LEGISLATIVE BUDGET BOARD

West Orange-Cove Consolidated Independent School District

Management and Performance Review

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Consolidated Independent School District

Management and Performance Review

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Decmber 8, 2023

Dr. Rickie Harris
Superintendent
West Orange-Cove Consolidated Independent School District

Dear Dr. Harris:

The attached report reviews the management and performance of West Orange-Cove Consolidated Independent School District's (CISD) educational, financial, and operational functions.

The report's recommendations will help West Orange-Cove CISD 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 West Orange-Cove CISD.

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

The report is available on the LBB website at http://www.lbb.texas.gov.

Respectfully submitted,
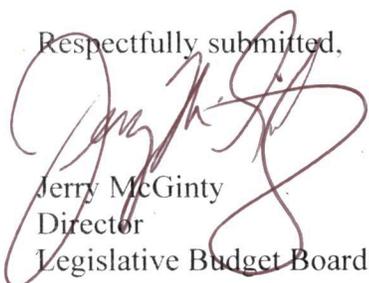
Jerry McGinty
Director
Legislative Budget Board

cc: Linda Platt-Bryant   Gina Yeaman
      Tricia Stroud   Roderick Robertson
      Demetrious Hunter   Donny Teate Jr.
                                  Tommy Wilson Sr.

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EXECUTIVE SUMMARY

LEGISLATIVE BUDGET BOARD SCHOOL PERFORMANCE REVIEW BACKGROUND

The Legislative Budget Board's School Performance Review Team conducts comprehensive and targeted reviews of school districts' and charter schools' educational, financial, and operational services and programs. The Texas Legislature established the team in 1990. The Texas Government Code, Section 322.016, authorizes the Legislative Budget Board (LBB) to "periodically review the effectiveness and efficiency of the operations of school districts, including the district's expenditures for its officers' and employees' travel services."

The review team produces reports that identify accomplishments, findings, and recommendations based upon the analysis of data and onsite observations of each district's operations. The report recommends ways to decrease costs, increase revenues, reduce overhead, streamline operations, and improve the delivery of educational, financial, and operational services. School districts typically are selected for management and performance reviews based on a risk analysis of multiple educational and financial indicators.

To gain an understanding of the school district's operations before conducting the onsite visit, the review team requests data from the district and multiple state agencies, including the Texas Education Agency (TEA), the Texas Department of Agriculture, and the Texas School Safety Center. For the West Orange-Cove Consolidated Independent School District (WOCCISD) review, the LBB school performance review team implemented additional methods for obtaining feedback on district operations, including surveys of parents and district and campus staff. While onsite, the review team gathered information through multiple interviews and observations with district and campus administrators, staff, and members of the Board of Trustees.

WEST ORANGE-COVE CONSOLIDATED INDEPENDENT SCHOOL DISTRICT

The School Performance Review Team conducted an onsite review of the WOCCISD in October 2022.

The review team identified 19 findings and 20 observations in three major categories. These findings and observations were based upon the analysis of data and the onsite observation of the district's educational, financial, and operational services and programs. Some of the recommendations are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards or accepted best practices, and the district should review these recommendations to determine the level of priority, appropriate timeline, and method of implementation.

WOCCISD is located in Orange County, approximately 112 miles northeast of Houston. The district is served by regional Education Service Center V (Region 5). The state legislators for the district are Senator Robert Nichols and House of Representatives Speaker Dade Phelan.

During school year 2021–22, WOCCISD's enrollment was 2,555 students, served by 407.4 full-time-equivalent staff positions. The district operates five campuses, including one early childhood center, one elementary school, one middle school, one high school, and one alternative education campus. During school year 2021–22, the student population in WOCCISD was 54.1 percent African American, 21.6 percent Hispanic, 16.2 percent White, 0.4 percent Asian, 0.2 percent American Indian, 0.2 percent Pacific Islander, and 7.3 percent reported as two or more races. Additionally, 90.5 percent of WOCCISD students were categorized as economically disadvantaged.

FINANCIAL OVERVIEW

For school year 2022–23, WOCCISD adopted a budget of approximately $33.0 million. For school year 2021–22, WOCCISD's total actual expenditures for all funds were approximately $34.0 million. The district's actual operating expenditure per pupil during school year 2021–22 was $9,703, compared to the statewide district average expenditures per pupil of $11,943. During school year 2021–22, WOCCISD spent approximately 50.8 percent of total actual operating expenditures for instruction, compared to the state average of approximately 55.9 percent.

The district's total fund balances decreased by 4.6 percent from school years 2020–21 to 2021–22, with a total fund balance for school year 2021–22 of approximately $12.0 million.

FIGURE 1
WEST ORANGE-COVE CONSOLIDATED ISD ACCOUNTABILITY RATINGS
SCHOOL YEARS 2016–17 TO 2021–22

CAMPUS	2016–17	2017–18 (1)	2018–19	2019–20 AND 2020–21 (2)	2021–22
West Orange-Stark Elementary School	Improvement Required	Met Standard	D	Not Rated	Not Rated (4)
West Orange-Stark Middle School	Improvement Required	Not Rated (3)	F	Not Rated	B
West Orange-Stark High School	Improvement Required	Not Rated (3)	C	Not Rated	C
Districtwide	Met Standard	Not Rated (3)	C	Not Rated	B

NOTES:
(1)   The Legislature phased in a new accountability rating system for Texas public schools beginning in school year 2017–18, during which school districts received alphabetical ratings. Campuses received alphabetical ratings beginning in school year 2018–19.
(2)   Districts and campuses did not receive accountability ratings for school years 2019–20 and 2020–21 due to closures during the onset of the COVID-19 pandemic.
(3)   Districts that met criteria related to the effects of Hurricane Harvey and received a rating of Improvement Required were granted an accountability waiver for school year 2017–18.
(4)   Pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, districts and campuses that would have received a rating of D or F for school year 2021–22 are designated Not Rated.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2021–22.

WOCCISD's School Financial Integrity Rating System of Texas rating was A/Superior Achievement for school year 2022–23. The district received a Smart Score of 2.0, with an academic performance rating of Very Low Academic Progress and an Average spending rate in 2020, the most recent year for which this data is available. See the **Business Services Management** chapter for more information about these rating systems.

EDUCATIONAL OVERVIEW

TEA issues annual accountability ratings for each district and campus. **Figure 1** shows the state accountability ratings for WOCCISD's campuses from school years 2016–17 to 2021–22. North Early Learning Center is not subject to state accountability, because it does not include tested grade levels. Performance results for students assigned to the West Orange-Stark Academic Alternative Center are attributed to their home campuses.

For school year 2021–22, the district received an overall rating of B. Among the campuses, two received a B rating and one received a C rating. These scores demonstrate improvement compared to school year 2018–19, when campus ratings ranged from C to F, and compared to school year 2016–17, when most campuses were rated Improvement Required.

Figure 2 shows academic performance measures for WOCCISD compared to performance measure averages for school districts in Region 5 and the state. WOCCISD's academic performance is lower than regional and state

academic performance for most measures. In calculating a district's career, college, and military readiness rating, TEA considers several student achievements. For example, readiness can be demonstrated by completing dual-credit courses, earning industry certifications, and meeting Texas Success Initiative criteria in reading, language arts, and mathematics.

ACCOMPLISHMENTS

During its review, the LBB School Performance Review team identified noteworthy accomplishments resulting from the district's best practices. Subsequent chapters discuss six district accomplishments, including the following practices.

COMMUNITY ENGAGEMENT

WOCCISD effectively collaborates with the community through partnerships with various organizations to support students and families. The Communications Department has established robust processes for efficient communication, ensuring consistency in publications and establishing a recognizable brand for digital and print materials. The department also has produced informative videos intended to provide transparency, promote campus and district events, and cultivate community support for the schools. Some of these videos highlight the district's career and military readiness program, school bands, school choirs, and homecoming events, and provide insights into a typical day in the life of a high school athlete. The department posts these videos on the district's YouTube channel and Facebook

FIGURE 2
ACADEMIC PERFORMANCE MEASURES FOR WEST ORANGE-COVE CONSOLIDATED ISD (WOCCISD) COMPARED TO AVERAGES WITHIN REGIONAL EDUCATION SERVICE CENTER V (REGION 5) AND THE STATE, SCHOOL YEAR 2021–22

ANNUAL COLLEGE, CAREER, OR MILITARY READINESS OF GRADUATES (1)

WOCCISD	65.3%
Region 5	51.4%
State	65.2%

PERCENTAGE OF STUDENTS AT ALL GRADE LEVELS THAT APPROACHED GRADE-LEVEL STANDARD OR ABOVE ON STAAR TEST

WOCCISD	51.0%
Region 5	68.0%
State	74.0%

PERCENTAGE OF STUDENTS AT ALL GRADE LEVELS THAT MET GRADE-LEVEL STANDARD OR ABOVE ON STAAR TEST

WOCCISD	24.0%
Region 5	40.0%
State	48.0%

PERCENTAGE OF STUDENTS AT ALL GRADE LEVELS THAT MASTERED GRADE-LEVEL STANDARD OR ABOVE ON STAAR TEST

WOCCISD	11.0%
Region 5	20.0%
State	25.0%

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

WOCCISD	8.6%
Region 5	26.9%
State	32.9%

AVERAGE SAT SCORE

WOCCISD	889
Region 5	982
State	1,002

NOTES:
(1) To be considered college-ready, a graduate must have met or exceeded the college-ready criteria on the State of Texas Assessments of Academic Readiness (STAAR) end-of-course examinations, or the SAT or ACT standardized college admissions tests.
(2) Criterion refers to the percentage of examinees who scored: (a) at or above the criterion scores for language arts of 480 on the SAT evidence-based reading and writing section or at least 19 on the ACT English section and an overall composite ACT score of 23; and (b) at or above the criterion scores for mathematics of 530 on the SAT mathematics section or at least 19 on the ACT mathematics section and an overall composite ACT score of 23.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2021–22.

pages, bolstering student and staff morale while increasing community awareness of school district events, programs, and student life.

Additionally, WOCCISD campuses offer a comprehensive range of family and community services, including liaisons for foster care, homeless education, dropout prevention, and community engagement. The community liaisons provide a vital service by communicating between WOCCISD staff and families in the community. The district also collaborates with several community organizations to facilitate access to mental health support, housing programs, counseling services, a food and grocery program, and other essential resources for students and their families.

As part of a population that is more than 90.0 percent economically disadvantaged, WOCCISD students encounter various challenges aside from academics. The district's commitment to providing students with numerous community-support services demonstrates its focus on addressing students' social, emotional, and physical needs.

CURRICULUM MANAGEMENT

WOCCISD has established and implemented a robust curriculum management plan that communicates expectations for the structure, delivery, and evaluation of student learning outcomes. The plan ensures consistency both horizontally (within grade levels) and vertically (from one grade level to the next) and aligns with the Texas Essential Knowledge and Skills (TEKS) state standards. The district places significant emphasis on lesson planning, using a matrix to communicate expectations for the components of a lesson plan and providing an online system for teachers to receive lesson plan feedback from campus and district leadership.

The district also monitors and evaluates curriculum delivery through the practice of classroom observations conducted daily by principals, associate principals, assistant principals, instructional coaches, or district leadership. The information gathered during these observations enables district leaders to provide regular feedback to teachers regarding their instructional practices and curriculum delivery. The curriculum and instruction leadership has implemented protocols for formal and informal assessments of instructional effectiveness, which are executed across all WOCCISD campuses.

In addition, WOCCISD's professional learning communities (PLC) support teachers in aligning curriculum, planning

formative and summative assessments, analyzing data, and fostering long-term student success. The district also has a strong instructional coaching program at each of its campuses. Instructional coaches assist with classroom management, data disaggregation, and student interventions. They support the implementation of lesson planning, professional development, and the adopted curricula; and they monitor classroom instruction and provide feedback or model lessons to improve instructional practices.

WOCCISD collects, analyzes, and applies student data to inform its instructional practices. At WOCCISD, the goal of improving a student's performance by 10 points, whether on a unit test or a benchmark assessment, is known as a "Plus 10 Goal." Staff reported that all students know their Plus 10 Goals in all subjects and assessments, and these goals have contributed to districtwide academic growth. This data-informed approach assists teachers and administrators to assess progress annually and make ongoing strategic curriculum adjustments.

CAREER AND TECHNICAL EDUCATION

WOCCISD's Career and Technical Education (CTE) program offers various courses and certifications to meet students' diverse needs. The district's CTE course offerings in areas such as arts, audio/visual technology, business, marketing, finance, health science, and manufacturing align with student interest and high-skill, high-wage, and in-demand occupations. The district, in partnership with Lamar State College – Orange, also offers five industry-based certifications to its students, including Adobe Certified Professional and American Welding Society Certified Welder.

The district's comprehensive CTE program provides students with expanded learning and career opportunities. Additionally, these course offerings, certifications, and dual-credit opportunities have enabled WOCCISD to raise the College, Career, and Military Readiness (CCMR) component score of the district's accountability rating. From school years 2020–21 to 2021–22, the district's CCMR raw component score increased by 16.1 percent, from a score of 56 to a score of 65. Although staff noted that the accountability rating increase was due in part to stronger Public Education Information Management System (PEIMS) reporting systems, the districts' actual college and career readiness gains were due to its CTE program growth.

In accordance with the federal Strengthening Career and Technical Education for the 21st Century Act, known as

Perkins V, the district annually evaluates its CTE program. Through the evaluation process, WOCCISD has expanded its course offerings to align with local industry demands and student interests. In addition, the district has begun to serve the community through its CTE courses. For example, residents can bring items to welding students for repair, and they can receive select services from cosmetology students. By engaging with the community and advertising the CTE program, the district has increased the program's enrollment.

BUDGET DEVELOPMENT PROCESS

WOCCISD's budget development process is timely and effective, and it receives widespread approval among staff and other key stakeholders. Written guidelines dictate the timeline for each step of the budgeting process. Each December, campuses solicit schedule requests from students and use the information to determine staffing needs. By March, department heads and principals must evaluate their current budgets and generate staffing and servicing requests for the following school year. The chief financial officer (CFO), superintendent, department heads, and principals then hold two meetings—one to discuss staffing, and another to discuss educational service requests. After leadership makes these decisions, the CFO finalizes any approved changes and aggregates that data into the district's budget for the subsequent school year. The budget is completed by June 1, after which the CFO and superintendent present the budget to the board and host a budget workshop to discuss any details or questions from board members regarding the budget proposal. The board votes on adopting the budget during the first week of July, before the start of the school year.

WOCCISD's budget process has resulted in a healthy fund balance sufficient to fund the district's operating expenditures for more than six months. In addition, staff reported that, by following the written budget guidelines, the budget is completed in a consistent and timely manner, and district administration effectively incorporates individual departmental and campus needs into the decision-making process.

FINDINGS AND RECOMMENDATIONS

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

(1) planning;

(2) staffing; and

(3) oversight and evaluation.

PLANNING

Effective school districts recognize the importance of continuous planning to address long-term needs, allocate resources efficiently, and meet stakeholder objectives. The review team identified several opportunities for the district to enhance its operational effectiveness through improved planning.

Two important sets of plans developed by school districts are the district improvement plan (DIP) and the campus improvement plans. These statutorily required annual plans are intended to guide school district staff to improve student performance. However, WOCCISD's DIP components, including the goals, performance objectives, and evaluation criteria, lack specificity and rigor. For example, WOCCISD's DIP does not quantify the district's goals or objectives or include specific, actionable strategies to achieve these goals.

A key operational plan that provides a framework for long-term facilities planning is a comprehensive facilities master plan, which supports the district's educational goals by identifying existing facility conditions, new or replacement facilities required to meet district needs, and funding options for facilities. The district's facility planning process is reactive and focuses on immediate problems and short-term solutions. Without a comprehensive facilities master-planning process, the district also has no defined method for prioritizing or budgeting for facility issues.

Another important tool for facilities management is an energy-management plan to help the district use the minimum amount of energy while providing a desired level of comfort to building occupants. Energy management plans should include strategies to educate building staff, enhance or automate building controls, properly maintain existing equipment, and install energy-efficient equipment as systems are replaced. At the time of the review, WOCCISD had not developed a comprehensive energy plan that includes these strategies or identifies actions to support the district's annual reduction in energy usage.

Similarly, WOCCISD lacks a comprehensive, board-adopted, vehicle replacement plan. The district makes ad hoc decisions to replace buses without the benefit of industry replacement criteria commonly used as a best practice in self-managed transportation departments. Without a defined and supported replacement plan, the average and maximum ages of the district's fleet of vehicles likely will increase, and maintaining an acceptable level of service will become increasingly difficult and more expensive for the district.

The following recommendations would assist the district's planning:

- establish a process to incorporate measurable and data-driven performance objectives and strategies into its district improvement plan;

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

- develop, document, and implement a districtwide energy-management plan to conserve energy and reduce annual energy costs; and

- develop a policy to guide replacement and disposal of buses and white-fleet vehicles based on each vehicle's mileage and age.

STAFFING

Effective staff management includes monitoring attrition rates and job satisfaction to plan for recruitment needs and help maintain a stable and experienced workforce. In addition, successful districts use industry standards and staffing formulas to determine the appropriate number of personnel in various roles and align staffing levels with the district's specific needs and student population. Efficient staffing practices contribute to the overall effectiveness of a school district and facilitate the provision of a safe, nurturing, and productive learning environment for all students.

