoring and babysitting for younger children while parents attend PTO meetings. The elementary PTO actively promotes family activities, such as a family movie night with a concession stand that also functions as a fund-raising tool. The PTO also sponsors a holiday fair and a fall festival.

At the secondary level, staff reports that students are less interested in having their parents attend school events. To address this, the PTO offers door prizes, such as vouchers for local restaurants that are appealing to the parents. At the high school level, the PTO substitutes in some ways for the booster clubs which are common in many school districts to raise funds for activities such as band and athletics.

These school-community organizations have become more dynamic and effective due to the district’s parent liaisons.

Parent liaisons fill an important role in Presidio ISD, serving as a link between students, families, and schools. Liaisons encourage parents to get involved by providing a warm, familiar face at the district and by taking responsibility for communicating parental concerns. The district is commended for establishing and supporting these important positions.

COMMUNITY SERVICES

Presidio ISD offers a number of community services in the areas of education, health, and wellness.

The district partners with community agencies and organizations to provide services that benefit Presidio residents, including promoting education and a healthy lifestyle. One district teacher commented that the coordination of services is so seamless, that “we don’t even notice the overlap of community, city, and schools.”

For example, the district offers extended hours until 7 P.M. at the high school library, and pays a paraprofessional to staff the facility for community use. The elementary library is also the site for free afterschool childcare for the children of teachers. Computers that are no longer used in the district are donated to the Presidio Activity Center or the public library. GED classes, adult English classes, and computer training are available to the community through the district. The district also offers free wireless access hotspots around town for registered community participants.

Because the nearest full health facility is 60 miles away in Marfa, Presidio ISD also offers health and wellness resources for the community. School nurses provide immunizations to students through Texas Vaccines for Children, a program which offers free vaccinations for children who are enrolled in Medicaid. Supplies associated with this service, such as needles and gloves, are paid for by the district.

The district also recently invested in a program called Coordinated Approach to Child Health (CATCH), a school health program approved by the Texas Education Agency (TEA). CATCH is designed to promote physical activity and healthy food choices, and to prevent tobacco use in children. The district partners with a local health clinic to monitor students for chronic diseases. The program started in school year 2013–14, and a representative has been working with teachers on ways to “get students up and moving.” This program was chosen by the district’s School Health Advisory Council (SHAC), a legislatively mandated, board-appointed committee.

Presidio ISD is commended for its extensive work in community building.

DETAILED FINDINGS

PARENT INVOLVEMENT (REC. 54)

Presidio ISD does not have an effective process for giving parents opportunities in areas such as board meeting

participation, policy-making committees, and classroom volunteering.

While Presidio ISD has a high rate of parent attendance at district activities, numerous sources reported that a deeper level of parent involvement, such as serving in key district roles, is not available across the district. Staff reported that the same parents serve on important committees and boards such as the PTO, Campus Quality Team (CQT), and advisory committees. Advisory committees include those established to guide the district’s science, technology, engineering, and mathematics (STEM) and Early College High School (ECHS) initiatives. Parents in focus groups said: “We get a lot of parents [at PTO meetings], but helping out, being involved, it’s the same parents every time.... [Activities] that require effort, like working the concession stand or driving four hours, it’s always the same handful.” Parents and district staff reported that committees were nominated by staff, such as teachers or the superintendent’s office.

Teachers also expressed a need for parent volunteers. Staff said that parents could help fill gaps in completing tasks such as photocopying, which were previously performed by aide positions that are no longer funded by the district.

As shown in **Figure 11–1**, parent survey data indicated that respondents agreed the school board allows sufficient time for public input; that the district staff communicates with parents in a timely manner; that schools have a sufficient number of volunteers; and that district facilities are available for community use. An average of 88 parents responded to each question in either English or Spanish, and the small number of respondents may reflect the low level of parental input in important aspects of district management.

A 2002 report from Southwest Educational Development Laboratory that synthesized research on parent involvement during a 10-year period found that, regardless of family income or background, students with involved parents are more likely to:

- earn higher grades and test scores, and enroll in advanced programs;
- be promoted, pass their classes, and earn credits;
- attend school regularly;
- have better social skills, show improved behavior, and adapt well to school; and
- graduate and go on to postsecondary education.

While Presidio ISD maintains high levels of PTO attendance, a lack of a deeper level of parental involvement means that key perspectives are missing from district policy. Students may or may not receive support at home to enhance academic behavior and success. For instance, current members of the board have had tenures of up to 20 years. While long-term insight is valuable in sharing experience and a deep level of knowledge of the district, it is equally important to continue recruiting new members to include many perspectives and train future board leaders.

When key perspectives are missing from school processes, rifts can be created in the community. One recent example concerns the naming of the district’s ECHS. The board decided to name the school after William Sosa, a district graduate and benefactor. However, the issue was not clearly communicated to the community during the early stages of discussion, and the choice subsequently became a controversial issue. Because of this challenge, during the 2013 board elections, there were more candidates than

**FIGURE 11–1
PRESIDIO ISD PARENT SURVEY RESULTS
DECEMBER 2013**

STATEMENT	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE
The school board allows sufficient time for public input at meetings.	15.7% (14)	67.4% (60)	10.1% (9)	4.5% (4)	2.2% (2)
The district communicates with parents in a timely manner.	33.0% (29)	50.0% (40)	5.7% (5)	10.2% (9)	1.1% (1)
Schools have a sufficient number of volunteers to help with student and school programs.	19.3% (17)	58.0% (51)	9.1% (8)	10.2% (9)	3.4% (3)
District facilities are available for community use.	23.0% (20)	52.9% (46)	18.4% (16)	4.6% (4)	1.1% (1)

NOTE: Totals may not add to 100 percent due to rounding.
SOURCE: Legislative Budget Board, School Review Team Survey, December 2013.

normal in Presidio ISD board elections. As a result, the board still struggles to work together.

The Mexican American Legal Defense and Educational Fund (maldef.org) offers an online report called *Minority Parent and Community Engagement: Best Practices and Policy Recommendations for Closing the Gaps in Student Achievement*, which suggests some best practices for districts with large numbers of parents who belong to a minority ethnic status or who may not have attended schools in the United States. Hispanic students are not a minority in Presidio; in fact, they make up 96 percent of student enrollment. However, many of the parents or guardians of the students did not attend school in the U.S., and they may be less confident in participating in district affairs. The report suggests several strategies to increase parents' understanding of local school boards and districts. Not only can these strategies increase parent participation in board activities, but they can also be adapted and applied to committee and decision-making opportunities for parents:

- Offer a class for parents to learn about the role and function of the school district and the school board, and to demystify the process of participating in board meetings. Invite the school district superintendent or a school board member to speak with parents about the role they play in education.

- Have parent liaisons provide parents with information about school board elections.

- Offer a forum for parents where candidates running for the school board share their vision for the district, so parents and community participants can best determine who may be committed to improve the educational outcomes and experience for all students.

- Encourage parents to ask questions about the candidates' background on education and about strategies they will promote to help schools close the achievement gap for various sub-groups (ethnic minority groups, English language learners, at-risk students, special education students, etc.).

- Offer school campuses as polling locations.

- Encourage parents to attend school board meetings to help hold school board members accountable for addressing key problems.