WOCCISD has opportunities to improve staff management districtwide. First, the district has a higher rate of teacher turnover than its neighboring regional districts, and its turnover rate is nearly double the state average. The district lacks an effective process to track staff turnover and assess the available data to determine its cause. Without a formal process to assess why so many teachers are leaving WOCCISD, the district cannot address the problem effectively. Gaining an understanding of why some teachers leave and why some campuses are better able to retain their teachers would help district decision makers better target their resources to retain teachers, especially in the subject areas in greatest demand.

The district also does not track auxiliary and paraprofessional staff turnover. During interviews, staff reported a high turnover rate among custodians, bus aides, and paraprofessional staff. However, the district could not provide any official turnover rates among these positions, nor could it identify whether this turnover trend had been occurring for several school years or had developed recently. A high turnover rate among staff is detrimental to school district operations and the overall education of students. Staff turnover increases district expenses through lost productivity, updating security and computer systems, new staff training, advertising and recruiting, and sign-on bonuses.

Failure to address turnover can result in low morale and may impede the district from understanding how to recruit and retain staff. For example, the district employs insufficient vehicle maintenance staff for its fleet size. Staff report that competition from the petroleum industry has resulted in a shortage of skilled vehicle technicians in the West Orange area; however, the district has not developed a plan to attract and retain qualified mechanics. Adequate mechanical support is critical to the functionality of a school district's fleet operations. The district's ability to transport students safely, on time, and in a manner that meets the community's expectations is impaired without a sufficient staff of experienced fleet mechanics.

In addition to not monitoring and tracking turnover, the district does not use staffing formulas or industry standards to determine the number of staff for several operational areas. Failure to adhere to staffing standards can result in understaffing in critical areas. For example, the district assigns fewer counselors, nurses, and safety and security staff to some campuses than recommended by industry standards. A campus without an officer present during the school day might be required to wait for nearby officers from the district or city to respond during an emergency. Additionally, pursuant to House Bill 3, Eighty-eighth Legislature, Regular Session, 2023, all school districts are now required to post an armed security officer at each campus for the duration of the regular school day. A campus lacking a nurse due to absence would have no staff available to respond to medical situations while the nurse is absent. And the limited number of counselors on staff at the district may struggle to manage all student schedules and meet students' social and emotional needs.

Conversely, the lack of staffing standards can result in overstaffing and increased operational costs. For example, the district's Child Nutrition Department does not assign hours to kitchen staff based on productivity metrics. Instead, the allocation of hours is based on historical staffing assignments, and the district has not assessed whether the number of staff per kitchen is appropriate relative to the number of meals served. As a result, the department is unable to monitor labor costs and determine whether the department is using its resources efficiently.

The following recommendations may enhance the district's staffing management:

- develop a comprehensive turnover tracking process that uses survey data to determine staffing retention opportunities;

- develop and implement a plan for recruiting qualified mechanics;

- hire an additional campus safety officer to be stationed at North Early Learning Center and establish staffing standards for the WOCCISD Police Department and Student Services Department; and

- develop and implement a food service staffing formula based on industry standards.

OVERSIGHT AND EVALUATION

Effective and efficient school districts have systems of oversight and measurable performance metrics to hold administrators and staff accountable for achieving goals. These systems provide a means to evaluate progress, identify areas for improvement, and celebrate achievements. Moreover, accountability mechanisms promote transparency, which inspires confidence in the district's commitment to educational excellence among stakeholders, including students, parents, and the community.

WOCCISD lacks processes for evaluation and standards for accountability for several key programs and operations. For example, the district does not have a process to align its library operations with performance metrics contained in the Texas State Library and Archives Commission (TSLAC) standards. As a result, WOCCISD's libraries do not meet TSLAC standards for effectiveness in the areas of resource budgeting, staffing ratios, and collections. Failure to ensure that these library program components meet industry standards may result in reduced access to learning resources and limited support for students' academic growth.

Similarly, the Transportation Department does not track any performance metrics to assess the overall efficiency of its transportation services. The district does not compare its performance to established benchmarks, key performance indicators (KPI), or practices in peer districts to identify areas for improvement. KPIs track progress toward achieving the organization's objectives by monitoring activities that could promote, prevent, or hinder the attainment of those objectives. Without a process to track performance metrics, the Transportation Department is not equipped to identify inefficient operations and opportunities to lower costs.

The district also lacks an effective process for evaluating its disciplinary alternative education program (DAEP). The purpose of a DAEP is to provide temporary student placements for behavior management, often as alternatives to suspension or expulsion. The goal is for students to return to and succeed in their regularly assigned classrooms and schools. However, WOCCISD does not track recidivism rates or evaluate the effects of DAEP referrals on students' academic outcomes. Without a process to evaluate this data, it is not possible to determine whether the program is helping students perform successfully in their general education classrooms.

In addition to gaps in program oversight, WOCCISD has no formal process to monitor contract requirements or evaluate vendor performance. Without proper contract oversight, WOCCISD exposes itself to potential fraud and substandard service by vendors. For example, the district does not ensure its food service management company adheres to contract requirements, which has resulted in cafeterias serving food that deviates from the components of the cycle menus included in the contract and in some cases does not meet federal nutrition requirements. If WOCCISD does not document and monitor contract performance appropriately, the district may not be able to avail itself of legal remedies in case of breach of contract, unsatisfactory performance by a vendor, or any other loss to the district resulting from a service contract or provider.

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

- conduct a comprehensive assessment of the district's library services to align its campus libraries' staffing, collections, and associated budgets with TSLAC standards;

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

- establish a process to monitor and evaluate the effectiveness of the district's DAEP;

- establish processes for district oversight of the development of menus and quality of food in the district's cafeterias; and

- develop and implement a formal contract management process featuring written procedures and practices to identify all district contracts,

centrally capture and monitor contract requirements, and evaluate vendor performance.

The following chapters summarize the district's accomplishments and the review team's findings and numbered recommendations. Detailed explanations for the accomplishments and recommendations include estimated fiscal impacts. Each chapter concludes with fiscal data, when appropriate, showing the chapter's recommendations that have estimated savings or costs for school years 2023–24 to 2027–28.

1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT

ACCOMPLISHMENTS

♦ West Orange-Cove Consolidated Independent School District (WOCCISD) engages in effective long-term, strategic planning for campuses and departments.

♦ The WOCCISD Communications Department's processes and procedures promote the effective and coherent dissemination of information to the community.

♦ WOCCISD campuses provide students and families a range of high-quality community-support services.

♦ WOCCISD's leadership teams provide an effective structure for communication between the superintendent and key district staff.

FINDING

♦ WOCCISD's district improvement plan components, including the goals, performance objectives, and evaluation criteria, lack specificity and rigor.

RECOMMENDATION

♦ **Recommendation 1: Establish a process to incorporate measurable and data-driven performance objectives and strategies into the district improvement plan.**

BACKGROUND

An independent school district's governance structure, staff management, and planning process provide the foundation for effective and efficient education of students. An elected board of trustees governs each school district in Texas. The board focuses on decision making, planning, and providing resources for achieving goals. It sets goals, objectives, and policies and approves plans and funding necessary for school district operations. The superintendent implements policy, manages district operations, recommends staffing levels, and allocates resources to implement

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

A school district's community involvement function requires communicating with stakeholders and engaging them in district decisions and operations. District stakeholders include students, staff, parents, residents, and businesses. Stakeholders must be aware of issues facing the district, support its priorities, and respond to its challenges. Communication tools include public meetings, campus-to-home communications, family and community engagement events, local media, the district's website, other technological tools, and social media.

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

West Orange-Cove Consolidated Independent School District (WOCCISD) is located in Orange County, approximately 112 miles northeast of Houston. It serves the cities of West Orange, Pinehurst, and portions of Orange, which are located in the eastern portion of the Beaumont–Port Arthur metropolitan area adjacent to the Louisiana border. According to the U.S. Census Bureau, in calendar year 2020, West Orange had a population of 3,459, and Pinehurst had a population of 2,232. The portion of Orange served by WOCCISD does not have an exact population estimate; however, this area includes most of the city of Orange south of Interstate 10. **Figure 1–1** shows the population changes in West Orange, Pinehurst, and Orange during the past 20 years. The population of Orange includes the entire city, not just the area served by WOCCISD.

FIGURE 1–1
WEST ORANGE, PINEHURST, AND ORANGE POPULATIONS
CALENDAR YEARS 2000 TO 2020

CITY	2000	2010	2020	POPULATION CHANGE
West Orange	4,111	3,443	3,459	(15.9%)
Pinehurst	2,274	2,097	2,232	(1.8%)
Orange	18,643	18,595	19,324	3.7%

SOURCE: U.S. Census Bureau, Population Estimates for July 1, 2000; July 1, 2010; and July 1, 2020.

FIGURE 1–2
WEST ORANGE, PINEHURST, AND ORANGE DEMOGRAPHICS, CALENDAR YEAR 2020

RACE OR ETHNICITY	WEST ORANGE	PINEHURST	ORANGE
White	64.9%	63.4%	49.2%
Hispanic or Latino	16.6%	14.7%	9.5%
African American	12.6%	15.1%	35.2%
Asian	1.2%	1.4%	1.8%
American Indian and Alaskan Native	0.5%	0.7%	0.3%
Two or More Races	4.1%	4.2%	3.7%

NOTE: Race and ethnicity are considered separate and distinct identities within U.S. Census Data. Hispanic or Latino origin is considered an ethnicity in census data and is asked in a separate question from race. Therefore, percentages shown may not sum to 100.0 percent.
SOURCE: U.S. Census Bureau, Population Estimates for July 1, 2020.

Figure 1–2 shows the calendar year 2020 demographics of the populations of West Orange, Pinehurst, and Orange.

For calendar year 2021, the cities served by WOCCISD reported the following median household incomes:

- $56,379 in West Orange;
- $44.893 in Pinehurst; and
- $58,778 in Orange.

WOCCISD is located in the Texas Comptroller of Public Accounts' (CPA) regional categorization of Southeast Texas. According to CPA, 12.8 percent of total employment in the region during fiscal year 2019 was in manufacturing, and more than 38.0 percent of Orange County wages were from the petrochemical manufacturing and energy sector. Southeast Texas is the site of the world's largest oil refinery, Motiva, and several petrochemical companies. The region also includes industries such as sheet metal and architectural metal fabrication, energy-related industrial manufacturing, and rail car maintenance.

During school year 2021–22, WOCCISD employed 407.4 full-time-equivalent staff positions, and the district had 2,555 students enrolled. The demographic data from school year 2021–22 shows the student population was 54.1 percent African American, 21.6 percent Hispanic, 16.2 percent White, 0.4 percent Asian, 0.2 percent American Indian, 0.2 percent Pacific Islander, and 7.3 percent reported as two or more races. Additionally, 90.5 percent of WOCCISD students were categorized as economically disadvantaged. Student enrollment has increased in WOCCISD by 6.3 percent during the past five school years, from 2,404 students in school year 2017–18 to 2,555 students in school year 2021–22.

The district has five campuses that include North Early Learning Center, West Orange-Stark Elementary School, West Orange-

FIGURE 1–3
WEST ORANGE-COVE CONSOLIDATED ISD BOARD OF TRUSTEES, SCHOOL YEAR 2022–23

MEMBER	ROLE	EXPERIENCE
Linda Platt-Bryant	President	Elected in 2015
Gina Simar	Vice President	Elected in 2019
LaTricia Ann Stroud	Secretary	Elected in 2018
Ruth Hancock	Member	Elected in 2014
Demetrius Hunter	Member	Elected in 2016
Roderick Robertson	Member	Elected in 2015
Tommy Wilson, Sr.	Member	Elected in 2017

SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

Stark Middle School, West Orange-Stark High School, and West Orange-Stark Academic Alternative Center, which houses the district's disciplinary alternative education program.

The WOCCISD Board of Trustees is the policymaking body authorized by law to govern the district. The board's responsibilities include the following duties:

- adopting goals and objectives for the district;
- adopting and reviewing policies;
- hiring and evaluating the superintendent;
- adopting an annual budget and tax rate; and
- communicating with the community.

The board's seven members serve staggered, three-year terms, and WOCCISD holds at-large board elections annually in May as terms expire. **Figure 1–3** shows WOCCISD's board members and their respective roles and experience as of October 2022.

The Legislative Budget Board's (LBB) School Performance Review Team visited the district in October 2022. At the time of the onsite visit, all board members had met or exceeded the statutory requirements for initial training and continuing education. The superintendent's secretary tracks board trainings, and members also track trainings individually through their Texas Association of School Boards accounts.

The district conducts monthly public board meetings, facilitated by the board president. The superintendent's office prepares materials for the meetings, providing all board members access to essential data and information before each meeting. The board typically meets on the last Monday of each month in the central administration building's board room. Board Policy BE (LOCAL) states that the district may call special meetings at the board president's discretion or upon the request of two board members. The district held no special meetings during calendar year 2022.

Information recorded during interviews and observations indicated that board meetings are run efficiently, consistently following Robert's Rules of Order. During interviews, board members and staff also reported that the district has an effective process for placing items on the board meeting agenda and ensuring that board meetings were focused on agenda items.

The public may attend all regular meetings and may address the board on topics of interest. Individuals who want to address the board or provide public comment must register at least five minutes before the start of the meeting and indicate the topic of discussion. In compliance with the Texas Open Meetings Act, district staff post public notifications of board meetings on a bulletin board outside the district's central administration building and electronically on the district's website. The board addresses personnel matters and other confidential topics in closed sessions as needed, and it also maintains a certified agenda of any closed-session proceedings, as required by the Texas Government Code, Section 551.103.

The superintendent's secretary records the minutes of board meetings and distributes them by email to WOCCISD board members for approval at the next board meeting.

During interviews, board members and staff reported that the board and superintendent have an excellent working relationship. Board members said that they are well-informed of district operations and any issues that occur on the campuses. The superintendent communicates with the school board through one-way group texts, calls, emails, and individual meetings in addition to regular group meetings. Notably, the Communications Department distributes weekly bulletins that inform board members of upcoming events and major department updates that might not be discussed during board meetings. These bulletins are written in a user-friendly format, and copies are available digitally and in print. The chief communications officer develops the bulletins with input from each campus and department.

Dr. Ricky Harris has been the WOCCISD superintendent since March 2015. The superintendent reports directly to the board, and seven staff report directly to the superintendent. **Figure 1–4** shows WOCCISD's organization at the time of the review team's onsite visit.

As shown in **Figure 1–4**, the district's organizational structure aligns with industry standards and best practices employed by peer districts, with no executive position directly supervising more than eight positions. Peer districts are districts similar in size and other characteristics to WOCCISD that are used for comparison purposes. For this review, the three peer districts chosen were Bellville ISD, Coldspring-Oakhurst Consolidated ISD, and Sweeny ISD. During interviews, WOCCISD staff reported that the district's organizational structure was communicated clearly and understood. Additionally, WOCCISD's organizational structure contributes to the district's effective process for communicating information among staff.

The Communications Department, the director of student services, and campus administrators manage the district's community involvement processes. The chief communications officer oversees the district's Communication Department, which produces all digital and print media releases and monitors or develops all mass communication to parents and the community. Campuses coordinate and host events throughout the year, including open houses, holiday parties, and parent lunches. Campuses route event information to the Communications Department for review and approval before it is released to parents and the community.

The chief communications officer has primary responsibility for managing WOCCISD's websites and social media accounts. Each department and campus has one or more staff responsible for updating site content. The chief communications officer meets with department and campus staff monthly to demonstrate software features or provide support. The director of federal programs alerts relevant staff when required postings are needed.

FIGURE 1–4
WEST ORANGE-COVE CONSOLIDATED ISD ORGANIZATION
SCHOOL YEAR 2022–23
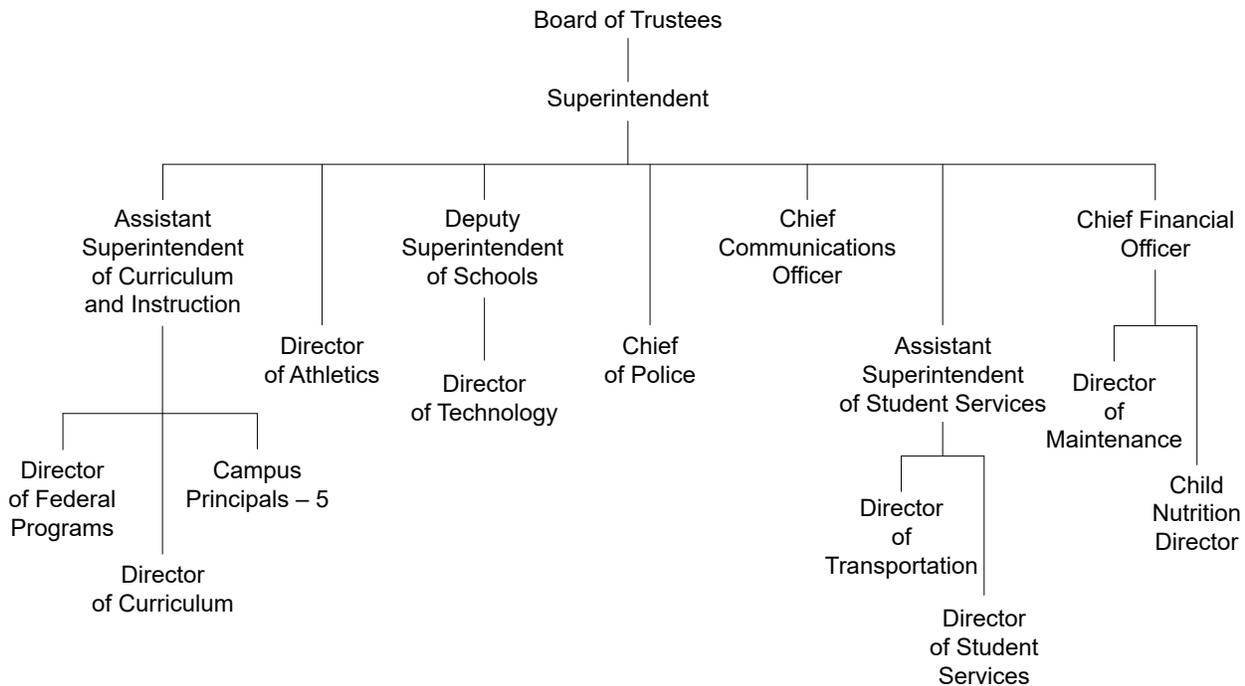
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

The district has two community liaisons. The liaisons are responsible for providing information to parents, conducting home visits, obtaining overdue parent or guardian signatures, and informing parents of campus events and available resources. West Orange-Stark Elementary School has one community liaison, and West Orange-Stark Middle School and West Orange-Stark High School share a community liaison. North Early Learning Center is a Head Start campus and has several caseworkers who support students and their families. The U.S. Department of Health and Human Services, Administration for Children and Families, supports Head Start programs for prekindergarten-age children in public schools nationwide. North Early Learning Center also has a family development coordinator who manages the caseworkers.

Communities In Schools (CIS) site coordinators also support WOCCISD students. CIS is a national nonprofit organization that provides academic and nonacademic support to students. The coordinators collaborate with district staff to identify students who may need additional support. Based on each student's needs, CIS coordinators provide individual counseling, support groups, basic life skills, tutoring, mentoring, and enrichment opportunities. West Orange-Stark Elementary School, West Orange-Stark Middle School, and West Orange-Stark High School each have one assigned CIS coordinator.

The deputy superintendent of schools supervises the fulfilment of open records requests according to statutory requirements. The district receives, on average, two to three open records requests each month. WOCCISD does not have a process to track the district's efficiency in fulfilling requests however, onsite observations and interviews with staff confirmed that requests are processed in a timely manner.

Staff reported that the COVID-19 pandemic has made it difficult for the district to maintain parent-teacher organizations (PTO) during the past three school years. In October 2022, no WOCCISD campus had an active PTO or association in place. North Early Learning Center has a parent policy council, and staff reported that West Orange-Stark Elementary School plans to form a PTO. Parent and community volunteers are recruited, trained, and assigned at the campus level. Staff reported a decrease in parental

participation following the reopening of campuses since the onset of the pandemic; however, the district does not have standardized procedures or processes for tracking the number of volunteers. Volunteers must pass background checks, which are processed by the Human Resources Department, before they can participate in student activities.

WOCCISD previously maintained an educational foundation that became inactive with the onset of the pandemic in 2020. In October 2022, district staff reported that the president of the foundation and WOCCISD administration intended to reinstitute the organization. Since its inception in 2011, the foundation has awarded 50 grants for an estimated total of $152,000.

DETAILED ACCOMPLISHMENTS

LONG-TERM PLANNING

WOCCISD engages in effective long-term, strategic planning for campuses and departments.

Strategic planning is an effective tool for school districts to engage stakeholders, identify goals, allocate resources, and build capacity towards a shared vision. A strategic plan enables a school district to define and share the direction it will pursue during the next three to five years. The plan includes a district's vision and mission statements, multiyear goals, and the actions the district will take to achieve those goals. Strategic plans provide school districts with a proactive approach to addressing long-term and systemic needs, which may not be addressed in annual plans such as the district improvement plan (DIP) and the campus improvement plans (CIP).

Before the current superintendent's appointment in 2015, the district did not have a strategic planning process. Dr. Harris has since prioritized its development and established a steering committee to oversee this process. The committee, which consisted of stakeholders including staff, board members, parents, and students, adopted a plan for five years to seven years that included a mission statement, a vision statement, district and campus strategic goals, and beliefs statements. The superintendent reported that the strategic goals were intended to assess and address critical issues in the district and community. Many participants reported feeling that their input was valued as part of the process of developing the strategic plan.

As part of the strategic planning process, each department and campus developed detailed priorities and corresponding

budget projections for one year, three years, and five years. The district calls the final product of this planning process the 1-3-5 Plan. WOCCISD has established a district educational improvement committee that evaluates the ongoing progress of the strategic plan. The board annually reviews and approves the strategic plan and its one-year, three-year, and five-year components. Board members report that at least one of the strategic plan's long-term goals is addressed and discussed at each monthly board meeting.

In 2020, the district began the process of updating its strategic plan after the original plan expired. WOCCISD adopted new goals and outlined the expenses associated with achieving the goals in the updated 1-3-5 Plan. At the time of the review team's onsite visit, WOCCISD's strategic plan contains a detailed outline of fiscal expectations by campus, department, and service.

WOCCISD has established and maintained a long-term, strategic plan and has built and updated several interlocking and cross-supportive plans, including the 1-3-5 Plan, the DIP, and the individual CIPs. The detailed nature and regular review of the district's strategic plan facilitate it to be a useful, supportive document that assists the district in determining its present and future needs.

COMMUNITY COMMUNICATION

The WOCCISD Communications Department's processes and procedures promote the effective and coherent dissemination of information to the community.

The district's Communications Department has strong processes for managing and facilitating effective communication, such as ensuring consistency among campus and department publications; establishing clear guidelines for student media; and developing high-quality, growth-focused media.

The Communications Department is led by the chief communications officer, who is responsible for maintaining and monitoring external communications for the district. The Communications Department has established a consistent and unified style, or brand, that enhances the readability and usefulness of digital and print communications distributed to parents and the community. The department reviews and edits digital and print media releases from districts and campuses to reinforce district branding standards. It also translates print and digital materials into Spanish.

The Communications Department organized a focus group of students in school year 2021–22 to elicit feedback on plans for social media development and communications growth. Requesting opinions from the student body and using that feedback to inform processes demonstrates that the department values and supports the student population.

Additionally, the department expanded in school year 2021–22 to include a media specialist with a video production background. Since then, the department has developed a series of videos intended to provide transparency, advertise campus and district events, and foster community support for campuses. The videos also serve as high-quality media materials that stakeholders can use when engaging various audiences on district business. Some of the videos highlight the district's career and military readiness program, school bands, school choirs, homecoming events, and a day in the life of a high school athlete. The department posts videos on the district's YouTube channel and Facebook pages. They bolster student and staff morale while increasing community awareness of school district events, programs, and student life.

In addition to its unified messaging procedures, the Communications Department has effective processes for authorizing and releasing images of students in district media. Certain students are not filmed or photographed, either for personal or legal reasons, and staff consistently reported a strong, working knowledge of the importance of consent for distribution of images of students and the process for securing and confirming media releases. Teachers in WOCCISD are responsible for maintaining a working knowledge of their students' media permissions. Before the department begins photographing or filming, the media specialist or other Communications Department staff consults the relevant teachers to identify students who have not consented to be filmed or photographed. Additionally, staff reported confirming student authorization before releasing media containing images of students. According to the media specialist, the district's process for obtaining and checking media consent is intended to promote students' right to privacy while maintaining students' ability to participate in district activities.

FAMILY AND COMMUNITY SUPPORT SERVICES

WOCCISD campuses provide students and families a range of high-quality community-support services.

At the time of the review team's onsite visit, WOCCISD offered the following family and community services: a foster care liaison; a homeless education liaison; a dropout prevention program; and a community liaison program. Community liaisons facilitate contact between WOCCISD staff and families in the community. They monitor attendance lists at their campuses and contact the parents or guardians of students who have unexplained absences of more than three consecutive days. Liaisons conduct home visits when necessary, which also may occur when counselors, teachers, librarians, diagnosticians, or other staff have attempted unsuccessfully to communicate with the families via traditional methods.

The district also partners with the following community organizations:

- Communities in Schools, which connects students in need of additional support with on-campus social workers that can connect them with resources;

- Texas Child Health Access Through Telemedicine, which provides telehealth mental health services to students;

- Spindletop Center, which provides supported housing programs and mental, behavioral, and disabilities health services, including family and individual counseling; and

- Houston Circle of Hope, which provides additional mental health services for students.

Community-service supports are especially strong at North Early Learning Center, which has a mental health team that includes a behavior specialist, a child psychologist, and a staff counselor who provides mental health support to students and their parents or guardians. The campus has regular workshops for parents, such as monthly nutrition and safety workshops presented by the school nurse. The campus addresses families' food insecurity by partnering with Southeast Texas Food Bank, which, in coordination with Feeding America, offers the BackPack food program, a free food and grocery program that discreetly distributes foods to eligible students. In addition, the district arranges transportation services to assist families. A staff of five case workers organized by a family development coordinator communicates with families to address their needs. Classroom connections to families also are strengthened through various methods, including a program for grandparents to volunteer daily in the classrooms. Additionally, teachers at North notify families through classroom social media pages and weekly newsletters.

As part of a population that is more than 90.0 percent economically disadvantaged, WOCCISD's students face many challenges aside from academics. The district's commitment to providing students with numerous community-support services demonstrates its focus on addressing students' social, emotional, and physical needs.

LEADERSHIP COMMUNICATION

WOCCISD's leadership teams provide an effective structure for communication between the superintendent and key district staff.

The district's leadership structure provides a solid foundation for coordination and communication throughout all departments and campuses. The district's executive leadership team (ELT) consists of the superintendent, the deputy superintendent of schools, the assistant superintendent of student services, the assistant superintendent of curriculum and instruction, the chief financial officer, the chief communications officer and the district chief of police. At weekly ELT meetings, members provide updates and reports on their areas of responsibility, and the team often brainstorms ideas to guide the district's vision.

The district's leadership team (LT) consists of the members of the ELT, all the department heads, and all the campus principals. The LT meets monthly to identify actionable steps toward achieving the district's vision and to communicate information to the campuses and department staff. Staff reported a culture within the LT that welcomes members' contributions and solicits input from those who are not scheduled on the agenda to speak.

The interconnectedness of both leadership teams facilitates the dissemination of information. The ELT focuses on big-picture projects, such as long-term strategies and district goals, and the LT focuses on the details and action plans to accomplish the district goals. Those leadership team members then share that information with their individual departments and campuses.

During interviews, staff reported a strong working relationship with the superintendent and open communication. Meetings of the LT and ELT reportedly are managed well. Additionally, staff said that the superintendent actively promotes transparency, prioritizing communication with all levels of leadership.

Staff reported that WOCCISD's communication system effectively delivers detailed information from campus and department staff to the top levels of leadership while also disseminating leadership decisions to all staff efficiently.

DETAILED FINDING

PLANS AND GOALS (REC. 1)

WOCCISD's district improvement plan components, including the goals, performance objectives, and evaluation criteria, lack specificity and rigor.

In accordance with the Texas Education Code, Section 11.252(a), each school district is required to develop, evaluate, and revise an annual district improvement plan (DIP) to improve all students' performance. Statute specifies certain requirements for the DIP and other aspects of district-level and campus-level planning, as shown in **Figure 1–5**.

The statute does not require districts to establish a minimum number of goals, performance objectives, strategies, evidence-based practices, or evaluation criteria. Rather, statute outlines topics each district must address (e.g., dropout reduction, higher education admission, positive behavior interventions and supports) and specifies prerequisites for developing the plan, such as the use of a comprehensive needs assessment; the involvement of parents, staff, and community members; and the inclusion of certain measurable performance measures. The specific structure and length of the plan and goals are up to the district's discretion.

WOCCISD is compliant with much of the required DIP process and components. The District Educational Improvement Committee (DEIC) supervises the development of district-level and campus-level improvement plans, as required by statute. During onsite interviews, staff reported that the district completes an annual needs assessment, which is distributed to the DEIC members along with the previous year's DIP to prepare them for the initial planning meeting. The director of federal programs oversees the DIP's development and receives annual training on the needs assessment process from regional Education Service Center V (Region 5). In addition, the district utilizes a vendor, Plan4Learning, to prepare the planning document and verify that required DIP components are included.

Although the district uses several data-driven systems to analyze student progress, its DIP does not represent this commitment to data analysis. Best practices in effective district planning, as identified by Hanover Research (2014), emphasize the importance of realistic, data-based improvement goals. The North Carolina School Improvement

FIGURE 1–5
THE TEXAS EDUCATION CODE IMPROVEMENT PLAN REQUIREMENTS AND STATUTORY AUTHORITY, OCTOBER 2022

SUBSECTION	IMPROVEMENT PLAN REQUIREMENTS
§11.251(a)(2)	District and campus plans shall support the state goals and objectives specified in the Texas Education Code, Chapter 4: Parents will be partners in education; students will be encouraged and challenged to meet their full potential; students will remain in school until graduation; students will be prepared to succeed in postsecondary activities; educators will cultivate informed patriotism; highly effective personnel will be recruited, developed, and retained; students will demonstrate exemplary performance compared to national and international standards; campuses will be safe and disciplined; educators will be aware of innovative instruction; technology will be implemented effectively; the state will support career and technology education.
§11.251(b)	Planning processes shall involve the professional staff of the district, parents, and community members in establishing and reviewing the district's and campuses' educational plans, goals, performance objectives, and major classroom instructional programs.
§11.252(a)(2)	The district improvement plan must include measurable district performance objectives.
§11.252(a)(3)(B)	The district improvement plan must include evidence-based practices that address the need for programs, including: (i) suicide prevention, (ii) conflict resolution, (iii) violence prevention, (iv) dyslexia treatment.
§11.252(a)(3)(C)	The district improvement plan must include strategies to address dropout reduction.
§11.252(a)(3)(E)	The district improvement plan must include strategies to address positive behavior interventions and support, including interventions and support that integrate best practice on grief-informed and trauma-informed care.
§11.252(a)(4)	The district improvement plan must include strategies for providing to elementary school, middle school, junior high school, and high school students, those students' teachers and school counselors, and those students' parents information about (A) higher education admissions and financial aid opportunities, (B) the need for students to make informed curriculum choices to be prepared for success beyond high school; and (C) sources of information on higher education admissions and financial aid.
§11.252(a)(5), (a) (6), and (a)(7)	The district improvement plan must include provisions for resources needed to implement identified strategies, staff responsible for ensuring compliance of each strategy, and timelines for ongoing monitoring of each strategy.
§11.252(a)(8)	The district improvement plan must include formative evaluation criteria for determining periodically whether strategies are resulting in intended improvement of student performance.

Source: The Texas Education Code, Chapter 11, Subchapter F.

Planning Implementation Guide (2016) recommends that "school improvement plans shall contain clear, unambiguous targets, explicit indicators, and actual measures" for meeting standards. In addition, the Texas Education Agency's Lone Star Governance Program provides extensive guidance in creating specific, quantifiable board goals as the foundation to its continuous-improvement training system for governance teams.

WOCCISD's school year 2022–23 DIP has five goals. Each goal is connected to several performance objectives; and each performance objective contains several strategies. **Figure 1–6** shows WOCCISD's DIP goals and example objectives compared to two other Texas school districts' corresponding improvement plan language.

As shown in **Figure 1–6**, the improvement plan language of Jarrell ISD includes measurable goals that specify what the district will achieve. For example, Jarrell ISD plans to increase the percentage of students who score Approaches Grade Level or above on the State of Texas Assessments of Academic Readiness (STAAR) for reading and math by ten points (goal

one, performance objective one). In addition, the Jarrell ISD DIP also specifies a deadline for improvement plan goals. Jarrell ISD also includes specific, actionable strategies to achieve their goals. For example, the plan states that the district will "Monitor instructional implementation of the Jarrell ISD Literacy Framework using walk-throughs with the campus administration team" (goal one, performance objective two, strategy two). Finally, the Jarrell ISD DIP is noteworthy because it includes provisions to improve services to gifted and talented students (goal one, performance objective six) as required by the Texas State Plan for the Education of Gifted/Talented Students.

The district improvement plan language of Jarrell ISD contrasts with that of WOCCISD's improvement plan, which does not quantify the district's goals or objectives. For example, WOCCISD included the following performance objectives in its school year 2022–23 DIP:

- improve student performance through quality alignment of grade-level Texas Essential Knowledge and Skills to rigorous instruction;

FIGURE 1–6
WEST ORANGE-COVE CONSOLIDATED ISD AND JARRELL ISD DISTRICT IMPROVEMENT PLAN GOALS AND EXAMPLE OBJECTIVES
SCHOOL YEARS 2021–22 AND 2022–23

WEST ORANGE-COVE CONSOLIDATED ISD (WOCCISD)	JARRELL ISD (JISD)
Goal 1: WOCCISD will promote an atmosphere of high expectations within a culture of care, respect, and consequences.	Goal 1: Jarrell ISD will empower students to think critically, communicate, create, and collaborate in order to be successful, now and in the future.
Performance Objective 1: WOCCISD will provide alignment of curriculum, instruction, and assessment.	Performance Objective 1: By June 2023, the percentage of all students and each student group who score approaches grade level or above on State of Texas Assessments of Academic Readiness (STAAR) Reading and Math combined will increase by 10%.
Goal 2: WOCCISD will maintain a safe and secure environment that provides our faculty, staff, and students the peace of mind necessary for the pursuit of excellence.	Goal 1: Jarrell ISD will empower students to think critically, communicate, create, and collaborate in order to be successful, now and in the future.
Performance Objective 1: Improve School Safety/Community Relations with WOCCISD's Police Department.	Performance Objective 6: By June 2023, participation in the gifted and talented elementary program will increase by 25% to support skills development for placement in advanced academics.
Goal 3: WOCCISD will provide opportunities to increase family involvement.	Goal 3: Jarrell ISD will create a recruiting and retention plan.
Performance Objective 1: Increase school and community involvement in academic activities on all campuses. A required portion of our Title I funds will be set-aside to help fund activities.	Performance Objective 1: By June 2023, JISD will implement recruitment, hiring, and retention practices to acquire high-quality and diverse educators to meet the needs of a diverse growing school district to ensure 100% of vacancies and new positions are filled.
Goal 4: WOCCISD will ensure that every campus and department develops and understands the characteristics of the ideal WOCCISD employee.	Goal 5: JISD stakeholders will build a community that is safe, respectful, and responsible.
Performance Objective 1: Recruitment of quality educators.	Performance Objective 2: By June 2023, JISD will increase the methods and frequency of district communications and recognition of students and staff to families and the community by 25%.

SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, School Year 2022–23 District Improvement Plan; Jarrell ISD, School Year 2022–23 District Improvement Plan.

- meet individual student academic needs; and

- continue to expand and enhance technology infrastructure to better serve our staff and students.

In addition to the performance objectives, WOCCISD's DIP has a category titled Strategy's Expected Result/Impact. The language used in this section is not consistent. These statements appear to function as strategies, performance objectives, and formative evaluation criteria at various times.

For example, sometimes the strategy's expected result is written as an action statement, such as:

- identify strategies needed for success;

- establish districtwide Response to Intervention (RTI) goals; and

- conduct annual asbestos awareness/safety training.

In other instances, the strategy's expected result is written as a measurable outcome statement:

- at least 80.0 percent of all students meet or exceed their (plus 10) assessment goals; and

- fund balance of at least 33.0 percent of annual operating expenses.

Occasionally, the expected result statements are products, such as District RTI Handbook and Universal Screening Tools.

By contrast, Jarrell ISD writes all strategies as action statements, such as the following examples:

- Improve the use of data-driven instructional planning;

- Collect data for targeted small group instruction; and

- Improve teacher access to high-quality instructional resources.

In addition, the WOCCISD's DIP includes a Strategy's Expected Result/Impact statement that raises concerns in the context of the state's recent history regarding the appropriate identification of students served by special education. Goal 1, Performance Objective 2, is to "Meet individual student academic needs." Strategy 2 under this performance objective states, "WOCCISD will update the RTI handbook and guidelines." The expected result of this strategy is a "Reduction in special education referrals."

As stated in the U.S. Department of Education's Office of Special Education Program's 2017 Monitoring Visit Letter to Texas, "Reductions in the percentage of children found eligible to receive special education and related services would not violate the Individuals with Disabilities Education Act (IDEA) if every child suspected of having a disability was properly identified, located, and evaluated in accordance with the U.S. Code of Federal Regulations, Title 34, Section 300.111." However, the letter identifies concerns specific to Texas school districts, including the implementation of RTI to reduce special education rates by delaying or denying timely evaluation of students for special education and related services pursuant to the IDEA, in violation of federal law.

Although this section of the plan initially raised concerns because of potential implications for IDEA compliance, the review team found no evidence from its onsite analysis that RTI processes or requirements delayed or denied the provision of special education evaluation or services to children suspected of having a disability. The review team concluded that Student Services Department staff were aware of and in compliance with federal special education guidance regarding RTI but were not familiar with the specifics of the district-planning criteria related to RTI and special education referrals. Although staff reported effective communication during WOCCISD's district-planning process, in this instance, it is likely the appropriate staff were not involved in reviewing or evaluating certain plan components relevant to their responsibilities.

WOCCISD should establish a process to incorporate measurable and data-driven performance objectives and strategies into its district improvement plan.

The director of federal programs should assess training opportunities for developing data-driven district plans, goals, and continuous improvement processes. The superintendent should determine which board members, district staff, and DEIC members would benefit from attending these trainings.

Additionally, the assistant superintendent of curriculum and instruction should collaborate with the director of federal programs to identify how existing data-driven processes can be integrated with the DIP development and goal monitoring processes. For areas in which alignment exists, leadership should develop DIP language to represent this outcome. For example, DIP goals and performance objectives clearly and consistently should state specific, measurable, and deadline-sensitive achievements. In addition, relevant staff should be consulted in the development of goals within their areas of responsibility.

No fiscal impact is assumed for this recommendation because the district should conduct an assessment and develop a plan to improve the rigor and specificity of the DIP before a cost can be determined. Although DIP trainings will be necessary, the associated costs cannot be determined until the district identifies which trainings to attend.

ADDITIONAL OBSERVATIONS

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

COMMUNITY INVOLVEMENT

Although WOCCISD's processes for engaging families and the community are operating effectively, the district should develop or revise district-level strategies to improve efficiency and collaboration at the campus level.

Volunteer-management processes, such as soliciting, training, assigning, tracking, and recognizing volunteers, are campus-specific and lack consistency. The district requires background checks for all volunteers; however, campuses determine all other activities. During interviews, staff at all campuses reported a decrease in the number of parent and community volunteers since the COVID-19 pandemic. However, the district currently does not have formal procedures or processes to track the number of volunteers; therefore, precise data was not available to confirm or evaluate the changes. Establishing consistent volunteer procedures that all campuses follow would enable the district to better assess its volunteer needs and improve participation. The Texas PTA has established a guide for improving volunteer management at school districts. The guide recommends that districts take the following steps:

- assess volunteer needs at each campus;

- set expectations for volunteers;

- establish a process for recruiting volunteers;

- establish a process for training and orienting volunteers;

- establish a process for retaining and recognizing volunteers; and

- establish a process for evaluating volunteer performance and program success.

WOCCISD could improve its family and community engagement by establishing a districtwide volunteer management program for all campuses to follow.

Additionally, the district could adopt some of the activities suggested in the Texas Education Agency's Family Engagement Plan, which include evaluating engagement efforts for continuous improvement. Strategies and activities the district could adopt to better evaluate its community involvement processes include establishing engagement goals, gathering data, and surveying families annually about the effectiveness of the district's engagement strategies. By aggregating quantitative and qualitative engagement data at the district level, all the campuses can benefit collectively from each other's best practices and lessons learned.

In addition, WOCCISD staff reported that English learner (EL) students are a growing population, and the district has implemented several strategies to help meet these students' needs. However, support for communicating with the families of (EL) students remains fragmented. The district should develop clear procedures for securing interpreting services to better serve its growing Spanish-speaking population. By reducing language barriers between staff and families, the district will support community engagement further.

WEBSITE POSTINGS

WOCCISD does not have a comprehensive process for updating required postings and ensuring current information is available on the district's website. Although the chief communications officer is the primary manager of the district's website, each department and campus has at least one staff responsible for updating content related to that function.

A review of the district's website shows that not all campus and department web pages update required postings

consistently. For example, the West Orange-Stark Academic Alternative Center's campus web page lists the incorrect site coordinator; and the Performance Reports web page lists accountability ratings summary and Texas Academic Performance Reports inconsistently for each school year, and data descriptions have not been updated to show school year 2021–22 information.

Additionally, the page labeled Required Postings has outdated or missing information, such as its postings for district accountability, graduation endorsements, and student health. The responsibility for reviewing required postings is assigned to the director of federal programs, and the chief communications officer has not been tasked with ensuring that district and campus websites postings are up to date.

The superintendent should task the chief communications officer with maintaining and monitoring the required postings. The chief communications officer should perform the following actions:

- develop and periodically update a comprehensive checklist of required postings referenced in Board Policy CQA (LEGAL) in conjunction with the Texas Association of School Boards' Required and Optional Internet Postings resource; and

- develop a timeline for checking department and campus web pages for current and accurate information and required postings.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address the finding and observations.

2. EDUCATIONAL SERVICE DELIVERY

ACCOMPLISHMENTS

♦ West Orange-Cove Consolidated Independent School District (WOCCISD) has established and implemented a robust curriculum management plan.

♦ WOCCISD has implemented effective special education policies, procedures, and practices that align with best practices and requirements in state and federal statutes.

♦ WOCCISD's Career and Technical Education program offers various courses and certifications to meet students' diverse needs.

FINDINGS

♦ WOCCISD does not have a process to align its library operations with Texas State Library and Archives Commission standards.

♦ WOCCISD has not granted hiring and budget autonomy to the West Orange-Stark Early College High School (ECHS) coordinator in accordance with the Texas Education Agency's ECHS Blueprint, which undermines the research-based effectiveness of the model.

RECOMMENDATIONS

♦ **Recommendation 2: Conduct a comprehensive assessment of the district's library services to align its campus libraries' staffing, collections, and associated budgets with Texas State Library and Archives Commission standards.**

♦ **Recommendation 3: Grant hiring and budget authority to the West Orange-Stark Early College High School coordinator.**

BACKGROUND

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

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

WOCCISD has five campuses that include one elementary school, one middle school, one high school, an early learning center, and West Orange-Stark Academic Alternative Center, which houses the district's disciplinary alternative education program. The district's enrollment for school year 2021–22 was 2,555 students. **Figure 2–1** shows enrollment at each WOCCISD campus and the grade levels each serves.

Figure 2–2 shows the student demographics of WOCCISD compared to the student demographics of the state. For school year 2021–22, the district's student population was 54.1 percent African American, 21.6 percent Hispanic, 16.2 percent White, and less than 1.0 percent each for

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FIGURE 2–1
WEST ORANGE-COVE CONSOLIDATED ISD CAMPUSES AND ENROLLMENT
SCHOOL YEAR 2021–22

CAMPUS	GRADE LEVELS	ENROLLMENT
North Early Learning Center	Prekindergarten ages three and four	301
West Orange-Stark Elementary	Kindergarten to grade five	1,107
West Orange-Stark Middle School	Grades six to eight	517
West Orange-Stark High School	Grades nine to 12	630

NOTE: Disciplinary alternative education programs do not report enrollment. For reporting purposes, students assigned to West Orange-Stark Academic Alternative Center enroll in their locally assigned campuses.
SOURCE: Texas Education Agency, Public Education Information Management System Student Enrollment Report, school year 2021–22.

Asian, American Indian, Pacific Islander, and two or more races. The district has a higher percentage of students identified as economically disadvantaged compared to the state, but a lower percentage of students identified as English learners (EL).

Figure 2–3 shows WOCCISD's education service delivery organization.

As shown in **Figure 2–3**, educational service delivery duties are organized in a bifurcated reporting structure, with the assistant superintendent of curriculum and instruction and the assistant superintendent of student services reporting to the superintendent. Both assistant superintendents oversee their respective departments: Curriculum and Instruction and Student Services.

The Curriculum and Instruction Department includes a director of federal programs, a director of curriculum, and campus principals. The director of federal programs oversees programmatic requirements of several federal grants, including the Elementary and Secondary School Emergency Relief (ESSER) grants and entitlement programs pursuant to the Every Student Succeeds Act (e.g., Title I, Title II, etc.). The director's additional responsibilities include serving as the district coordinator of school improvement; the McKinney-Vento liaison, also known as the liaison for homeless students; the instructional materials coordinator; and the assessment coordinator for the district. The director

FIGURE 2–2
WEST ORANGE-COVE CONSOLIDATED ISD STUDENT DEMOGRAPHICS
**SCHOOL YEAR 2021–22**

STUDENTS	DISTRICT	STATE
African American	54.1%	12.8%
Hispanic	21.6%	52.8%
White	16.2%	26.3%
American Indian	0.2%	0.3%
Asian	0.4%	4.8%
Pacific Islander	0.2%	0.2%
Two or more races	7.3%	2.9%
Economically disadvantaged	90.5%	60.7%
English learners	7.4%	21.7%
At risk	55.9%	53.5%

NOTE: Totals may not sum to 100.0 percent due to rounding.
SOURCE: Texas Education Agency, Texas Performance Reporting System, school year 2021–22.

of curriculum provides support and guidance to campus staff on lesson planning and data disaggregation. Campus principals supervise the associate principals, assistant principals, instructional coaches, teachers, paraprofessionals, and library staff on their campuses.

The Curriculum and Instruction Department supports various online systems to guide curriculum development.

FIGURE 2–3
WEST ORANGE-COVE CONSOLIDATED ISD'S EDUCATION SERVICE DELIVERY ORGANIZATION, SCHOOL YEAR 2021–22
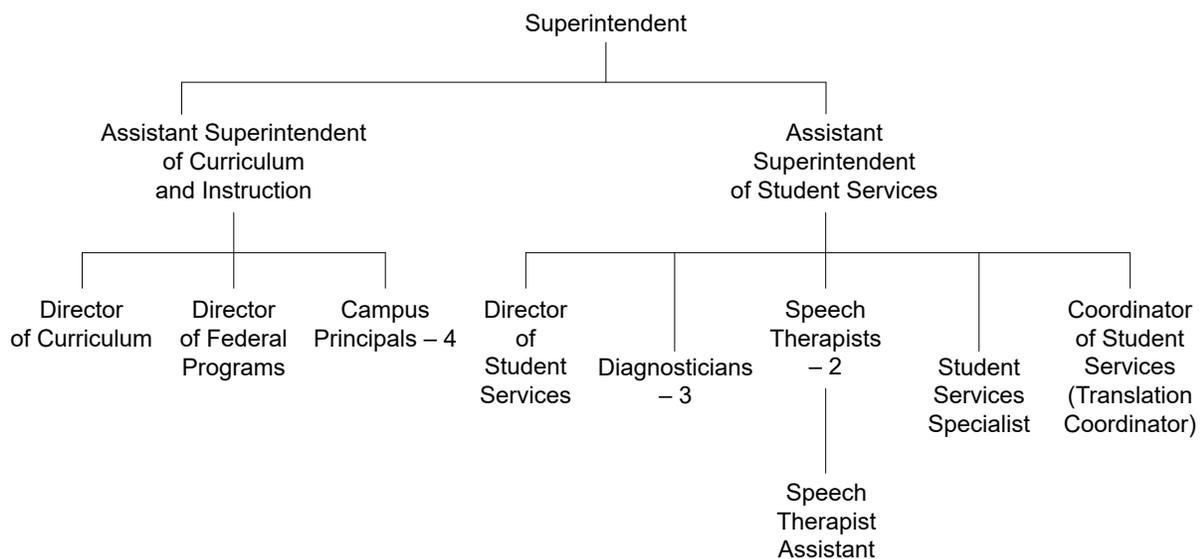
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

FIGURE 2–4
WEST ORANGE-COVE CONSOLIDATED ISD'S ACCOUNTABILITY RATINGS
SCHOOL YEARS 2016–17 TO 2021–22

DISTRICT/CAMPUS	2016–17	2017–18 (1)	2018–19	2019–20 AND 2020–21 (2)	2021–22
West Orange-Stark Elementary School	Improvement Required	Met Standard	D	Not Rated	Not Rated (4)
West Orange-Stark Middle School	Improvement Required	Not Rated (3)	F	Not Rated	B
West Orange-Stark High School	Improvement Required	Not Rated (3)	C	Not Rated	C
Districtwide	Met Standard	Not Rated (3)	C	Not Rated	B

NOTES:
(1)   The Legislature phased in a new accountability rating system for Texas public schools beginning in school year 2017–18, during which school districts received alphabetical ratings. Campuses received alphabetical ratings beginning in school year 2018–19.
(2)   Districts and campuses did not receive accountability ratings for school years 2019–20 and 2020–21 due to closures during the onset of the COVID-19 pandemic.
(3)   Districts that met criteria related to the effects of Hurricane Harvey and received a rating of Improvement Required were granted an accountability waiver for school year 2018–19.
(4)   Pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, districts and campuses that would have received a rating of D or F for school year 2021–22 are designated Not Rated.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2021–22.

For example, WOCCISD uses the TEKS Resource System, an online curriculum management system consisting of various tools, including Vertical Alignment Documents, which presents the expected progression of competencies and skills each year; Year at a Glance, which provides an overview of the organization and pacing for the year's instructional plan; the Instructional Focus Document, which is an organizational tool that articulates the details of each unit; and several other resources. The district also uses online learning platforms such as Imagine Learning, a literacy program intended to help early childhood education students, English learners, struggling readers, and students with disabilities; and Renaissance Learning, which includes computer-adapted assessments and its Accelerated Reader program, which is intended to encourage students to read.

Figure 2–4 shows WOCCISD's academic accountability ratings for school years 2016–17 to 2021–22. North Early Learning Center is not subject to state accountability, as it does not include tested grade levels.

Each year, the Texas Education Agency (TEA) issues academic accountability ratings to districts and campuses based on a 100-point scale scoring system, which equates to a designation ranging from A to F. West Orange-Stark Middle School improved its academic accountability score from 57 (F) in school year 2018–19 to 81 (B) in school year 2021–22. During the intervening school years, all districts and campuses received an accountability rating of Not Rated: Declared State of Disaster, related to the effects of the COVID-19 pandemic. The middle school's improvement represents a 42.1 percent growth in its accountability scores, which is especially noteworthy considering that the growth spanned the pandemic, a period marked by disrupted learning and subsequent declines in math and reading scores for students across the country.