In addition, the district can consult a variety of resources for encouraging deeper levels of parent involvement. The National Coalition for Parent Involvement in Education

(www.ncpie.org), for example, suggests a number of resources for improving parent involvement in education. These resources include books about parent-teacher partnerships, parent leadership, and community organizing from sources such as the Council of Chief State School Officers, Communities in Schools, and the Association for Supervision and Curriculum Development.

The district should expand parental involvement initiatives. The election of new board members means that some community groups have gained spokespeople on the board. The board can encourage these diverse voices to become more involved by establishing district committees. Community liaisons can be valuable conduits of information about district needs.

When the administration has cause to establish a new committee or appoint a new member to an existing committee, each board member should be asked to provide an appropriate number of names of people they feel would be an asset to the committee. If one slot needs to be filled, having board members suggest one person would be sufficient. If an entire committee needs to be established, board members may need to nominate more than one person each. If board members discuss a potential appointment with their constituencies and return with a suggested name, the district administration can work with the board and the existing committee participants (if available) to make a selection. The names of people filling slots, along with the name of the nominating board members, should be included in board minutes to provide evidence of fair selection. Parent liaisons can be a valuable source of information to board members in nominating parents who might be interested to serve on committees, and employees at local businesses should be queried about their level of interest and availability.

The district can take advantage of the high levels of participation in PTO meetings by presenting information on school governance, including the responsibilities of the board and various committees, during the meetings. Other PTO presentations could explain the process of running for the board and the importance of voting in board elections. PTOs might also consider ways of encouraging parent volunteerism, such as: inviting current volunteers to speak on what they do and what it means to them; posting short-term volunteer opportunity sign-up sheets at PTO meetings; and encouraging volunteers to bring a friend with them when they help at a school event or in the classroom.

The district could implement this practice with existing resources.

EDUCATIONAL FOUNDATION (REC. 55)

Presidio ISD does not have a way to coordinate and formalize external financial contributions for maximum effect.

The community of Presidio makes substantial contributions to the district. Benefits include financial support, partnerships, and in-kind contributions from other entities, such as city and county agencies and the Family Crisis Center of the Big Bend. In addition, the district has applied for and received a number of grants from external sources to fund specific programs, such as CATCH.

The district effectively collaborates with the community and local government to improve district services and facilities. For example, the district running track had never been paved, and the district received a previous bid to pave it for \$250,000. Recently, the city, school, and county worked together to pave it themselves for \$60,000 through an interlocal agreement in which the city and county donated equipment and labor. As another example, the Family Crisis Center of the Big Bend provided transportation and meals for a district employee to travel to receive anti-bullying training. The employee then conducted presentations at the schools to train teachers.

Districts such as Presidio ISD, which enroll high numbers of at-risk students, provide a compelling case for support. The need and community support are present, but the district is not a 501(c)(3) nonprofit, so it cannot solicit funds from foundations and other entities.

Education foundations are 501(c)(3) nonprofit corporations that have been established in many communities to address these kinds of needs. Such nonprofits can apply for grants from foundations and provide tax breaks for donors. In addition to providing ways to raise additional funds, an educational foundation provides another vehicle for community input and involvement.

In a 2002 book titled *How to Form a Nonprofit Corporation*, author Anthony Mancuso identifies several advantages of 501(c)(3) nonprofit corporations:

Groups are eligible to receive both public and private grants.

Nonprofit corporations are eligible for state and federal exemptions from payment of corporate income taxes, as well as other tax exemptions and benefits.

Incorporated nonprofit organizations have limited liability, meaning directors or trustees, officers, employees, and members of the nonprofit corporation are not personally liable for corporate debts or liabilities, including unpaid business debts and unsatisfied lawsuit judgments.

This type of foundation enables community members and businesses to provide tax-free donations for a variety of purposes related to the education of district students.

The National School Foundation Association (NSFA) offers a website (www.schoolfoundations.org) with information about planning and implementing a school foundation. Planning steps include:

- identifying the need for a foundation;
- introducing the concept in the community;
- deciding on the format;
- naming a design team; and
- developing a statement of purpose and objectives.

Implementation steps include:

- contacting the Secretary of State for necessary materials;
- choosing and submitting a name;
- preparing articles of incorporation;
- filing the articles with the Secretary of State; and
- preparing bylaws.

Additional sources of information about establishing educational foundations include the American Schools Foundation Alliance, www.asfalliance.org.

Presidio ISD should establish an educational foundation to coordinate contributions to the district.

A committee of board members should work with members of the community to establish an education foundation that benefits the district. These steps are suggested:

1. Board members each nominate 1 to 2 community/business representatives.
2. When agreement to participate is secured, committee meets to discuss the need for a foundation, decide on a plan for introducing the concept to the community, draft a statement of purpose and objectives, and decide on format of the foundation.

- 3. One committee member contacts the Secretary of State for materials.
- 4. One committee member works with attorney to organize preparing and filing articles of incorporation.
- 5. Subcommittee works with attorney to prepare draft bylaws.

The cost of implementing this recommendation would depend on the structure and legal status of the foundation that the district decides best meets its needs. The board should work with its legal consultant to investigate the best approach. No fiscal impact is assumed for this recommendation.

Since the time of the review, the superintendent informed the review team that he has supported this idea for some time and is working towards creating an education foundation.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 11: COMMUNITY INVOLVEMENT							
54. Expand parental involvement initiatives.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
55. Establish an educational foundation to coordinate contributions to the district.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 12
SAFETY AND SECURITY

PRESIDIO INDEPENDENT SCHOOL DISTRICT

CHAPTER 12. SAFETY AND SECURITY

An independent school district's safety and security function identifies vulnerabilities and includes strategies to minimize risks to ensure a protected learning environment for students and staff. This protection includes a balanced approach of prevention, intervention, enforcement, and recovery. Risks can include environmental disasters, physical hazards, security threats, emergencies, and human-caused crises.

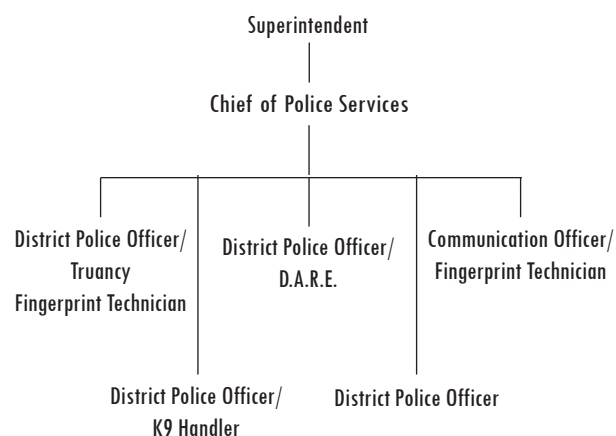
Managing safety and security initiatives is dependent on a district's organizational structure. Larger districts typically have a staff dedicated to safety and security, while smaller districts assign staff tasks as a secondary assignment. Safety and security includes ensuring the physical security of both a school and its occupants. A comprehensive approach to planning for physical security considers school locking systems; monitoring systems; equipment and asset protection; visibility of areas and grounds; police/school resource officers; and emergency operations. Emergency and disaster-related procedures must include fire protection, environmental disasters, communication systems, crisis management, and contingency planning. The identification of physical hazards must consider playground safety, and overall building and grounds safety. Environmental factors, such as indoor air quality, mold, asbestos, water management, and waste management, also affect the safety of school facilities.