The Student Services Department oversees programs for students entitled to services through gifted and talented education; special education; the federal Rehabilitation Act of 1973, Section 504 (Section 504); and Bilingual Education/English as a Second Language (ESL). The assistant superintendent of student services supervises the director of student services, the student service specialists, the coordinator of student services, diagnosticians, speech-language pathologists, and various student services contractors (e.g., physical therapists, occupational therapists). The director of student services manages the district's social–emotional learning programs, counseling services, Section 504 services, English learner programs, and gifted-and-talented services. In addition, the director serves as the district's foster care liaison and the coordinator of the academic alternative center.

For school year 2020–21, TEA issued WOCCISD a determination level of four, needs substantial intervention, for Bilingual Education/ESL and Emergent Bilingual Students, which is the highest determination level in TEA's Results Driven Accountability framework. School districts with this designation participate in ongoing

collaboration and progress monitoring with TEA and the regional education service centers to meet strategic support goals. This determination was related to the district's EL dropout rate of 10.0 percent in school year 2020–21, during which five students out of 50 dropped out. The district responded by implementing several data-driven systems to identify and support students at risk of dropping out. In addition, the district met its recruitment and retention goals for bilingual and ESL-certified teachers in school year 2022–23 to support its growing EL population.

DETAILED ACCOMPLISHMENTS

CURRICULUM MANAGEMENT

WOCCISD has established and implemented a robust curriculum management plan.

A school district's curriculum management plan establishes and communicates expectations for the structure, delivery, and evaluation of the district's curriculum. An effective plan requires coordination among district and campus staff to ensure the curriculum structure and delivery is consistent within each grade level (horizontal alignment) and from the end of one grade level to the beginning of the next grade level (vertical alignment). In addition, the plan must monitor curriculum delivery to ensure that it aligns with student assessments and meets or exceeds the Texas Essential Knowledge and Skills (TEKS) for the appropriate grade levels in the foundation and enrichment curriculum.

Staff reported that WOCCISD's curriculum development process begins each summer when select instructional staff develop pacing calendars and unit assessments for each subject. When time permits, the staff initiate lesson planning for the first six weeks of the school year.

Lesson planning is fundamental to effective curriculum management, as it provides an opportunity to affect all functions of the system: the structure, delivery, and evaluation of the curriculum. WOCCISD provides layers of support for lesson planning. District leadership developed a lesson-planning matrix to convey the performance expectations for components of a lesson plan. For example, a lesson plan must have a proficient student learning objective (SLO), which the matrix defines as clear, measurable, and aligned to the TEKS. Teachers submit lesson plans online where principals, associate principals, assistant principals, instructional coaches, or district leadership can provide feedback.

WOCCISD also implements walkthroughs to monitor and evaluate curriculum delivery. Principals, associate principals, assistant principals, instructional coaches, or district leadership conduct walkthroughs daily to provide regular feedback to teachers regarding their instructional practices and curriculum delivery. The curriculum and instruction leadership has implemented protocols for formal and informal assessments of instructional effectiveness, which are executed across all WOCCISD campuses.

WOCCISD also supports effective curriculum delivery and evaluation through professional learning communities (PLC). The district dedicates weekly common planning time for teachers to meet in PLCs that are organized by content areas or grade level to ensure the curriculum is horizontally aligned, to plan formative and summative assessments, to disaggregate data, and to determine the continuous progression of learning that must occur to foster long-term student success.

Research consistently has demonstrated that PLCs that engage in structured discussions that investigate relationships between instructional practices, student work, and learning outcomes produced the strongest gains in student learning. In a 2018 report in Educational Leadership, Jenni Donohoo, John Hattie, and Rachel Eells noted the critical importance of helping "educators make the link between their collective actions and student outcomes." During interviews, WOCCISD staff confirmed that the goals of their PLCs were aligned with this guidance.

Additionally, the district has a strong instructional coaching program at each of its campuses. Instructional coaches assist with classroom management, data disaggregation, and student interventions. They support the implementation of lesson planning, professional development, and the adopted curricula; and they monitor classroom instruction and provide feedback or model lessons to improve instructional practices. The implementation of this role in the district aligns with a 2018 examination of 60 studies conducted by researchers Matthew Kraft, David Blazar, and Dylan Hogan in *The Effect of Teacher Coaching on Instruction and Achievement: A Meta-analysis of the Causal Evidence*, which suggests that instructional coaching is one of the most positive school-based interventions.

In addition, the district collects, analyzes, and applies student data to inform its instructional practices. Each campus has a room for staff to post and analyze updated, high-level, and detailed student outcomes data. At WOCCISD, the goal of

improving a student's performance by 10 points, whether on a unit test or a benchmark assessment, is known as a "Plus 10 Goal." Staff reported that all students know their Plus 10 Goals in all subjects and assessments. District leadership has attributed districtwide academic growth to the implementation of Plus 10 Goals, as they are specific, measurable, and, most importantly, attainable for all students. By reviewing data frequently, teachers and administrators can evaluate progress and determine where progress is needed in the curriculum. The district's data-informed processes enable staff to evaluate the curriculum strategically on both an ad hoc and an annual basis.

SPECIAL EDUCATION SERVICES

WOCCISD has implemented effective special education policies, procedures, and practices that align with best practices and requirements in state and federal statutes.

Special education services must meet federal requirements to identify, evaluate, and educate students pursuant to the Individuals with Disabilities Education Act (IDEA) of 2004. The legislation's implementation in Texas was affected by corrective actions issued by the U.S. Department of Education (DOE) in 2018 in response to findings of noncompliance related to response to intervention (RTI) and dyslexia services.

Specifically, the DOE affirmed that a school district's RTI strategy must not result in the delay or denial of evaluations for students suspected of having a disability who need special education and related services. RTI is a three-tier model of campus support that uses research-based academic and behavioral interventions for students with learning and behavioral needs. Additionally, the DOE maintained that districts must perform the following services: (1) consider dyslexia to be a condition that could qualify as a specific learning disability pursuant to IDEA, which offers specific educational benefits; and (2) must not serve students with dyslexia exclusively in accordance with Section 504, which, unlike IDEA, is a civil rights law. WOCCISD has integrated this guidance effectively into its existing student services procedures.

For example, the district has strong RTI systems in place. West Orange-Stark Elementary School's intervention team consists of one teacher and two paraprofessionals who provide data-driven, small-group and individualized instruction. In addition, WOCCISD strengthened its RTI process by requiring teachers to include intervention strategies in submitted lesson plans for identified students.

Additionally, pursuant to House Bill 4545, Eighty-seventh Legislature, Regular Session, 2021, identified students at all WOCCISD campuses receive supplemental small-group instruction during the school day. Notably, West Orange-Stark Middle School achieved national recognition for its use of Imagine Learning, a component of its supplemental small-group instruction.

The district also prioritizes informing staff that, although the data collected by teachers and interventionists could be used in a full and individual initial evaluation (FIIE) pursuant to IDEA, the RTI data collection or instructional delivery process must not delay or deny an FIIE. Staff at all levels of the referral and evaluation process reported that the needs of the student and the requirements of IDEA dictated whether a child is determined to have a specific learning disability, independent of the RTI intervention status or timelines.

The district also provides quality services for students diagnosed with dyslexia. TEA's *The Dyslexia Handbook: Procedures Concerning Dyslexia and Related Disorders* provides guidelines for Texas school districts as they identify and provide services for students with dyslexia. WOCCISD staff met the *Dyslexia Handbook* standards and exceeded certain requirements. For example, in anticipation of updated evaluation requirements for students suspected of having dyslexia, the district cross-trained the elementary diagnostician and the dyslexia specialist to learn aspects of each other's duties relevant to this activity.

Through onsite observations and interviews, Student Services Department staff reported that they had strong systems in place, felt well-supported, and were well-trained.

CAREER AND TECHNICAL EDUCATION

WOCCISD's Career and Technical Education (CTE) program offers various courses and certifications to meet students' diverse needs.

The district's CTE course offerings align with student interest and high-skill, high-wage, and in-demand occupations. In addition, the program is well-integrated with the community.

Figure 2–5 shows the programs of study offered by WOCCISD's CTE program.

The district, in partnership with Lamar State College – Orange, also offers five industry-based certifications to its students, including Adobe Certified Professional and American Welding Society Certified Welder. A certification is a portable validation or license that indicates an individual

FIGURE 2–5
WEST ORANGE-COVE CONSOLIDATED ISD'S CAREER AND TECHNICAL EDUCATION COURSE OFFERINGS
SCHOOL YEAR 2022–23

PROGRAM	COURSES	PROGRAM	COURSES
Architecture and Construction	4	Law and Public Service	6
Arts, Audio/Video Technology and Communications	8	Manufacturing	7
Business, Marketing, and Finance	5	Science, Technology, Engineering, and Mathematics	4
Education and Training	3	Transportation, Distribution and Logistics	5
Health Science	4		

SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

possesses certain industry-specific skills that met the certifying entity's standard.

These course offerings, certifications, and dual-credit opportunities have enabled WOCCISD to raise the College, Career, and Military Readiness (CCMR) component score of the district's accountability rating. From school years 2020–21 to 2021–22, the district's CCMR raw component score increased by 16.1 percent, from a score of 56 to a score of 65. Although staff noted that the accountability rating increase was due in part to stronger Public Education Information Management System (PEIMS) reporting systems, the districts' actual college and career readiness gains were due to its CTE program growth.

In accordance with the federal Strengthening Career and Technical Education for the 21st Century Act, known as Perkins V, the district annually evaluates its CTE program. Through the evaluation process, WOCCISD has expanded its course offerings to align with local industry demands and student interests. In addition, the district has begun to serve the community through its CTE courses. For example, residents can bring in items to welding students for repair and they can receive select services from cosmetology students. By engaging with the community and advertising the CTE program, the district has increased the program's enrollment.

Figure 2–6 shows the percentage of annual graduates from WOCCISD and from all of Texas who were enrolled in a coherent sequence of CTE courses as part of a four-year plan of study. The district's percentage of coherent sequence annual graduates consistently exceeded the state's percentage.

By implementing a comprehensive CTE program, WOCCISD is providing students with expanded learning and career opportunities.

FIGURE 2–6
COHERENT SEQUENCE ANNUAL GRADUATES FROM WEST ORANGE-COVE CONSOLIDATED ISD AND TEXAS SCHOOL YEARS 2016–17 TO 2019–20

YEAR	WOCCISD	STATE
2016–17	76.7%	50.5%
2017–18	71.9%	58.4%
2018–19	76.4%	59.0%
2019–20	80.9%	58.5%

NOTES:
(1) Data shows the percentage of annual graduates enrolled in a coherent sequence of career and technical education courses.
(2) Graduate information is a lagging indicator, meaning the school year is one behind the reporting year.
(3) Coherent sequence data was not collected after school year 2020–21.
SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Texas Academic Performance Report, school years 2017–18 to 2020–21.

DETAILED FINDINGS

LIBRARY SERVICES (REC. 2)

WOCCISD does not have a process to align its library operations with Texas State Library and Archives Commission standards.

The district's four libraries are housed at the North Early Learning Center, the West Orange-Stark Elementary School, the West Orange-Stark Middle School, and the West Orange-Stark High School. This analysis concerns only elementary, middle-school, and high-school libraries for which the Texas State Library and Archives Commission (TSLAC) adopts standards, in consultation with the Texas State Board of Education.

TSLAC's *School Library Programs: Standards and Guidelines for Texas* (2018) provides a framework for self-assessment and strategic planning. Pursuant to the Texas Education Code,

FIGURE 2–7
WEST ORANGE-COVE CONSOLIDATED ISD'S LIBRARY RESOURCE (1) BUDGET COMPARED TO TSLAC STANDARDS
FISCAL YEAR 2022–23

WEST ORANGE-COVE CONSOLIDATED ISD			TEXAS STATE LIBRARY AND ARCHIVES COMMISSION STANDARDS				
CAMPUS	ADA (2)	RESOURCE BUDGET	DISTINGUISHED	ACCOMPLISHED	PROFICIENT	DEVELOPING	IMPROVEMENT NEEDED
West Orange-Stark Elementary School	1,052	$4,000	$21,040	$16,832	$12,624	$8,416	$6,312
West Orange-Stark Middle School	492	$0	$9,840	$7,872	$5,904	$3,936	$2,952
West Orange-Stark High School	601	$3,000	$12,020	$9,616	$7,212	$4,808	$3,606

NOTES:
(1) Resources=budget for print and digital materials, not operational expenditures.
(2) Average daily attendance (ADA) was estimated by multiplying the 2021-22 Texas Academic Performance Report total students by 95.0 percent. Texas State Library and Archives Commission (TSLAC) standards for the budget are based on ADA.
SOURCES: Texas Education Agency, Texas Academic Performance Report, 2021-22; Texas State Library and Archives Commission, *School Library Programs: Standards and Guidelines for Texas*, 2018.

Section 33.021, the standards are recommended, not mandated. However, House Bill 900, Eighty-eighth Legislature, Regular Session, 2023, known as the Restricting Explicit and Adult-Designated Educational Resources Act, did amend this section of the code to require school districts to adhere to collection development standards that TSLAC, in consultation with the Texas State Board of Education, will be required to adopt by January 1, 2024.

All other TSLAC standards are designed for a school district to consider when developing, implementing, or expanding its library services. The TSLAC *Standards and Guidelines* define six components of an effective school library program. The standards provide performance metrics for each component that enable districts to evaluate their campus libraries as Distinguished, Accomplished, Proficient, Developing, or Improvement Needed.

Based on the TSLAC *Standards and Guidelines*, WOCCISD's libraries were operating effectively in several areas. For example, based on the review team's observations and staff interviews, campus libraries would meet the Distinguished criteria for offering a safe and nurturing environment that cultivates a sense of community and respect. Additionally, WOCCISD staff expressed positive opinions about the campuses' library environment, services, and staff. Furthermore, WOCCISD leadership noted that the district also provides books to students through classroom libraries and hallway libraries that are organized by genre. However, an assessment of the campus libraries' metrics shows that several are operating at the Improvement Needed designation in the areas of resource budgeting, staffing ratios, and collections.

Figure 2–7 shows the campus library's fiscal year 2022–23 budget for resources and TSLAC budget standards for each designation. TSLAC library resource budget standards are based on the average daily attendance (ADA) of the campus. The actual library resource budget typically is at the discretion of the campus principal, based on appropriated funding approved by the Board of Trustees. An analysis of WOCCISD's campus library resources allocation in fiscal year 2022–23 shows that all libraries' budgets were less than TSLAC's lowest threshold for school library resources. A Distinguished resource budget would be equal to the district's ADA multiplied by $20; an Accomplished resource budget is ADA multiplied by $16; a Proficient resource budget is ADA multiplied by $12; a Developing resource budget is ADA multiplied by $8; and an Improvement Needed resource budget is ADA multiplied by $6.

Staff reported that the campus libraries' annual budget preparation process does not evaluate gaps in library resources. The amount that each campus allocates for library resources was determined exclusively at the discretion of campus principals, sometimes without consulting library staff regarding needs or data. The amount that was allocated for library resources varied across campuses during fiscal year 2022–23, as shown in **Figure 2–7**.

West Orange-Stark Elementary School has the largest enrollment and ADA among the campuses, and its library had the largest resources budget, totaling $4,000. However, this amount equates to 63.3 percent of the Improvement

FIGURE 2–8
TEXAS STATE LIBRARY AND ARCHIVES COMMISSION'S PUBLIC SCHOOL LIBRARY STAFFING STANDARDS, 2018

ELEMENTARY STANDARDS					
AVERAGE DAILY ATTENDANCE	**DISTINGUISHED (MINIMUM)**	**ACCOMPLISHED (MINIMUM)**	**PROFICIENT (MINIMUM)**	**DEVELOPING (MINIMUM)**	**IMPROVEMENT NEEDED**
250–500	1.0 certified librarian position; 1.0 staff position	1.0 certified librarian position; 0.5 staff position	0.5 certified librarian position; 0.5 staff position	0.5 certified librarian position; 0.5 staff position	no certified librarian; no staff
501–1,000	1.0 certified librarian position; 1.5 staff positions	1.0 certified librarian position; 1.25 staff positions	1.0 certified librarian position; 1.0 staff position	1.0 certified librarian position; 0.5 staff position	0.5 certified librarian position; 0.5 staff position
Greater than 1,000	2.0 certified librarian positions; 2.0 staff positions	1.5 certified librarian positions; 2.0 staff positions	1.25 certified librarian positions; 1.0 staff positions	1.0 certified librarian position; 1.0 staff position	0.5 certified librarian position; 0.5 staff position
SECONDARY STANDARDS					
AVERAGE DAILY ATTENDANCE	**DISTINGUISHED (MINIMUM)**	**ACCOMPLISHED (MINIMUM)**	**PROFICIENT (MINIMUM)**	**DEVELOPING (MINIMUM)**	**IMPROVEMENT NEEDED**
250–750	1.0 certified librarian position; 1.5 staff positions	1.0 certified librarian position; 1.25 staff positions	1.0 certified librarian position; 1.0 staff position	0.5 certified librarian position; 0.5 staff position	no certified librarian; no staff
751–1,200	1.0 certified librarian position; 2.0 staff positions	1.0 certified librarian position; 1.75 staff positions	1.0 certified librarian position; 1.5 staff positions	1.0 certified librarian position; 1.0 staff position	0.5 certified librarian position; 0.5 staff position
1,200–2,000	1.0 certified librarian position; 2.0 staff positions	1.0 certified librarian position; 2.0 staff positions	1.0 certified librarian position; 2.0 staff positions	1.0 certified librarian position; 2.0 staff positions	0.5 certified librarian position; 1.0 staff position
Greater than 2,000	2.0 certified librarian positions; 3.0 staff positions	2.0 certified librarian positions; 2.5 staff positions	2.0 certified librarian positions; 2.0 staff positions	2.0 certified librarian positions; 2.0 staff positions	1.0 certified librarian position; 1.0 staff position

SOURCE: Texas State Library and Archives Commission, *School Library Programs: Standards and Guidelines for Texas*, 2018.