One of the stated objectives of public education in the Texas Education Code (TEC) 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 at ways to identify risks and develop plans to mitigate threats.

A safe and secure school environment as defined by the U.S. Department of Education, Title IV, Section 401, 21st Century Schools and the Safe and Drug-Free Schools and Communities Act, encompasses: communication systems, fire protection, playground safety, facility safety, environmental regulations, and emergency operation planning.

Presidio Independent School District (ISD) is located in Presidio County on the United States-Mexico border. Due to its close geographic proximity to the border, which has seen recent violence associated with drug trafficking, the district has a well-staffed Presidio ISD Department of Public Safety to monitor the environment and address any risks and threats. The department includes the chief of district police services and four district police officers, who are also part-time employees of the Presidio Sheriff's Department, and a communication officer. **Figure 12-1** shows the district's organization for safety and security.

FIGURE 12-1
PRESIDIO ISD DEPARTMENT OF PUBLIC SAFETY
ORGANIZATION
SCHOOL YEAR 2013-14



SOURCE: Presidio ISD, December 2013.

The Chief of Police Services supervises the department, is responsible for writing and updating the Emergency Operations Plan (EOP), and oversees the district's safety and security function.

The duties of the four police officers include, but are not limited to:

- periodic lockdowns and evacuations;
- crossing guard duties;
- investigating crimes that occur on district property; and

- fostering a positive relationship between law enforcement and students.

One of the police officers has the additional responsibility of overseeing the K9 dog, which is used in searches for illegal drugs in school campuses, parking lots, buildings, and motor vehicles. Another officer is the Drug Abuse Resistance Education (D.A.R.E.) instructor in the school district. A third officer is assigned duties as the truancy officer and fingerprint technician. The communication officer provides clerical assistance to the department and also serves as a fingerprint technician. The district provides department staff with camera surveillance systems to monitor district facilities. Presidio ISD Department of Public Safety staff also have access to Presidio County Sheriff's Department vehicles, pursuant to a memorandum of understanding between the Presidio County Sheriff's Office, the Presidio ISD Department of Public Safety, and the Presidio Police Department. The district department chief and officers carry service weapons and tasers.

The district has in place district board policies to govern student discipline [FO (LEGAL)], truancy [FED (LEGAL)], and attendance [FEA (LEGAL)].

FINDINGS

- ◆ Presidio ISD lacks a formal process for truancy referral and reporting, which results in inaccurate Public Education Information Management System truancy data.
- ◆ Operation of Presidio ISD's visitor control procedures, video surveillance system, and firearm and ammunition regulations are inconsistent and ineffective.
- ◆ Presidio ISD's campus science laboratories lack formal practices and procedures to ensure that chemicals are stored, labeled, handled, and disposed of properly.
- ◆ Presidio ISD lacks a methodology to ensure regular completion of its safety and security audit and the district lacks proper emergency preparedness.
- ◆ Presidio ISD lacks a clearly defined local policy related to required district Department of Public Safety staff training.

RECOMMENDATIONS

- ◆ **Recommendation 56: Provide truancy management standards and training to ensure accurate Public**

Education Information Management System reporting.

- ◆ **Recommendation 57: Develop comprehensive standards, procedures, and training to guide district safety and security management.**
- ◆ **Recommendation 58: Develop a science laboratory safety system.**
- ◆ **Recommendation 59: Establish a process to conduct its safety and security audit every three years as required and ensure staff understanding of the Emergency Operation Plan.**
- ◆ **Recommendation 60: Re-draft board policy CKE (LOCAL) to clarify staff requirements for education, firearms proficiency, and taser training.**

DETAILED FINDINGS

TRUANCY DATA (REC. 56)

Presidio ISD lacks a formal process for truancy referral and reporting, which results in inaccurate Public Education Information Management System (PEIMS) truancy data.

PEIMS data consists of information requested and received by the Texas Education Agency (TEA) about public education, including student demographics; academic performance; and district personnel, financial, and organizational information. Each campus in the district enters PEIMS data independently, which is verified by the principal at each campus and then approved by the superintendent.

Figure 12–2 shows a two-year comparison of attendance data between Presidio ISD, the state average, and a group of peer districts. Peer districts are districts similar to Presidio ISD that are used for comparison purposes. The peer districts are Santa Rosa ISD, Tornillo ISD, Monte Alto ISD, and Muleshoe ISD.

As shown in **Figure 12–2**, Presidio ISD attendance was lower than all peer districts and the state average in school years 2010–11 and 2011–12.

Staff reported that campus administrators and the district's truancy officer schedule parent and student conferences for students who have attendance issues to try to reduce student absenteeism. Additionally, the district includes a written explanation of truancy laws in the Presidio ISD Student Handbook 2013–14. The handbook references the Texas

FIGURE 12-2
PRESIDIO ISD, PEER DISTRICT, AND STATE AVERAGE
ATTENDANCE COMPARISON
SCHOOL YEARS 2010-11 AND 2011-12

DISTRICT	2010-11 ATTENDANCE	2011-12 ATTENDANCE
Monte Alto ISD	96.7%	96.7%
Muleshoe ISD	96.0%	96.7%
Santa Rosa ISD	95.4%	96.0%
Tornillo ISD	95.8%	95.8%
Presidio ISD	95.0%	95.2%
State Average	95.7%	95.9%

SOURCE: Texas Education Agency, Texas Academic Performance Reports, November 2013.

Education Code (TEC), Section 25.094, which assesses a misdemeanor for failure to attend school, and Section 25.092, commonly referred to as “the 90 percent rule,” which requires students to be present for 90 percent of the days class is offered to be eligible for class credit.

A police officer in the Presidio ISD Department of Public Safety serves as the district’s truancy officer. Attendance at each campus is taken at approximately 10:00 A.M. each school day. After attendance is collected, a list of absentees is generated in the front office of each campus, and the campus parent liaison, PEIMS clerk, or assistant principal begins calling parents to notify them of the student’s absence and remind parents that a note will be needed upon return to school. If no one answers the phone call, a message is left for the parent. At this point, the student record is marked “absent” in the PEIMS system. The day after the absence, the student is required to bring a parent note or doctor note. Staff reported that doctor notes are especially scrutinized to ensure that students do not submit fraudulent doctor notes. If a parent or doctor note is received and validated, the absence is recorded on the student’s PEIMS record as “excused.” If there is no note, the absence is recorded as “unexcused.” Each campus stores doctor and parent excuse notes in student folders that can later be used for parent conferences and evidence for Justice of the Peace (JP) court truancy hearings. The superintendent’s office receives an attendance update daily as a standard practice.

Statute defines the misdemeanor for failure to attend school in TEC, Section 25.094 (a) (2), which states that a student who commits a truancy offense “fails to attend school on 10 or more days or parts of days within a six-month period in the same school year or on three or more days or parts of days

within a four-week period.” If a student fails to meet these attendance requirements, a truancy referral is issued by the principal or assistant principal via an online application to the Presidio ISD Department of Public Safety. When the truancy referral is received in the department, the truancy officer validates the campus information, such as parent and doctor notes and number of days absent. Once this information has been validated, a warning notice from the district is mailed to the student’s home or hand-delivered. Staff estimated that warning notices are issued in 99 percent of cases in which referrals are received. After the issuance of a warning notice, student absences are monitored, and continued absences result in the issuance of a citation to the parents of the student or the student.