Needed budget standard, and 31.7 percent of the Proficient budget standard. Staff reported that the West Orange-Stark Middle School library received an operational budget for supplies, but not a resource budget for print and digital materials. The West Orange-Stark High School library budget of $3,000 is equivalent to 83.2 percent of the TSLAC Improvement Needed standard.

Staff reported that campus libraries were able to purchase books, even with little to no budget allocation, by relying on library fundraising efforts, most notably through book fair programs in association with the Scholastic Corporation educational publishing company. Some staff offered the opinion that they might not have received priority for funding because leadership believed that the library instead could generate revenue through these fundraising opportunities. However, staff report preferring to use fundraising money on activities and resources that encourage students to read independently, such as providing prizes and parties for students who meet their reading goals.

WOCCISD's campus libraries also did not meet TSLAC's school library staffing standards. **Figure 2–8** shows TSLAC standards for staffing.

Figure 2–9 shows WOCCISD's library staff for school year 2022–23.

According to TSLAC guidelines, all campuses, regardless of the number of students in attendance, must have on staff either 1.0 certified librarian position or 0.5 (i.e., part-time or shared) certified librarian position to meet any standard higher than Improvement Needed. West Orange-Stark High School has a certified librarian and a full-time paraprofessional and meets TSLAC's Proficient standard. The other WOCCISD campus libraries do not have certified librarians on staff and are designated Improvement Needed by TSLAC standards. The West Orange-Stark Elementary School library staff include a full-time paraprofessional and a media specialist, who is a certified teacher. The West Orange-Stark Middle School library is staffed by a full-time paraprofessional.

FIGURE 2–9
WEST ORANGE-COVE CONSOLIDATED ISD'S CAMPUS LIBRARY STAFFING COMPARED TO STATE STANDARD
SCHOOL YEAR 2022–23

CAMPUS	ADA (1)	CERTIFIED LIBRARIANS	LIBRARY STAFF	TSLAC STANDARD
West Orange-Stark Elementary School	1,052	0.0 positions	2.0 positions	Improvement Needed
West Orange-Stark Middle School	492	0.0 positions	1.0 position	Improvement Needed
West Orange-Stark High School	601	1.0 position	1.0 position	Proficient

NOTE: (1) Average daily attendance (ADA) was estimated by multiplying the 2021-22 Texas Academic Performance Report total students by 95.0 percent. Texas State Library and Archives Commission (TSLAC) standards for staffing are based on ADA and campus type.
SOURCES: Texas Education Agency, Texas Academic Performance Report, 2021-22; Texas State Library and Archives Commission, *School Library Programs: Standards and Guidelines for Texas*, 2018.

FIGURE 2–10
TEXAS STATE LIBRARY AND ARCHIVES COMMISSION STANDARDS FOR SCHOOL LIBRARY COLLECTION SIZE AND AGE, 2018

COLLECTION SIZE FOR ELEMENTARY SCHOOLS				
DISTINGUISHED	ACCOMPLISHED	PROFICIENT	DEVELOPING	IMPROVEMENT NEEDED
15,000 print or 18 books per student whichever is greater	13,000 print or 16 books per student whichever is greater	11,000 print or 14 books per student whichever is greater	9,000 print or 12 books per student whichever is greater	Less than 7,000 books or fewer than 12 books per student, whichever is greater

COLLECTION SIZE FOR SECONDARY SCHOOLS				
DISTINGUISHED	ACCOMPLISHED	PROFICIENT	DEVELOPING	IMPROVEMENT NEEDED
13,000 print or 16 books per student whichever is greater	12,000 print or 14 books per student whichever is greater	10,000 print or 12 books per student whichever is greater	8,000 print or 10 books per student whichever is greater	Less than 8,000 books or fewer than 10 books per student, whichever is greater

COLLECTION AGE				
DISTINGUISHED	ACCOMPLISHED	PROFICIENT	DEVELOPING	IMPROVEMENT NEEDED
Average copyright date of 10 years or less	Average copyright date of 12 years or less	Average copyright date of 14 years or less	Average copyright date of 16 years or less	Average copyright date is more than 16 years

SOURCE: Texas State Library and Archives Commission, *School Library Programs: Standards and Guidelines for Texas*, 2018.

Additionally, several WOCCISD campus libraries are classified as Improvement Needed based on the number of books per student in their collections and the age of their collections. **Figure 2–10** shows TSLAC standards for these two areas.

Figure 2–11 shows WOCCISD's books-per-student count and collection age at each campus library for school year 2022–23. The number of books per student varies significantly across the district, but all WOCCISD's library collections are aging or outdated.

As shown in **Figure 2–11**, the number of books per student ranges from 4 in the middle school library to 20 in the elementary and high school libraries. The West Orange-Stark Elementary School and High School libraries meet TSLAC's standard for Distinguished collections of print materials;

meanwhile, the West Orange-Stark Middle School library collection is designated Improvement Needed, with 2,122 books in circulation. The exact number of digital resources per campus was not available as of October 2022; however, staff noted that campus leadership prioritizes digital books over print books in the middle school. Although digital resources have become indispensable to modern schools, particularly during the COVID-19 pandemic, TSLAC standards currently maintain the primacy of print books, recommending a ratio of 80.0 percent print to 20.0 percent digital in a Distinguished elementary library and 60.0 percent print to 40.0 percent digital in a Distinguished secondary library.

The average collection ages at all three campus libraries are in TSLAC's category Improvement Needed. Staff reported that West Orange-Stark High School plans to remove many of the

FIGURE 2–11
WEST ORANGE-COVE CONSOLIDATED ISD LIBRARY COLLECTION SIZE AND AGE COMPARED TO TEXAS STATE LIBRARY AND ARCHIVES COMMISSION STANDARDS, SCHOOL YEAR 2022–23

CAMPUS	ENROLLMENT	COLLECTION	BOOKS PER STUDENT	TSLAC COLLECTION SIZE STANDARD	AVERAGE COLLECTION AGE	TSLAC COLLECTION AGE STANDARD
West Orange-Stark Elementary School	1,107	22,473	20	Distinguished	1994 (28 years)	Improvement Needed
West Orange-Stark Middle School	518	2,122	4	Improvement Needed	2001 (21 years)	Improvement Needed
West Orange-Stark High School	633	12,662	20	Distinguished	1989 (33 years)	Improvement Needed

SOURCES: Texas Education Agency, Texas Academic Performance Report, 2021-22; Texas State Library and Archives Commission (TSLAC), *School Library Programs: Standards and Guidelines for Texas*, 2018.

older books and purchase new materials after renovations to the library are completed during school year 2022–23. At the time of the onsite visit, the high school library's collection is the oldest among WOCCISD campuses, with an average copyright date of 33 years. West Orange-Stark Middle School's collection has an average copyright date of 21 years. West Orange-Stark Elementary School's collection age averages 28 years.

Research has shown that effective school library programs can be correlated positively with student achievement. Keith Curry Lance and Bill Schwarz analyzed library staffing, spending, and collections in the 2012 study *How Pennsylvania School Libraries Pay Off: Investments in Student Achievement and Academic Standards*. The analysis found that "almost eight percent more students score Advanced in Reading [on state assessments] where students have a full-time, certified librarian than where they do not." In addition, students were two-and-one-half times as likely to score Advanced in Writing on a state assessment at schools with a certified librarian on staff. For students in the study who were Black and Hispanic, access to at least 12,000 books more than doubled their chances of achieving Advanced Writing scores. The research also showed that the relationship between library collection size and higher assessment scores grows stronger with advancing grade levels.

WOCCISD should conduct a comprehensive assessment of the district's library services to align its campus libraries' staffing, collections, and associated budgets with TSLAC standards.

The assistant superintendent of curriculum, in coordination with the high school librarian, should conduct an annual review of each campus' staffing levels, budgets, and collection age to ensure that they are equitable and meet student needs. The district should work toward meeting at least the TSLAC standard for Proficient staffing, budget, and collection age at each library.

The district should consider hiring a certified librarian at the West Orange-Stark Middle School campus. In addition, the district should consider tuition reimbursement or other incentives for the elementary school librarian to become a certified librarian.

To address the collection age, the high school librarian should collaborate with campus library staff to adopt and implement a recognized process of regularly removing outdated or irrelevant library resources, referred to as a weeding process; these practices can be evaluated annually at the district level by reviewing collection age and the items removed from circulation. TSLAC provides guidelines for reevaluating and removing library materials in *Continuous Review, Evaluation, and Weeding: Weeding Manual for Modern Libraries* (2021).

The assistant superintendent of curriculum and instruction should collaborate with the middle school principal, the middle school library staff, and the high school librarian to develop a plan and budget to address the inequitable book-to-student ratio at the middle school campus. Initially, the West Orange-Stark Middle School should consider a resource budget of twice the Proficient level of TSLAC standards to address the disparity in the collection sizes. This budget allocation may need to be repeated in subsequent years until leadership believes the resource gap has been addressed sufficiently.

WOCCISD leadership noted that the district has invested more than $100,000 in classroom libraries and hallway libraries for students, with nearly $75,000 of the investment going to the elementary school, whose campus library collection meets the Distinguished standard. The superintendent of curriculum and instruction should collaborate with the middle school and high school library staff on future investments in classroom and hallway libraries. In addition, WOCCISD should consider placing the hallway libraries under the campus library system.

No fiscal impact is assumed for this recommendation as the district first should conduct an assessment and develop a plan for the operation of the district's libraries before determining a cost. **Figure 2–12** shows an example of a library operations plan and corresponding budget changes. Based on the district's assessment, the assigned staff should set library service priorities, estimate the budget effect of those priorities, and incorporate these factors into future budget cycles.

EARLY COLLEGE HIGH SCHOOL (REC. 3)

WOCCISD has not granted hiring and budget autonomy to the West Orange-Stark Early College High School (ECHS) coordinator in accordance with TEA's ECHS Blueprint, which undermines the research-based effectiveness of the model.

ECHS campuses are designated annually by TEA. An ECHS is designed to allow students least likely to attend college an opportunity to receive both a high school diploma and either an associate degree or at least 60.0 credit hours toward a baccalaureate degree, pursuant to the Texas Education Code, Section 29.908(b)(2). ECHS designation is possible after campuses complete a planning year, demonstrate compliance with the six benchmarks in the ECHS Blueprint, operate provisionally for four years, and meet certain outcomes-based measures.

FIGURE 2–12
RECOMMENDED CHANGES IN WEST ORANGE-COVE CONSOLIDATED ISD LIBRARY OPERATIONS OCTOBER 2022

CAMPUS	RECOMMENDATION	COST
West Orange-Stark Middle School	1.0 certified librarian position (salary and benefits)	$60,000 (1)
West Orange-Stark Elementary School	Library resources	$8,624 (2)
West Orange-Stark Middle School	Library resources	$11,808 (3)
West Orange-Stark High School	Library resources	$4,212 (2)
Total		**$84,644**

NOTES:
(1) Assuming benefits costs equal to 20.0 percent of salary.
(2) Expenditures toward this recommendation would bring the campus's budget to the Texas State Library and Archives Commission's budget standard of Proficient.
(3) Expenditures toward this recommendation would be double the Texas State Library and Archives Commission's budget standard of Proficient.
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

The benchmarks are research-based and critical to positive outcomes for ECHS students. **Figure 2–13** shows the ECHS Blueprint Benchmarks.

FIGURE 2–13
TEXAS EDUCATION AGENCY'S EARLY COLLEGE HIGH SCHOOL BLUEPRINT BENCHMARKS, 2020

BENCHMARK	REQUIREMENTS
1. Target Population	The Early College High School (ECHS) shall serve, or include plans to scale up to serve, students in grades 9 through 12, and shall target and enroll students who are at risk of dropping out of school as defined by statute (the Texas Education Code, §29.908) and the Public Education Information Management System (PEIMS) and who might not otherwise go to college.
2. Partnership Agreement	The ECHS shall have a current, signed memorandum of understanding or interlocal agreement for each school year that defines the partnership between the school district(s) and the institution(s) of higher education and addresses required topics.
3. P–16 (1) Leadership Initiatives	The school district and institution(s) of higher education partners shall develop and maintain a leadership team that meets regularly to address issues of design, implementation, and sustainability.
4. Curriculum and Support	The ECHS shall provide a course of study that enables participating students the opportunity to complete high school graduation requirements and earn an associate degree or at least 60.0 semester credit hours toward a baccalaureate degree, with the opportunity to complete the Texas Higher Education Coordinating Board's (THECB) core curriculum (as defined by 19 Texas Administrative Code §4.28), and pathways to obtain certifications. The ECHS shall provide students with academic, social, and emotional support in their course of study.
5. Academic Rigor and Readiness	The ECHS shall administer a Texas Success Initiative college placement exam (as defined by the 19 Texas Administrative Code, §4.53) to all accepted ECHS students to assess college readiness, design individual instructional support plans, and enable students to begin college courses based on their performance on the exam.
6. School Design	The ECHS must provide a full-day program (i.e., a full day as defined in PEIMS) at an autonomous high school (i.e., a high school with an ECHS leader assigned to ECHS responsibilities who has scheduling, hiring, and budget authority), an institution of higher education liaison who has decision-making authority, and a highly qualified staff with support and training.

NOTES: P–16=Preschool through college completion. This term describes the goal of developing a public education system that begins with access to early learning opportunities and culminates in a baccalaureate degree.
SOURCES: Legislative Budget Board School Performance Review Team, October 2022; Texas Education Agency, 2020.

The ECHS model is backed by more than a decade of research by the American Institutes for Research (AIR). AIR's 2014 *Initiative Impact Study* results were validated in the 2019 *Cost and Benefits of ECHS* report, which found that ECHS students were "significantly more likely to enroll in college and earn a college degree than students in a comparison group with similar characteristics who were not enrolled in Early Colleges."

West Orange-Stark Early College High School closely follows most aspects of the ECHS Blueprint. For example, 90.5 percent of WOCCISD's student population is categorized as economically disadvantaged, which means almost all students in the district are part of a defined target population for the ECHS program (i.e., students who historically are underrepresented in college courses). Nonetheless, the district has implemented a weighted lottery to ensure that its ECHS enrollment process is performance-blind and favors students who are at risk or who are part of historically underrepresented subpopulations targeted by the program (e.g., first-generation college enrollees, ELs, students with disabilities). In addition, the district has developed and maintained a strong partnership with Lamar State College – Orange through its ECHS and CTE programs. Since its inception, the district's ECHS program has graduated two cohorts, both of which included students who also completed associate degrees.

West Orange-Stark Early College High School enrolls a cohort of 25 students each year, with a total enrollment of 100 students in the program. The ECHS operates a smaller learning community within the West Orange-Stark High School, under the leadership of the ECHS coordinator. In this model, the TEA Blueprint is clear that the ECHS coordinator must have autonomy for course and instructor scheduling, staff and faculty hiring, and budget development.

During interviews, staff could not assert with confidence that the ECHS coordinator had unambiguous authority to make such decisions, which suggests that the district's model is not aligned properly with the standards outlined in the TEA guidance. In fact, district leadership confirmed that the associate principal, rather than the ECHS coordinator, has hiring, budgeting, and scheduling authority.

In an interview, the ECHS coordinator discussed priorities for improving the ECHS program, such as hiring additional ECHS facilitators to support the students academically in their course of study. Additional facilitators could help reduce the number of ECHS students who are placed on an intervention plan due to low performance and increase the

number of students who graduate high school with an associate degree. In addition, the coordinator discussed adding a second associate degree option for students to pursue. Finally, the coordinator expressed interest in expanding the program to accommodate an additional 10 to 15 students per cohort, because demand for the program currently exceeds available space.

The autonomy of the leader is imperative to the model's success because, according to a 2018 report by the American Institute of Research, *Dual Credit Education Programs in Texas*, "low-income students and students of color benefitted less from dual credit education delivered in traditional high school settings when compared with affluent and white students," due to disparities in access to quality advising and support. This research supports the TEA Blueprint's Benchmark 4, which requires the provision of academic, social, and emotional support for ECHS students in their course of study. To fully meet the needs of ECHS students, especially those who often face barriers to participation in higher education, the coordinator must have the authority to provide appropriate support in a timely manner.

In addition to reduced outcomes, students who participate in dual-credit programs without appropriate support may encounter financial obstacles to completing postsecondary education. Federal student aid guidelines grant discretion to institutions of higher education to consider dual-credit coursework toward satisfactory academic progress (SAP), which is required to receive grants, loans, or work-study funds. An institution of higher education's SAP policy is required to be at least as strict as federal guidelines, which require a 66.7 percent pass-and-completion rate with a minimum 2.0 grade-point average, the equivalent of an average grade of C. A student enrolled in dual-credit courses may become ineligible for federal student aid based on course failures, dropped courses, or earning passing grades that are too low (i.e., a grade of D) from ECHS courses.