However, there is no written district process for campus principals and assistant principals to follow in implementing truancy proceedings. Formal district practices for managing truancy such as referrals, warning notices, citations, and attendance committee meetings are unclear or not documented.

A review of the district’s truancy process found:

- the district does not have a process to verify that PEIMS truancy data is accurate. Disciplinary actions for truancy are not reflected in PEIMS data reporting. Even after truancy charges are filed for students, Presidio ISD’s PEIMS disciplinary data for truancy does not reflect these charges;
- no district process for the truancy officer to inform campus administrators of changes to the student’s PEIMS record based on court results. Campus staff reported that the schools rarely received updates on court results after a citation was issued;
- no standard practice for campus administrators to use in issuing truancy referrals, including timetables. This could result in dismissal of a truancy complaints by the JP. TEC, Section 25.0951, states that a court is required to dismiss a complaint regarding absences if the school fails to file the complaint within 10 school days of the student’s tenth absence;
- mistakes in a sample of truancy referral forms, with discrepancies in the total absences recorded and the number of excused and unexcused absences not adding up; and
- the district’s most recent PEIMS submissions for the truancy records were not consistent with the number

of truancy students. The state provides several submission windows during the year to update, validate, or correct truancy data entered into PEIMS. However, the district did not use these opportunities to ensure correct final data were submitted.

Figure 12–3 shows a summary of truancy records for Presidio ISD, including truancy referrals from campuses, JP cases, and the PEIMS Student Disciplinary Action Summary.

As **Figure 12–3** shows, truancy documentation provided by the district indicates discrepancies in the number of truancy referrals, the number of JP court cases, and the number of disciplinary actions recorded in PEIMS. In the five-year period for which documents were provided, there were 181 campus referrals. Assuming a 99 percent rate of converting referrals to warning notices, approximately 179 warning notices were issued. The JP has documented 131 truancy cases. Of these cases, less than five had their results recorded in PEIMS. Districts are expected to file information for yearlong attendance; course completions; disciplinary actions; participation in Title I, Part A (grant funding for low-income school districts); course sections; teacher class assignments; and staff data. Based on the data analyzed and the information on file for the district, there is no reconciliation of the PEIMS records.

The PEIMS Data Standards manual for school year 2013–14 identifies these procedures for reporting truancy actions on the 425 discipline record (“425 record” refers to the PEIMS code corresponding to truancy data):

- if a student withdraws from the district or is withdrawn by the district after truancy charges are filed and the court during the same school year issues

a finding of truancy, then the district is to report a 425 record using the date of withdrawal as the date of disciplinary action;

- if a court hearing does not occur until the summer following the school year in which the truancy charges are filed, a 425 record for truancy (if there is a finding of truancy by the court) will be reported the following school year (if the student re-enrolls in the district the following year) with the DATE-OF-DISCIPLINARY-ACTION being the first day of school;
- in cases where the school district files truancy proceedings against the parent(s) and the student for the same event, if the court makes a finding (disposition/order) against the parent and student, a 425 record is required for the student;
- districts have the option of reporting both parent(s) and student truancy findings but must report the student and must use two different incident numbers. If truancy is only found against the parent and not the student, then a 425 record must be reported on the findings against the parent(s); and
- finding or filing of truancy charges does not constitute a disciplinary assignment. Any action by the district requiring removal from the regular classroom for truancy must be documented in the district’s student code of conduct pursuant to TEC, Section 37.001.

These consequences for a school not reporting its discipline events through the PEIMS 425 record are included in the PEIMS Data Standards manual:

FIGURE 12–3
PRESIDIO ISD TRUANCY DOCUMENTATION
SCHOOL YEARS 2009–10 TO 2013–14

SCHOOL YEAR	TOTAL NUMBER OF REFERRALS	FILED JP CASES	PEIMS TRUANCY CASES RECORDED	PEIMS DISCIPLINARY ACTION RECORDED
2009–10	No documents provided	27	0	None
2010–11	No documents provided	53	0	None
2011–12	106	31	* (2)	Fine was assessed
2012–13	62	6	0	None
2013–14 (1)	13	14	0	None
TOTAL	181	131	N/A	

NOTES:

(1) As of November 2013.

(2) Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA), 34 CFR Part 99.1, and Texas Education Agency procedure, OP10-03.

SOURCE: Presidio ISD, Department of Public Safety and Business Office; Presidio County, Justice of the Peace Precinct 2; December 2013.

“Under TEC 37.008(m-1), failure to report all disciplinary removals and truancy actions as required by state and federal law may result in a review by the commissioner of education and notice to the local school board of any problems noted in the district’s data, or a violation of a law or other rule. This review may also result in a notification to the county attorney, district attorney, criminal district attorney, as appropriate, and the attorney general. This provision can apply to missing, inaccurate, and/or falsified information/data.”

Districts that develop consistent standards across campuses help to ensure equal application to all students and minimize the potential of court-dismissed complaints. A tracking process to monitor truancy management provides a reminder to principals and campus staff to follow up on the progress of referrals and warning notices.

Presidio ISD should provide truancy management standards and training to ensure accurate PEIMS reporting. As part of this process, the district should develop standard practices for truancy referral that meet the TEC, Section 25.094, guidelines for reporting failure to attend school.

To ensure proper PEIMS accounting for truancy issues, the district should establish a checklist of procedures aligned to the steps in the truancy process that provide guidance for entering and updating actions in PEIMS using appropriate coding. If a student is found to be truant, the student’s 425 record should show a Disciplinary Action Reason Code and a Disciplinary Action Code. **Figure 12–4** shows descriptions of Disciplinary Action Reason Codes.

**FIGURE 12–4
DISCIPLINARY ACTION REASON CODES
SCHOOL YEAR 2013–14**

CODE	DESCRIPTION
42	Truancy (failure to attend school) – Parent contributing to truancy – TEC, Section 25.093(a)
43	Truancy (failure to attend school) – Student with at least three unexcused absences – TEC, Section 25.094
44	Truancy (failure to attend school) – Student with 10 unexcused absences – TEC, Section 25.094
45	Truancy (failure to attend school) – Student failure to enroll in school – TEC, Section 25.085

SOURCE: Texas Education Agency, PEIMS Data Standards – Appendix E, November 2013.

Figure 12–5 shows Disciplinary Action Code descriptions.

The campus principals should develop training for staff and establish monitoring processes to ensure that the information included on initial truancy referrals is correct. The district should also take steps to ensure that truancy information is properly recorded or corrected in PEIMS.

**FIGURE 12–5
DISCIPLINARY ACTION CODES
SCHOOL YEAR 2013–14**

CODE	DESCRIPTION
16	Truancy (failure to attend school) – charges filed in Juvenile Municipal or Justice of the Peace court, and a fine was assessed
17	Truancy (failure to attend school) – charges filed in Juvenile Municipal or Justice of the Peace court, and no file was assessed

SOURCE: Texas Education Agency, PEIMS Data Standards – Appendix E, November 2013.