An ECHS should offer sufficient support to help students exceed these threshold measures and maintain their financial aid eligibility. By meeting or exceeding academic progress requirements, students will be assured access to grants, loans, and work-study opportunities that may enable them to pursue additional postsecondary courses.

Figure 2–14 shows the SAP requirements of a sample of institutions of higher education in Texas. The institutions consistently maintain the requirement of a grade-C average but vary slightly in their pace requirements.

WOCCISD should grant hiring and budget authority to the West Orange-Stark Early College High School coordinator.

The ECHS coordinator should attend district leadership and budget development meetings. The deputy superintendent and chief financial officer, respectively, should arrange for the coordinator to receive training on hiring policies and campus and district budgeting processes. In addition, the superintendent must ensure the coordinator's hiring and budget recommendations are considered for implementation at least annually, especially as they concern student support services.

Additionally, the ECHS coordinator should conduct an annual, comprehensive assessment of student needs and services, the risks and benefits of expanding the ECHS program, and the course of study (e.g., Lamar State College – Orange crosswalk). Based on the comprehensive assessments, the coordinator should make recommendations to the superintendent annually regarding courses and instructor scheduling, staff and faculty hiring, and budget development.

No fiscal impact is assumed for this recommendation, as the district first should conduct an assessment and develop a plan for the operation of the West Orange-Stark ECHS courses and instructor scheduling, staff and faculty hiring, and budget development.

ADDITIONAL OBSERVATIONS

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

EARLY LEARNING SUPPORT

The district should prioritize behavioral and academic support for early learners at West Orange-Stark Elementary School.

WOCCISD serves a large population of economically disadvantaged students. Several studies have correlated economically disadvantaged status with reduced academic outcomes. In a 2019 study, *Poverty and Early Childhood Outcomes*, the American Academy of Pediatrics found that children born into poverty were less likely to be ready for school than their peers. The study found that poverty limits children's access to opportunities that prepare them for learning (e.g., access to books, high-quality preschool) and can expose children to several risk factors for poor developmental outcomes, such as hospitalizations and child protective services interventions such as placement in out-of-

FIGURE 2–14
SATISFACTORY ACADEMIC PROGRESS AT TEXAS INSTITUTIONS OF HIGHER EDUCATION, OCTOBER 2022

COLLEGE	MINIMUM GPA (1)	MINIMUM PACE (2)
Lamar State College – Orange	2.0	70.0%
Texas A&M University at College Station	2.0	75.0%
Texas Southern University	2.0	67.0%
University of Houston	2.0	67.0%

NOTES:
(1) GPA=grade-point average.
(2) Minimum pace is the rate at which a student must complete or pass courses successfully according to the institution's requirements.
SOURCES: Legislative Budget Board School Performance Review Team, October 2022; Lamar State College – Orange; Texas A&M University; Texas Southern University; University of Houston.

FIGURE 2–15
PERCENTAGE OF ECONOMICALLY DISADVANTAGED STUDENT, SCHOOL YEARS 2017–18 TO 2021–22

YEAR	WEST ORANGE-STARK ELEMENTARY SCHOOL	DISTRICT	STATE
2017–18	85.3%	88.7%	58.8%
2018–19	67.7%	73.5%	60.6%
2019–20	83.2%	84.2%	60.3%
2020–21	90.5%	89.8%	60.3%
2021–22	91.4%	90.5%	60.7%

SOURCE: Texas Education Agency, Texas Academic Performance Report 2017–18 to 2021–22.

home care. In other words, what looks like an achievement gap is rooted in an opportunity gap.

Considering the research on the school-readiness effects of socioeconomic status, the district should consider how these factors intersect in WOCCISD. **Figure 2–15** shows the percentage of economically disadvantaged students at West Orange-Stark Elementary School and WOCCISD compared to the percentage in the state from school years 2017–18 to 2021–22.

In Texas, school readiness is determined through a commissioner-selected kindergarten entry assessment administered by teachers at the beginning of the school year. The assessment helps schools determine whether students have mastered developmental benchmarks aligned with the Texas Prekindergarten Guidelines and the TEKS. **Figure 2–16** shows WOCCISD's kindergarten readiness assessment outcomes compared to statewide outcomes.

FIGURE 2–16
WEST ORANGE-COVE CONSOLIDATED ISD AND TEXAS STUDENTS ASSESSED AS READY FOR KINDERGARTEN
SCHOOL YEARS 2018–19 TO 2021–22

YEAR	WOCCISD – ALL	STATE – ALL	STATE, ECONOMICALLY DISADVANTAGED	WOCCISD, ATTENDED PREKINDERGARTEN (1)	STATE, ATTENDED PREKINDERGARTEN (1)	STATE, ECONOMICALLY DISADVANTAGED AND ATTENDED PREKINDERGARTEN (1)
2018–19	39.0%	52.3%	45.6%	(3)	56.5%	53.7%
2019–20	16.8%	53.0%	46.3%	17.9%	56.6%	53.9%
2020–21	(2)	62.2%	55.6%	(2)	64.6%	61.6%
2021–22	18.1%	58.4%	51.2%	25.0%	68.9%	65.3%

NOTES:
(1)   Kindergarten students who attended Texas public prekindergarten during the previous year for 80 or more days.
(2)   Texas public kindergarten readiness data are not available for West Orange-Cove Consolidated ISD (WOCCISD) for school year 2020–21.
(3)   Data are masked to protect the confidentiality of student data.
SOURCE: Texas P–16 Public Education Information Resource, 2018 to 2022.

As shown in **Figure 2–16**, 18.1 percent of West Orange-Stark kindergarten students were assessed as kindergarten ready in school year 2021–22, while 58.4 percent of kindergarten students in Texas were assessed as kindergarten ready for the same school year. Across Texas in school year 2021–22, 51.2 percent of all economically disadvantaged students were assessed as kindergarten ready. WOCCISD kindergarteners are significantly less likely to be assessed as kindergarten ready than economically disadvantaged kindergarteners statewide.

The rate of WOCCISD students assessed as kindergarten ready increased by 39.0 percent in school year 2021–22 when those students attended North Early Learning Center. At the state level, the kindergarten readiness rate increased by 18.0 percent in the same school year when students attended prekindergarten. This growth is significant for the North Early Learning Center students; however, the district's kindergarten readiness rate for students who attended prekindergarten remains markedly lower than the state's. This disparity in readiness means that West Orange-Stark Elementary staff, who are required to provide instruction in the elementary TEKS, also must address students' readiness gaps.

Kindergarten readiness was found to be the strongest predictor of grade three State of Texas Assessments of Academic Readiness (STAAR) performance, according to an early childhood analysis by the E3 Alliance conducted in 2016. STAAR performance impacts all three domains of a campus' accountability ratings. In addition, in its 2020 publication *Kindergarten Readiness, Later Health, and Social Costs*, the American Academy of Pediatrics found that

kindergarten readiness also is predictive of dropout risk, substance use, and mental health outcomes. Kindergarten readiness is important for the campus and district, and for the community.

The director of curriculum should collaborate with the North Early Learning Center principal and the West Orange-Stark Elementary School principal to implement and integrate best practices in supporting early learners, especially as WOCCISD students transition from North Early Learning Center to West Orange-Stark Elementary. Three specific strategies are recommended.

First, West Orange-Stark Elementary School should continue to expand its implementation of positive behavior interventions, a best practice strategy identified by the National Association of School Psychologists (NASP). NASP is the world's largest organization of school psychologists and works to advance effective practices to improve students' learning, behavior, and mental health. Positive behavior interventions focus on increasing desirable behaviors instead of decreasing undesirable behaviors. Such interventions include considering how the students' environment contributes to behavior outcomes, modeling desired behaviors, reinforcing desired behaviors, and focusing on prevention strategies rather than punishment.

The elementary school has made substantial progress in its use of positive discipline. The campus uses a classroom management system known as CHAMPS (conversations, help, activity, movement, participation, success), which integrates research-based positive behavior strategies. In addition, the district conducted a campuswide training in

the Capturing Kids Hearts program, which focuses on cultivating relational capacity, improving school culture, and strengthening trust between students and teachers. At the time of the review team's onsite visit, the district was expanding Capturing Kids Hearts training to noninstructional staff.

The North Early Learning Center operates in accordance with the Head Start Program Performance Standards, including 45 Code of Federal Regulations, Section 1302.90(c)(1)(i), which requires that staff "implement positive strategies to support children's well-being and prevent and address challenging behavior." The expansion of positive behavior strategies at the elementary school is a best practice and aligns vertically with strategies used at the North Early Learning Center. By expanding this practice, the elementary school would facilitate the transition to its campus of students from North Early Learning Center who already are accustomed to the model of discipline.

Second, West Orange-Stark Elementary should expand its academic intervention model. The elementary school's current intervention team consists of one teacher and two paraprofessionals who provide data-driven, small-group instruction. The district should consider hiring a second team, which would enable the elementary to provide two intervention teams, one each for kindergarten to grade two and grades three to five. Although this expansion would entail a significant investment by the district, it would enable the campus to deliver substantial and targeted support to the tested grade levels, distinct from the support provided to early learners who are entering the district far behind their Texas peers. This support would help teachers maintain the rigorous depth and pace of the WOCCISD curriculum scope and sequence, while also meeting the specific needs of the district's student population.

Third, North Early Learning Center teachers and West Orange-Stark Elementary teachers should conduct a practice known as looping, wherein they teach a cohort of prekindergarten students at North Early Learning Center, and then transition with their respective cohorts to teach them kindergarten at West Orange-Stark Elementary. The subsequent year, the teacher would return to the early learning center to teach a new cohort of students and repeat the process.

This practice, which was proposed by North Early Learning Center leadership, would aid vertical alignment by enabling staff to teach consecutive grade levels. In addition, looping

FIGURE 2–17
RECOMMENDED INTERVENTION TEAM COSTS, 2022

STAFF	INVESTMENT	COST (1)
Intervention Teacher	Certified Instructor	$60,000
Interventionist	Paraprofessional	$19,747
Interventionist	Paraprofessional	$19,747
Total		**$99,494**

NOTE: (1) Cost assumes benefits costs of 20.0 percent of salary.
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

promotes the dissemination of best practices by exposing teachers to what works at both campuses. The presence of looping teachers for two school years would facilitate the introduction of promoted students to the new campus, staff, and expectations.

The fiscal impact of these recommendations assumes the district would add an intervention team consisting of a full-time intervention teacher and two paraprofessional positions (interventionists) on the elementary school campus, at an annual cost of $99,494. No fiscal impact is assumed for the expansion of positive behavior interventions because the district already has adopted classroom management and professional development systems. In addition, no fiscal impact is assumed for the implementation of teacher looping. **Figure 2–17** shows an example of an intervention team plan and corresponding budget implications.

GIFTED AND TALENTED PROGRAM

The district has implemented several components of its gifted and talented (GT) program in accordance with the Texas Education Agency's Texas State Plan for the Education of Gifted/Talented Students (State Plan). However, WOCCISD does not conduct annual evaluations of its GT services, share GT information with the WOCCISD Board of Trustees (board), or use the evaluation data to modify and update the district and campus improvement plans (DIP and CIP), as outlined in TEA's GT State Plan, Section 6.8.

At the time of the review, the district's GT Handbook states that the GT program will be evaluated each year, evaluation information will be shared with the board, and CIPs will show provisions for improving GT services. However, staff reported that the board members are not updated on the GT program operations or their effectiveness. By providing the board with GT data and updates, WOCCISD could improve community exposure and support for the GT program, while helping the board members to be better stewards of the

program. The district also did not establish any GT program goals in its CIPs or DIP. By integrating GT goals into the improvement plans, the district would introduce an additional level of accountability to the GT program, while leveraging existing district monitoring systems.

The director of student services should collaborate with the campus principals to evaluate the elementary school, middle school, and high school GT programs annually for alignment with TEA's GT State Plan. Each campus should address areas for improvement in its CIP. The superintendent and the director of student services should discuss comprehensive results and present them to the board annually. The district and each campus should address those results when developing the CIPs and DIP.

For guidance, Houston ISD conducted an extensive Gifted and Talented Program Evaluation: 2019–2020, which was submitted to the Houston ISD Board of Trustees in March 2021. It is available on the Education Resource Information Center website.

LESSON-PLANNING PROCESSES
District leadership should assess the lesson-planning process to ensure efficiency and flexibility.

WOCCISD has strong lesson-planning systems and monitoring methods. In addition, campuses schedule daily time for individual lesson planning time and weekly time for collaborative lesson planning time with grade-level or subject-area colleagues. In addition, the district provides coaching and professional development opportunities to support lesson planning throughout the year. Nonetheless, during interviews staff expressed feeling overwhelmed by the district's lesson-planning requirements.

The Texas Education Code, Section 11.164, instructs a board of trustees to limit "redundant requests for information and the number and length of written reports that a classroom teacher is required to prepare." Section 11.164(a)(6) specifies

an exception, which authorizes a district to require classroom teachers to prepare "a unit or weekly lesson plan that outlines, in a brief and general manner, the information to be presented during each period at the secondary level or in each subject or topic at the elementary level."

Instructional staff reported regularly working until 7:00 PM due to the extensive lesson-planning requirements. Experienced teachers expressed concern for staff who are new to the district or who received minimal lesson-planning exposure in their educator-preparation programs. Other staff echoed these concerns, reporting that the district provides time and support to plan, and teachers help each other when possible, but the length and complexity of the plans were demanding and time-consuming.

Considering the value of lesson planning and the importance of teachers' engagement in the process, the assistant superintendent of curriculum and instruction and director of curriculum should solicit feedback from teachers, with the goal of maximizing procedural efficiency and flexibility in the lesson-planning process while maintaining the district's rigorous standards.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be addressed promptly. 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's School Performance Review Team did not assume a fiscal impact for the findings in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

The Legislative Budget Board's School Performance Review Team has identified a fiscal impact for the following observation.

RECOMMENDATION	2023–24	2024–25	2025–26	2026–27	2027–28	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
2. EDUCATION SERVICE DELIVERY							
The district should prioritize behavioral and academic support for early learners at West Orange-Stark Elementary School.	($99,494)	($99,494)	($99,494)	($99,494)	($99,494)	**($497,470)**	$0
Total	**($99,494)**	**($99,494)**	**($99,494)**	**($99,494)**	**($99,494)**	**($497,470)**	**$0**

3. BUSINESS SERVICES MANAGEMENT

ACCOMPLISHMENT

♦ West Orange-Cove Consolidated Independent School District's (WOCCISD) budget development process is timely and effective, and it receives widespread approval among staff and other key stakeholders.

FINDINGS

♦ WOCCISD does not monitor its contracted services effectively.

♦ WOCCISD lacks a formal process to track district assets effectively.

RECOMMENDATIONS

♦ **Recommendation 4: Develop and implement a formal contract management process featuring written procedures and practices to identify all district contracts, centrally capture and monitor contract requirements, and evaluate vendor performance.**

♦ **Recommendation 5: Develop and implement a comprehensive fixed-asset management process to identify, record, inventory, and track fixed assets.**

BACKGROUND

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

Financial management includes budget preparation and administration, which are critical to overall district operations. Budget development and adoption require expenditure oversight and campus and community stakeholder involvement. Managing accounting and payroll includes developing internal controls and safeguards, reporting account balances, and scheduling disbursements to maximize funds. Management of this area includes segregation of duties, use of school administration software systems, and training staff.

Managing assets involves identifying investments with maximum interest-earning potential while safeguarding

funds and ensuring liquidity to meet fluctuating cash-flow demands. Forecasting and managing revenue include efficient tax collections to enable a district to meet its cash-flow needs, earn the highest possible interest, and estimate state and federal funding. Capital asset management involves identifying a district's property (e.g., buildings, vehicles, equipment) and protecting it from theft and obsolescence. Insurance programs cover staff health, workers' compensation, and district liability.

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

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

WOCCISD's chief financial officer (CFO) oversees the Finance Department, which is responsible for the district's accounting, payroll, purchasing, and risk management functions. The CFO also serves as the financial adviser to the superintendent and the WOCCISD Board of Trustees. The CFO supervises an executive administrative assistant, payroll clerk, purchasing clerk, accounts payable clerk, Public Education Information Management System (PEIMS) clerk, and receptionist. The accounts payable clerk processes vendor invoices; the purchasing clerk processes district purchase orders; the PEIMS clerk oversees the district's PEIMS transactions; and the payroll clerk processes payroll. The CFO performs bank reconciliations.

Figure 3–1 shows the organization of WOCCISD's Finance Department.

FIGURE 3–1
WEST ORANGE-COVE CONSOLIDATED ISD'S FINANCE DEPARTMENT ORGANIZATION
SCHOOL YEAR 2022–23
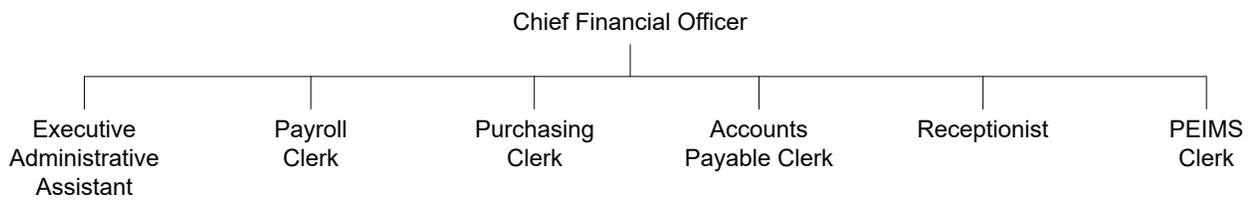
NOTE: PEIMS=Public Education Information Management System.
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

FIGURE 3–2
WEST ORANGE-COVE CONSOLIDATED ISD'S GENERAL FUND BALANCES
SCHOOL YEARS 2018–19 TO 2020–21

CATEGORY	2018–19	2019–20	2020–21
Beginning Fund Balance	$15,146,085	$12,727,620	$14,001,970
Ending Fund Balance	$12,727,620	$14,001,970	$12,958,976
Increase/(Decrease)	($2,418,465)	$1,274,350	($1,042,994)
Percentage change from previous year	(16.0%)	10.0%	(7.4%)

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2018–19 to 2020–21.