Verification processes should be implemented to verify attendance and truancy data at the campus level before PEIMS data is submitted. The campus principal is responsible for PEIMS campus validation, and the superintendent is ultimately responsible before the final submission of PEIMS to TEA.

This recommendation could be implemented with existing resources.

STANDARDS AND PROCEDURES (REC. 57)

Operation of Presidio ISD's visitor control procedures, video surveillance system, and firearm and ammunition regulations are inconsistent and ineffective.

Staff reported that the policy guiding department practices are included in board Policy CKE (LOCAL) Safety Program/Risk Management: Security Personnel/Peace Officers which includes:

- carrying of firearms—district peace officers are encouraged to carry their firearm at all times but must carry their firearm when on duty, performing an official act or function as a police officer for the district. Security personnel may not carry firearms unless permitted by the chief only according to certain, restricted, justifiable circumstances, and they are licensed by the state as peace officers; and
- service weapons—all peace officers shall furnish and carry their own service weapon, which shall be any of these calibers: revolver (.38 special); semi-automatic (.40, .45 and 9mm); and compatible police belt and holster, to be approved by and registered with the chief of police with respect to make, model, caliber, serial number, and ammunition. Only that ammunition approved by and registered with the chief of police shall be placed in the service weapon or carried by the district peace officer while on duty. Officers shall utilize the utmost caution when carrying, using, or storing weapons to ensure no person is accidentally injured. Any weapons carried by any officer shall be clean, safe, and functional. The chief of police may inspect the weapon carried by any officer to ensure compliance with this requirement at any time.

No other written documented standards exist to guide department safety and security staff in implementing standardized practices.

Campus visitor control procedures are inconsistent and lax. Presidio ISD maintains a closed campus environment, which means that students are not allowed off campus during the lunch hour. According to staff, there exists an unwritten practice of locking all exterior campus doors during the school day with the exception of the main campus entrance. However, review team members found evidence that not all doors are locked at all times. Further, even though campuses have on-site police officers, it appears that visitor verification processes are not in place. During the review team site work in December 2013, team members entered the Franco

Middle School campus from exterior doors and were never questioned by campus staff or noticed by the on-site police officer. It is important that schools be aware of visitors to the campus, have visitor controls in place, and question anyone who does not have a visitor or district identification badge.

The district's video surveillance system is not functioning properly or used to its full benefit. The district has placed 121 video cameras throughout its facilities to provide video surveillance, which is backed up daily with server capacity of approximately a 10-day rewrite process. The video cameras appear to be in working condition, with the exception of a camera in the elementary school cafeteria that was hanging in place. However, department staff does not appear to have been trained to use the equipment. When police officers were asked to demonstrate monitoring of the middle school outside area, they were unable to operate the system, whether from lack of practice or training. This valuable security system should be used to monitor the halls to see students coming and going. With outside cameras, officers should monitor the children to make sure there are no injuries on the playground. Officers also should monitor those around the schoolyard to prevent a dangerous situation. For example, if an officer sees someone standing by a fence, or someone talking to a student, the officer can approach and assess the situation. Additionally, security cameras can keep school vandalism to a minimum.

Firearms regulations and ammunition control procedures are undocumented. School district policy CKE (LOCAL) allows district police officers to carry loaded firearms on district property and specifies the caliber of service weapons. District police officers have duties outside the school district, and their external duties might require the use of rifles capable of firing .223 round ammunition and/or the use of an assault rifle. Officers may also carry these weapons when they are working in the district, so awareness of onsite firearms regulations is critical. The matter of tracking the contents of a purchase order of ammunition is vitally important. In September 2012, a purchase order containing various caliber sizes of ammunition was entered in the school district:

- .45 caliber ammunition
- .40 caliber ammunition
- .223 caliber ammunition
- 9mm ammunition
- .223 Tactical Application for Police (TAP) ammunition

This ammunition purchase confirms that weapons that are not addressed in policy are being carried on campus or that there is fraud. Additionally, interviews with district staff indicated that there are no written sign-in or sign-out sheets for ammunition; it is “just handed out,” with surplus stored in a locked cabinet. These examples indicate significant gaps in district departmental firearms regulations.

United ISD in Laredo has compiled a detailed Police Department Policy Manual that is used to provide direction in a clear manner to the police officers on staff. The operations manual details chain of command, expandable baton use, student discipline, firearms and related equipment, off-duty employment, radio operations, and other important duty-related activities. United ISD also details the standard duty weapons the district issues, and the included ammunition. No other ammunition is authorized nor permitted to be used.

In 2004, Galena Park ISD in Houston developed a comprehensive safety program to increase awareness and reduce the risk of unauthorized persons on district property. The district developed a comprehensive districtwide program to secure its schools from unauthorized visitors, designating one open and monitored campus entrance near the main office and within view of the receptionist and office workers. All buildings were affixed with signs clearly directing visitors to the office. Campuses issue visitor tags or building passes, and visitors are signed out when leaving the facility or grounds. Staff members are trained to identify appropriate visitor passes and to escort people who do not have them to the front office. Uniforms identify students at the elementary and middle schools, and teachers wear or carry photo identification cards. Auxiliary staff such as maintenance staff also wear district uniforms, and employee vehicles require parking-lot tags.

Presidio ISD should develop comprehensive standards, procedures, and training to guide district safety and security management.

To support the development of these documented guidelines, the district can identify members to serve as the district’s safety team. The team could meet monthly or as needed to complete these activities:

- research and review resources for examples of applicable policy and procedures;
- draft and update policies and procedures;
- conduct safety inspections and audits;

- monitor the status of safety issues;
- publish a safety newsletter and develop and implement necessary training; and
- present periodically to the school board.

Access control and visitor management at all campuses should begin with the development of a safety and security document. This document should be reviewed and updated at the beginning of each school year. Access and visitor management are fundamental to establishing a safe environment.

To support effective use of the video surveillance system, the team could implement schedules and procedures to focus on:

- training in navigating and functional use of the surveillance system for district police officers;
- training for additional district staff, such as those in the Maintenance Department and other departments that have desktop monitoring capabilities and mobile devices; and
- written daily monitoring procedures and responsibilities for security camera and surveillance system video documentation.

Written procedures should be developed to order, receive, store, and distribute ammunition purchased by the district. As ammunition is requested by staff, it should be documented; when rounds are expended, they should be noted in a log. When ammunition is used for proficiency training, a qualifying certificate should be presented and placed in the officer’s file.

Presidio ISD uses Policy On Line by the Texas Association of School Boards (TASB). TASB provides policy-drafting guidance and general samples that are aligned with best practice and state and federal law. School districts can use this service to develop district-specific policies that provide the framework for daily operations. The district can use board policies CKE (LOCAL) and CKE (LEGAL) as the foundation to then write procedures and practices.

This recommendation could be implemented with existing resources.

LAB SAFETY (REC. 58)

Presidio ISD’s campus science laboratories lack formal practices and procedures to ensure that chemicals are stored, labeled, handled, and disposed of properly.

During visits to the science laboratories at the district's middle and high school campuses, the school review team found:

- unlocked doors to the chemical room area;
- unlocked metal chemical storage cabinets;
- unreadable labels on chemicals;
- unavailable inventory of chemicals, including quantities and dates inventory was received/opened;
- unclear processes for disposal of chemicals;
- undocumented storage protocols for equipment and chemicals; and
- ineffective safety equipment (shower and eye wash area did not have a drain).

The lack of proper oversight of the chemistry lab and the inventory of chemicals presents significant safety and security risks for the district, district students, and the community. These risks include dangerous misuse or mishandling of chemicals, and the potential risk that district-purchased chemicals could be lost or stolen.

The U.S. Consumer Product Safety Commission in conjunction with the U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, and the National Institute for Occupational Safety and Health published the *School Chemistry Laboratory Safety Guide* in October 2006. The guide was developed to provide high school chemistry teachers with an easy-to-read reference for establishing a safe learning environment in the laboratory. The guide details appropriate precautionary measures to prevent or minimize hazards, harmful exposures, and injuries in the laboratory, and addresses best practices in these areas:

- teacher responsibilities;
- safety guidelines for students;
- chemical hygiene;
- material safety;
- chemical purchasing considerations;
- chemical tracking systems;
- container labeling;
- chemical-specific storage, maintenance, and handling (e.g., inorganics, organics, compressed gas);
- strategies to reduce toxic/chemical waste; and

- disposal.

These resources are available at no cost.

Presidio ISD should develop a science laboratory safety system. The district should use available best practice guidelines to develop detailed but easy-to-use instructions for laboratory safety that include processes to order and purchase, store, handle, maintain, and dispose of chemicals used in the middle and high school science laboratories. These documents should provide information about chemical waste; proper disposal procedures; safety and emergency equipment; chemical hazards; common safety symbols and signs; and required resources relating to chemical safety, such as material safety data sheets and chemical hygiene plans. A team headed by the middle and high school principals, classroom chemistry instructors, and a representative from the Presidio ISD Department of Public Safety should develop the document. This districtwide campus guide should then be reviewed by administration and disseminated as needed.

Immediate required actions include:

- locking the doors to the chemical room area and storage cabinets;
- conducting a complete and accurate inventory of existing chemicals, and labeling chemicals and materials appropriately;
- conducting a maintenance review of facilities and equipment; and
- installing a drainage system in the chemistry lab shower and eye wash areas.

Developing laboratory safety procedures, inventorying existing chemicals, and conducting a maintenance review could be implemented with existing resources. The district can purchase portable drains or portable mats to install at each of the three district science laboratories for approximately \$500, for a total one-time cost of \$1,500 (\$500 x 3).

EMERGENCY OPERATIONS PLAN (REC. 59)

Presidio ISD lacks a methodology to ensure regular completion of its safety and security audit and the district lacks proper emergency preparedness.

TEC, Section 37.108, requires each school district to adopt and implement a multi-hazard emergency operations plan (EOP). The plan must address mitigation, preparedness, response, and recovery, and must provide for:

- implementation of a safety and security audit;

- district employee training in responding to an emergency;
- mandatory school drills and exercises to prepare district students and employees for responding to an emergency; and
- measures to ensure coordination with the Department of State Health Services and local emergency management agencies, law enforcement, health departments, and fire departments in the event of an emergency.

The current three-year safety and security audit cycle is entering its final year. State statute requires audits to be completed by August 31, 2014, and results are required to be submitted to the Texas School Safety Center (TxSSC) not later than September 15, 2014.

During the onsite visit, the school review team found that the school district facilities school safety and security audit dated June/July 2011 was not complete, and a District Audit Report (DAR) was not available. Further, Presidio ISD's school safety and security audit is in the original template format, with little site-specific information provided on assessment and risk factors. A review of school board agendas and minutes through December 2011 do not indicate a presentation of the safety and security audit or the superintendent's written DAR.

Data collected by the school review team also indicated these safety and security issues:

- though the EOP has been updated several times since 2007, interview data indicated that district staff were not familiar with the EOP, could not recall being trained on procedures, and did not have an understanding of their role in the EOP process;
- evacuation plans were not posted in classrooms, hallways, and offices;
- evidence of training in the use of fire extinguishers was not available. District fire extinguishers have been tested and updated as of October 2013, but training is not documented;
- evidence that personnel were trained in first aid, cardiopulmonary resuscitation (CPR), and the use of the automated external defibrillator (AED) was missing or vague. Staff members in the Presidio ISD Department of Public Safety reported they had training, but specifics were not available. Review of

department continuing education certificates did not indicate recent training in these important safety areas; and

- campuses have not met recommendations for drill frequency or followed established procedures during some drills.

Presidio ISD has most EOP-related procedures and components in place, but the district lacks training and other information dissemination strategies to ensure staff have the knowledge to respond in a timely and appropriate manner to a crisis. For example, the Presidio ISD Department of Public Safety has prepared a training document called the Emergency Response Checklist, but has not trained staff in the items cited on the checklist. The checklist describes emergency and crisis prevention, and provides management and resolution guidelines. The checklist provides guidelines for accidents on campus, bus and auto accidents on trips, bullying, bomb threats, chemical spills, child abuse, kidnapping, death at school, fire, large group crisis, hazardous materials crisis, riots, security breach, vandalism, and natural disasters.

Each school district is required to make available at least one AED at each campus as defined by the Texas Health and Safety Code, Section 779.001. An AED must be readily available during any University Interscholastic League (UIL) competition held on the campus. Districts must also make all reasonable efforts to ensure that an AED is available at each UIL athletic practice held at a district campus. At least one district employee who has been trained in the use of the AED must be present at each UIL athletic competition or practice. State statute requires that each school district shall annually make available to district employees and volunteers instruction in the principles and techniques of CPR and the use of an AED. According to the statute, these staff members must participate in the instruction in the use of an AED and must receive and maintain certification in the use of an AED from the American Heart Association, the American Red Cross, or a similar nationally recognized association: school nurse and assistant school nurse; athletic coach or sponsor; physical education instructor; marching band director; drill team director; cheerleading coach; and student athletic trainers. Documented training and evidence that the district is complying with these efforts was not made available.

Data indicate that the district has conducted some of the mandatory emergency-related school drills and exercises and established plans for coordinated efforts with local emergency agencies, but the district has not met recommendations for

drill frequency or followed established procedures during some drills. The district has a memorandum of understanding in place with the Presidio County Sheriff's Office and the Presidio Police Department, and staff from these agencies participate in EOP preparedness drills when requested. **Figure 12–6** shows a summary of preparedness drills each campus has participated in from September 2012 to November 2013. Drill types include:

- fire drills – evacuation of a building in case of fire;
- lockdowns – ordered when a dangerous person is on or near a campus; doors are locked and blinds are closed;
- severe weather – refers to any dangerous weather conditions that can cause damage or loss of human life;
- shelter in place – rather than evacuate a building due to a hazardous material release or other event, students are allowed to move around inside the classroom; and
- reverse evacuation – implemented when conditions inside the building are safer than outside.

The Preparedness Drill Documentation Form is a form offered by the Texas School Safety Center that details types of drills and the recommended frequency of the drills. Presidio ISD uses this form to track drills conducted at its campuses; however, comparison with data in **Figure 12–6** shows that the district is not meeting the recommended frequency for all drills in some of these areas:

- fire drills — at least once per month when school is in session, with at least one with an obstructed exit;
- lockdown drills — two per year;
- severe weather drills — two per year;
- shelter in place drills — two per year; and
- reverse evacuation drills — two per year.

The review team found that staff comments for corrective measures from documented Preparedness Drill forms included these observations:

- failure to establish communication with Presidio ISD Department of Public Safety Office before and during lockdown;
- campus personnel should have been out of sight but were visible at the time of the drill;
- students in restroom and walking through halls at the time of the drill;
- maintenance vehicle obstructed fire department entry way; and
- doors in cafeteria were left open.

This data indicates that district staff lacks an understanding of EOP procedures and potentially may not respond appropriately in an actual emergency situation.

TxSSC states that conducting comprehensive audits “will assist districts in providing a safe and secure environment for students and staff. Safety and security is an ongoing operation and should not be thought of as an activity that occurs only once every three years.” Districts must develop safety procedures for staff and students to follow in responding to a medical emergency, which includes cardiac arrest, including administering CPR, and the use of an AED.

In 2007, the Office of the United States Attorney General issued the *School Safety Guide*, which contained steps for enhancing school safety, as shown in **Figure 12–7**.

Presidio ISD should establish a process to conduct its safety and security audit every three years as required and ensure staff understanding of the EOP.

To support this, Presidio ISD should require staff EOP training and disseminate the Emergency Response Checklist and other key documents to ensure that district staff are fully

FIGURE 12–6
PRESIDIO ISD PREPAREDNESS DRILL DOCUMENTATION SUMMARY
SEPTEMBER 2012 TO NOVEMBER 2013

CAMPUS	FIRE DRILLS	LOCK DOWNS	SEVERE WEATHER	SHELTER IN PLACE	REVERSE EVACUATION
Elementary	9	2	0	0	0
Middle School	9	2	0	0	0
High School	10	2	0	0	0

SOURCE: Presidio ISD, Department of Public Safety, December 2013.

aware of EOP protocols. To support staff awareness of EOPs, the department should conduct these activities:

- establish and post campus maps from floor diagrams with arrows that designate exit routes, assembly points, and equipment (such as fire extinguishers, first aid kits, and spill kits) that may be needed in an emergency. Exit routes should always be clearly marked and free of debris. Specific accommodations for individuals with disabilities or those who do not speak English should be made when designing maps and plans. The district has digital campus site drawings available in the Maintenance Department that could easily be printed in multiples, marked, and placed in all classrooms, offices, and ancillary rooms (cafeteria, gym, restrooms, etc.);
- perform fire extinguisher exercises throughout the school year to demonstrate their proper use. These exercises can be performed by district staff who have received training and then provide an in-service demonstration. Staff who receive training should be

provided with documentation, and a sign-in sheet should be available;

- document and ensure that qualified individuals are trained in first aid, CPR, and AED. An updated list of trained and certified staff should be readily available at all district facilities. Furthermore, the district could conduct a survey to inventory staff skills related to needs associated with the Emergency Response Checklist, including levels of proficiency in first aid, CPR, and AED. Encouraging staff members and parent volunteers to become certified in these areas would be an added value to the district. The Red Cross offers one-day classes for a combined first aid, CPR, and AED course at \$90 per person. To ensure that the district has adequate coverage, it is recommended that 10 district staff attend a training class. Classes can be arranged for on-site presentations. (10 staff x \$90 = \$900) A master list of those who are certified in first aid, CPR, and AED should be an addendum to the EOP;

FIGURE 12-7
U.S. ATTORNEY GENERAL'S OFFICE RECOMMENDED STEPS FOR DEVELOPING SAFER SCHOOLS

RECOMMENDATION	RATIONALE
Include safety in the district's mission statement	Mission statements that support the goal of safe and drug-free schools prioritize the work of safety and security staff.
Establish individual safe-school plans	Safety needs for an elementary campus can be different from the safety needs of other schools, such as an alternative high school campus, for example.
Publicize disciplinary codes of conduct	In Texas, a school's board of trustees is required to adopt a student code of conduct, which must be prominently posted at each school campus or made available in the principal's office.
Develop written agreements with other youth-serving agencies	It is important to establish and coordinate safety and security activities with law enforcement officials; presiding juvenile court judges; and social, health, and welfare agencies.
Establish crisis-management policies that include staff training	Each school and district needs a workable crisis-management plan that involves staff, students, parents, law enforcement officials, community emergency services, and the media.
Conduct annual school-safety site assessments	Safety audits and regular campus inspections promote awareness and accountability for safety and security concerns.
Exercise full custodial responsibility	School board members have a fiduciary and custodial interest in ensuring that district assets remain intact for future children coming through the system. This is the basis for developing policies about what is and is not allowed on district property.
Share information among schools and staff members about dangerous conditions or individuals with behavioral issues	Texas law requires that district officials are informed when students who have a history of violence are enrolled in their schools.
Screen new employees	Background checks and records screening of all district staff, regular visitors, or volunteers should be required as appropriate.
Evaluate employees and remove those who pose a risk to children	School boards should develop a system to recognize and deal with staff who are arrested for criminal offenses.

SOURCE: National School Safety Center, School Safety Handbook, 2007.

- ensure and document that EOP training is provided annually, and that all new staff members are familiar with their responsibilities. Training documentation that contains a school inspection checklist would assist in addressing safety and security updates. The inspection checklist outlines access control, surveillance camera needs, exterior fencing, and communication inside and outside the district. A checklist could be used as a monthly inspection document for campus principals and safety and security staff. Maintaining the recommended drill type frequencies and updating the EOP document annually will support preparedness. According to Board Policy CKC (LOCAL), the superintendent is responsible for ensuring that the district EOP is updated and staff training is ongoing; and
- schedule and perform a safety and security audit yearly. The audit provides a review of the physical conditions of each facility, ensures current documentation, and assesses visitor management. School audits are sent to the superintendent, who then prepares the formal written DAR that is presented to the school board. Each campus principal should submit the School Safety and Security Audit Report to the superintendent during the academic year in which the audit was conducted, along with any actions the campus has taken to mitigate negative findings. The superintendent should then draft the official report of the district's audit and submit it to the board of trustees, in accordance with TEC, Section 37.108(b).

The district could implement components of this recommendation with existing resources, with the exception of the cost for first aid, CPR, and AED combined course training. The training cost is \$900 per year, and it should be replicated every other year for a five-year total of \$2,700 ($\$900 \times 3 = \$2,700$). The Presidio ISD Department of Public Safety should maintain all safety training documentation for the district and have the information readily available.

CONTINUING EDUCATION AND FIREARM TRAINING (REC. 60)

Presidio ISD lacks a clearly defined local policy related to required district Department of Public Safety staff training.

Presidio ISD's current Board Policy CKE (LOCAL) defines police officer continuing education requirements and firearm training broadly: "All District officers shall receive at least 40 hours of continuing education and firearms training each

year." Board Policy CKE (LEGAL) states, "If the District employs peace officers, it shall provide each officer with a continuing education program as required by Occupations Code Title 10, Chapter 1701, Subchapter H." This state statute requires 40 hours of training every 24 months and does not specify what kinds of training are required.

Though the district has a local policy that requires training for the safety program and security personnel, it is vague and lacks specific requirements for how much of each type of training is required per year. In addition, the policy limits the required 40 hours of continuing education to that approved by Texas Commission on Law Enforcement Officer Standards and Education (TCLEOSE) and does not include school-related staff development. Finally, policy CKE (LOCAL) does not mention the required training in the use of tasers. Taser training certificates are only valid for one year and should be updated yearly.

A review of department continuing education documentation and certificates is shown in **Figure 12-8** and **Figure 12-9** for school years 2012-13 and 2013-14.

As **Figure 12-8** shows, one of the department staff received no training during school year 2012-13. Additionally, there is no evidence that any officers in the department had any firearms proficiency training.

Figure 12-9 shows the documented officer training from August 2013 to December 2013.

As shown in **Figure 12-8** and **Figure 12-9**, while no taser training was indicated in school year 2012-13, staff members have completed taser training, which is valid for a one-year period, for school year 2013-14. None of the district's police officers have documented firearms proficiency training on file for school year 2012-13 or in the first six months of school year 2013-14. The Texas Department of Public Safety offers courses in a range of school-related training for school safety officers. These include training on topics such as child abduction investigative strategies, general hazardous materials, interdiction for the protection of children, Internet and technology-facilitated sexual exploitation of children, perpetrators of sexual crimes against children, and public safety communications. Regional Education Service Center XVIII (Region 18) also provides staff development for safety officers who work with students with special needs, violent crisis prevention intervention, school safety services, and truancy updates. The TXSSC offers additional school district-related offerings throughout the year, such as Texas School-Based Law Enforcement Conference, School-Based

FIGURE 12-8
PRESIDIO ISD DEPARTMENT OF PUBLIC SAFETY CONTINUING EDUCATION SUMMARY
AUGUST 1, 2012 TO AUGUST 1, 2013

OFFICER	COURSE DESCRIPTION	CONTINUING	DATE	MET 40-HOUR REQUIREMENT	FIREARMS COMPLIANCE
		EDUCATION		2012-13	
		HOURS			
1.	Legal Update	4	March 14, 2013	Yes	None documented
	New Chief Development	40	June 24-28, 2013		
	TCLEOSE Basic Instructor Course Number 1014 (1)	40	July 10, 2013		
2.	Law Enforcement Conference (2)	40	June 23-27, 2013	Not officially on staff at beginning of school year	Not officially on staff at beginning of school year
3.	Drug Abuse Resistance Education	80+	September 9-21, 2012	Yes	None documented
	TCIC/NCIC Policy and Procedure (1)	8	October 20, 2012		
	Enforcing Tobacco Laws in Texas	4	November 30, 2012		
	Shelter Fundamentals	8	March 29, 2013		
	Drug Abuse Resistance Education	32+	July 16-18, 2013		
4.	Advanced Human Trafficking	4	March 7, 2013	Not officially on staff at beginning of school year	Not officially on staff at beginning of school year
	Legal Update	4	March 14, 2013		
	Criminal Investigation and Criminal Scene	8	June 19, 2013		
5.	Tactical Training	8	December 11, 2013	Yes	None documented
	Legal Update	4	March 14, 2013		
	TCIC (1)	8	May 22, 2013		
	TLETS Mobile (1)	8	May 22, 2013		
	Criminal Investigation and Criminal Scene	8	June 19, 2013		
	Basic Instructor Course	40	July 10, 2013		
6.	No Identified Courses	0		Non-compliant	Not required (communication officers; does not use a firearm)

NOTES:

(1) TCLEOSE – Texas Commission on Law Enforcement Officer Standards and Education; TCIC – Texas Crime Information Center; NCIC – National Crime Information Center; TLETS – Texas Law Enforcement Telecommunications System.

(2) Five-day conference = 40 hours.

SOURCE: Presidio ISD, Department of Public Safety training records, December 2013.

**FIGURE 12–9
PRESIDIO ISD DEPARTMENT OF PUBLIC SAFETY CONTINUING EDUCATION SUMMARY
AUGUST 1, 2013 TO AUGUST 1, 2014**

OFFICER	COURSE DESCRIPTION	CONTINUING EDUCATION HOURS	DATE	MET 40-HOUR REQUIREMENT 2013–14	FIREARMS COMPLIANCE
1.	TCLEOSE Basic Instructor Course Number 1014 (1)	40	August 10, 2013	Yes	None documented
	Taser Training Academy (2)	16	August 21, 2013		
2.	Taser Training Academy (2)	16	August 21, 2013	No, as of December 2013	None documented
3.	TCLEOSE Basic Instructor Course Number 1014 (1)	40	August 10, 2013	Yes	None documented
	Taser Training Academy (2)	16	August 21, 2013		
4.	Taser Training Academy (2)	16	August 21, 2012	No, as of December 2013	None documented
5.	TCLEOSE Basic Instructor Course Number 1014 (1)	40	August 10, 2013	Yes	None documented
	Taser Training Academy (2)	16	August 21, 2013		
6.	No Identified Courses	0		No, as of December 2013	Not required

NOTES:

(1) TCLEOSE – Texas Commission on Law Enforcement Officer Standards and Education.

(2) Normally a two-day course = 16 hours.

SOURCE: Presidio ISD, Department of Public Safety training records, December 2013.

Law Enforcement Summits, and Texas Bully Prevention Summit.

Presidio ISD should re-draft board Policy CKE (LOCAL) to clarify staff requirements for education, firearms proficiency, and taser training.

The district’s board Policy CKE (LOCAL) should be rewritten to clearly define annual officer training requirements. Policy could be changed to:

- define a training year as an academic school year;
- require 40 hours of training split between continuing education and school-related staff development;
- define firearms and taser proficiency as separate annual training requirements;
- require a minimum of 8 hours of firearms training each school year; and
- require a minimum of 8 hours of taser training each school year.

Policy language that clearly defines continuing education and firearm training might include:

- OFFICER TRAINING—All district police officers shall receive at least 40 hours of training per year that is divided between approved TCLEOSE continuing

education and school-related staff development during the school year. All district officers will be required at least 8 hours of firearms proficiency training each school year. All district officers will be required at least 8 hours of taser training each school year.

- TCLEOSE is defined as approved training that shall include topics such as civil rights, racial sensitivity, cultural diversity and recognition of cases that involve child abuse, child neglect, family violence, and sexual assault.
- Staff development is defined as including surveillance system updates/proficiency training, truancy updates, EOP updates, working with students with disabilities, and other school district safety-related issues.

The district can track staff training by using a format similar to the figures above. Certificates for continuing education, staff development, and firearm proficiency must be documented and kept on record.

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	2014-15	2015-16	2016-17	2017-18	2018-19	TOTAL	ONE TIME
						(COSTS) OR SAVINGS	(COSTS) OR SAVINGS
CHAPTER 12: SAFETY AND SECURITY							
56. Provide truancy management standards and training to ensure accurate Public Education Information Management System reporting.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
57. Develop comprehensive standards, procedures, and training to guide district safety and security management.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
58. Develop a science laboratory safety system.	\$0	\$0	\$0	\$0	\$0	\$0	(\$1,500)
59. Establish a process to conduct its safety and security audit every three years as required and ensure staff understanding of the EOP.	(\$900)	\$0	(\$900)	\$0	(\$900)	(\$2,700)	\$0
60. Re-draft board policy CKE (LOCAL) to clarify staff requirements for education, firearms proficiency, and taser training.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	(\$900)	\$0	(\$900)	\$0	(\$900)	(\$2,700)	(\$1,500)