Figure 3–2 shows WOCCISD's fund balance from school years 2018–19 to 2020–21. A fund balance is the amount of district assets in excess of liabilities. These assets may include investments, delinquent taxes, accounts receivable, and inventories.

TEA requires that districts maintain a minimum unrestricted fund balance of approximately two-and-one-half months of operating expenditures to earn a rating of A on the School Financial Integrity Rating System (FIRST). WOCCISD's budget process has resulted in a healthy fund balance that is able to fund the district's operating expenditures for more than six months. Despite variations due to an increase in pandemic-related funding and expenditures, WOCCISD's fund balance exceeded TEA's FIRST guidelines from school years 2018–19 to 2020–21.

The Legislative Budget Board's School Performance Review Team visited the district in October 2022, at which time WOCCISD was preparing to make a recapture payment pursuant to the Texas Education Code, Section 48.257. Recapture is an element of the state's school finance system that is intended to equalize educational funding by redistributing revenue from property-wealthy districts to property-poor districts. WOCCISD also was subject to recapture during school year 2021–22.

Figure 3–3 shows WOCCISD's actual financial data for school years 2018–19 to 2020–21 and budgeted financial data for school years 2021–22 to 2022–23. The most significant expenditure categories for school year 2022–23 are: instruction, which constitutes 40.4 percent of total operating expenditures; debt service, which constitutes 14.8 percent; and school leadership, which constitutes 14.8 percent. Food service and general administration also were significant expenditure categories during these years.

WOCCISD's school year 2022–23 budgeted total for total expenditures is $32,686,258, which represents an increase of 29.6 percent from its 2018–19 total expenditures. The growth in revenue during the previous four school years results primarily from a significant increase in local property tax values. Local property tax revenue has increased by 33.0 percent since school year 2018–19, and most of that increase occurred from school years 2021–22 to 2022–23. Budgeted state and federal revenues also have increased since school year 2018–19, with increases of 9.8 percent and 502.7 percent, respectively. As WOCCISD's revenue has increased, the district also has increased its total expenditures, including $4,844,480 in debt service, which is its second largest budgeted expense for school year 2022–23 and represents the largest increase in a single category. This increase is the result of large capital projects, including the development of a new athletic facility. The district also has decreased various

FIGURE 3–3
WEST ORANGE-COVE CONSOLIDATED ISD ACTUAL AND BUDGETED FINANCIAL DATA
SCHOOL YEARS 2019–20 TO 2022–23

CATEGORY (1)	2019–20 ACTUAL	2020–21 ACTUAL	2021–22 BUDGETED	2022–23 BUDGETED
Revenue				
Local Property Tax from Maintenance and Operations (excluding recapture)	$19,771,199	$19,800,569	$20,262,501	$26,291,352
Other Local Revenue	$1,144,387	$217,134	$103,913	N/A
State Operating Funds	$4,555,759	$5,192,304	$3,799,695	$5,002,090
Federal Funds	$332,352	$2,087,865	$525,000	$2,003,208
Total Revenue (2)	**$25,803,697**	**$27,297,872**	**$24,691,109**	**$33,296,650**
Expenditures				
11, 95 Instruction	$12,005,326	$12,553,451	$13,459,829	$13,210,108
12 Instructional Resources and Media Services (3)	$243,005	$242,766	$252,090	$246,054
13 Curriculum and Staff Development	$295,983	$306,356	$350,652	$334,261
21 Instructional Leadership	$562,112	$615,905	$313,976	$323,891
23 School Leadership	$1,319,740	$1,342,015	$1,384,439	$1,410,857
31 Guidance and Counseling Services	$501,958	$509,923	$530,403	$544,344
32 Social Work Services	$17,182	$18,989	$17,549	$11,017
33 Health Services	$146,448	$188,370	$162,579	$11,017
34 Transportation	$1,077,652	$1,109,683	$1,425,671	$1,282,772
35 Food Services (4)	$0	$0	$0	$1,417,317
36 Extracurricular	$683,762	$678,608	$1,425,671	$932,162
41 General Administration	$1,388,907	$1,357,343	$1,425,671	$1,383,265
51 Facilities Maintenance and Operations (5)	$3,765,356	$4,050,766	$4,362,988	$4,836,709
52 Security and Monitoring	$232,141	$279,163	$354,275	$377,453
53 Data Processing Services	$398,183	$414,158	$469,898	$781,098
61 Community Services	$3,688	$5,552	$6,000	$0
72 Debt Service	$0	$0	$0	$4,844,480
81 Capital Outlay	$2,580,364	$6,782,223	$2,776,268	N/A
Total Expenditures	**$25,221,807**	**$31,652,511**	**$28,102,250**	**$32,686,258**

NOTES:
(1)   The Texas Education Agency uses category numbers to classify expenditures.
(2)   Total revenue excludes contributions from the Teacher Retirement System of Texas.
(3)   The Instructional Resources and Media Services function code previously was labeled Library and Media Services.
(4)   The Food Services function code represents the money spent from the district's general fund on activities whose purpose is managing a school's or district's food services program and serving regular and incidental meals, lunches, or snacks in connection with school activities. Food services operations maintain their own funds, and this amount remains $0 unless the district's food services fund operates at a loss for the school year and the district must cover food service losses from its general fund.
(5)   The Facilities Maintenance and Operations function code previously was labeled Plant Maintenance and Operations.
(6)   The budgeted school year 2022–23 local property tax from maintenance and operations, excluding recapture, includes all estimated local revenue.
SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System Financial Data, school years 2019–20 to 2021–22; West Orange-Cove Consolidated ISD, October 2022.

FIGURE 3–4
WEST ORANGE-COVE CONSOLIDATED ISD'S TAX RATE COMPARED TO PEER DISTRICTS (1)
SCHOOL YEARS 2018–19 TO 2022–23

DISTRICT	2018–19	2019–20	2020–21	2021–22	2022–23
West Orange-Cove Consolidated ISD	**$1.4250**	**$1.3234**	**$1.3097**	**$1.2906**	**$1.2713**
Bellville ISD	$1.2600	$1.1759	$1.1352	$1.1352	$1.1352
Coldspring-Oakhurst Consolidated ISD	$1.1550	$1.0721	$1.0136	$0.9475	$0.9220
Sweeny ISD	$1.2117	$1.1417	$1.0347	$1.0347	$1.0364

NOTE: (1) Tax rates are calculated per $100.00 in property valuation.
SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2018–19 to 2022–23.

FIGURE 3–5
WEST ORANGE-COVE CONSOLIDATED ISD'S SMART SCORE AND FIRST RATINGS COMPARED TO PEER DISTRICTS
CALENDAR YEAR 2020 AND SCHOOL YEAR 2021–22

DISTRICT	FIRST RATING (1)	SMART SCORE (2)	SMART SCORE ACADEMIC PERFORMANCE RATING	SMART SCORE SPENDING RATING
West Orange-Cove Consolidated ISD	**A=Superior**	**2.0**	**Very Low Academic Progress**	**Average spending**
Bellville ISD	A=Superior	3.0	Average Academic Progress	Average spending
Coldspring-Oakhurst Consolidated ISD	B= Passed	2.0	Very Low Academic Progress	Average spending
Sweeny ISD	A=Superior	2.5	Average Academic Progress	High spending

NOTES:
(1)   School year 2021–22 data were the most recent data available for the Financial Integrity Rating System of Texas (FIRST) ratings as of October 2022.
(2)   Smart scores for calendar year 2020 are based on a three-year average and use data from school years 2016–17, 2017–18, and 2018–19. School year 2020 data were the most recent data available for the Smart Score ratings as of October 2022.
SOURCES: Texas Education Agency, Financial Integrity Rating System of Texas, school year 2021–22; Texas Smart Schools Initiative, 2020 Smart Scores.

expenditures in areas such as community services, health services, and transportation.

The review team selected three school districts as peer districts for WOCCISD: Bellville ISD, Coldspring-Oakhurst Consolidated ISD, and Sweeny ISD. Peer districts are districts similar in size and other characteristics to WOCCISD that are used for comparison purposes. **Figure 3–4** shows WOCCISD's tax rate compared to peer districts from school years 2018–19 to 2022–23. The tax rate, set by the local district pursuant to Texas statute, contributes to local revenue. WOCCISD reported a higher tax rate than each of its three peer districts during the reporting period.

The Texas Smart Schools Initiative is a research project administered by Texas A&M University that issues Smart scores to districts as a measure of their success in combining cost-effective spending with the achievement of measurable student academic progress. On the Smart score scale ranging from 1.0 to 5.0, the initiative issued WOCCISD a score of 2.0 for calendar year 2020, the most recent year that the initiative issued scores. For that year, WOCCISD received a performance rating of very low academic progress and a

spending rating of average. Among WOCCISD's fiscal peer districts, Coldspring-Oakhurst CISD also received a Smart score of 2.0, while the Bellville and Sweeny districts received Smart scores of 3.0 and 2.5, respectively. Bellville ISD received ratings of average academic progress and average spending. Sweeny ISD received ratings of average academic progress and high spending. WOCCISD scored in the lowest category of academic performance and the median category of spending that the initiative assigned.

TEA's FIRST system assigns each school district a grade ranging from A to F to hold it accountable for the quality of its financial management practices and for improving these practices. WOCCISD earned the highest FIRST rating of A for school year 2021–22, as did the peer districts Bellville ISD and Sweeny ISD; Coldspring-Oakhurst CISD earned a FIRST rating of B.

Figure 3–5 shows WOCCISD's FIRST and Smart score ratings compared to peer districts.

The district uses the school management software Skyward for its financial operations. Skyward enables administrators to monitor campus and department funds; view the master

vendor list; request, approve, and complete purchases; manage district invoices; manage and execute payroll; and generate various financial reports. The district also utilizes RevTrack, an online cash management system that interfaces with Skyward and enables administrators and staff to collect digital payments from students and for other district services.

The purchasing clerk within the Finance Department manages the district's purchasing and contracting functions under the supervision of the CFO. WOCCISD's Board Policy CH (LOCAL) authorizes the superintendent to make budgeted purchases for goods and services. The district's Business Office Procedures Manual states that the campus administrator or department head first must approve purchases for their functional areas. The CFO then approves all purchases. Staff must complete the purchasing process, regardless of the purchase amount, except for items greater than $50,000, which require a minimum of three quotes and board approval. The purchasing clerk maintains a vendor master list on Skyward that staff can consult when submitting purchase order requests.

The purchasing clerk manages vendor relations, and all vendors must submit a conflict-of-interest form on the Finance Department's website before conducting business with the district.

The district stores surplus assets in locations throughout campuses and departments. For most purchases, the district uses a just-in-time delivery process, and items also are delivered to the purchasing campuses or departments.

WOCCISD's external auditor found no instances of noncompliance or other material weaknesses in the district's financial management during the last three years' financial audits.

DETAILED ACCOMPLISHMENT

BUDGET DEVELOPMENT PROCESS

WOCCISD's budget development process is timely and effective, and it receives widespread approval among staff and other key stakeholders. Written guidelines dictate the timeline for each step of the budgeting process. Each December, campuses solicit schedule requests from students and use the information to determine staffing needs. By March, department heads and principals must evaluate their current budgets and generate staffing and servicing requests for the following school year. The CFO, superintendent, department heads, and principals then

hold two meetings—one to discuss staffing, and one to discuss educational service requests. After leadership makes these decisions, the CFO finalizes any approved changes and aggregates that data into the district's budget for the subsequent school year. The budget is completed by June 1, after which the CFO and superintendent present the budget to the board and host a budget workshop to discuss any details or questions from board members regarding the budget proposal. The board votes on adopting the budget during the first week of July, before the start of the school year.

WOCCISD's budget process has resulted in a healthy fund balance sufficient to fund the district's operating expenditures for more than six months. In addition, staff reported that, by following the written budget guidelines, the budget is completed in a consistent and timely manner, and district administration effectively incorporates individual departmental and campus needs into the decision-making process.

DETAILED FINDINGS

CONTRACT OVERSIGHT (REC. 4)

WOCCISD does not monitor its contracted services effectively.

WOCCISD's purchasing clerk is responsible for the district's bid procurement process and the oversight and evaluation of vendor contracts. However, the district has no formal process to monitor contract requirements or vendors' performance. Additionally, the district does not follow any formal criteria or guidelines when deciding on approving or renewing district contracts. The district also has no formal performance monitoring procedures for staff who receive services from vendors to follow.

During onsite interviews, the CFO reported reviewing all contracts and having the final authority to determine renewal or nonrenewal. The CFO said that the district does not conduct formal cost-benefit analyses of its contracted services when deciding to renew a contract, and that the district typically renews contracts if it did not perceive issues with the vendor. The CFO and purchasing clerk reported that the district occasionally may terminate a vendor's contract due to poor performance when issues are reported informally by staff. Informal feedback typically occurs through conversations between campus or department staff and the purchasing clerk. However, the district has no formal process for staff to provide routine vendor feedback.

FIGURE 3–6
PRIMARY RESPONSIBILITIES OF A CONTRACT MANAGER
SCHOOL YEAR 2022–23

RESPONSIBILITY	FULFILLED BY WOCCISD
Participating with the procurement team in solicitation development and the review of contract documents	Yes
Serving as the primary point of contact for agency (district) communication with the contractor regarding all matters pertaining to the contract	Yes
Managing any state property used in contract performance (e.g., computers, telephones, identification badges)	Yes
Implementing a quality-control and contract-monitoring process	No
Monitoring the contractor's progress and performance to ensure that products and services procured conform to the contract requirements and keeping timely records of findings	No
Consulting with agency legal counsel in a timely manner to address any legal concerns or issues	Yes
Managing, approving, and documenting any changes to the contract through the amendment process authorized by the terms of the contract	No
Inspecting and approving the products or services by submitting a written document accepting the deliverables or obtaining documentation from the end users responsible for receipt that inspection and approval have been completed	No
Verifying accuracy of invoices and authorizing payments consistent with the contract terms	No
Monitoring the contract budget to ensure that sufficient funds are available throughout the term of the contract	Yes
Identifying and resolving disputes with the contractor in a timely manner	No
Exercising state (or district) remedies, as appropriate, when a contractor's performance is deficient	No
Maintaining appropriate records in accordance with the records retention schedule	Yes
Confirming that all products or services have been delivered and that delivery is completed before the expiration date of the contract	No
Performing contract closeout processes by ensuring that the district's contract records contain all necessary contract documentation, and documenting experiences gained.	No

SOURCE: Texas Comptroller of Public Accounts, Statewide Procurement Division, May 2022.

Without proper contract oversight, WOCCISD exposes itself to potential fraud and abuse by vendors. These abuses could include substandard service, overspending on services, noncompetitive pricing, overcharging for items, and delivering less than the best value for the district's investment. Furthermore, if WOCCISD does not document and monitor contract performance and evaluation appropriately, the district may not be able to avail itself of legal remedies in case of breach of contract, unsatisfactory performance by a vendor, or any other loss to the district resulting from a service contract or provider.

Figure 3–6 shows the Comptroller of Public Accounts' (CPA) list of primary responsibilities of a contract manager, and whether WOCCISD is conducting these duties consistently. This list is a guide for all contract managers, not a comprehensive list.

In accordance with the State of Texas Procurement Contract Management Guide, 2022, a key function of contract administration is monitoring the contract vendor, which includes confirming that the vendor fulfills the legal obligations of the contract and demonstrates adequate performance in all duties set forth in the contract. The Texas A&M University System Contract Management Handbook, 2020, states, "Contract monitoring may be viewed as a preventative function, an opportunity to determine the contractor's need for technical assistance, or a valuable source of information concerning the effectiveness and quality of services being performed." The handbook emphasizes that contract administrators consider the following factors when determining what to monitor:

- how the organization will ensure it received the service for which it is paying;

- how the organization will ensure that the contractor is complying with the terms of the contract; and

- how the organization will determine that the contract is complete and establish closure.

TEA's Financial Accountability System Resource Guide (FASRG) provides the rules of financial accounting for school districts, charter schools, and education service centers in Texas. FASRG states that implementing a system to evaluate vendors and their performance is important to support an effective purchasing function. The guide also encourages school districts to develop an open and professional relationship with vendors, but that it is important to document any issues that occur using these best practices:

- note the date with an accurate description of the issue;

- contact the vendor with specific guidance on the issue that must be corrected;

- provide written notification to the vendor if the issue persists, restate the issue and desired resolution, and include a breach-of-contract notification with the associated cancellation of the contract; and

- contact legal counsel if the issue is not resolved using these steps.

WOCCISD should develop and implement a formal contract management process featuring written procedures and practices to identify all district contracts, centrally capture and monitor contract requirements, and evaluate vendor performance.

The CFO should collaborate with the purchasing clerk to develop a document identifying all district contracts, including specific details about services provided. The document should include the following items:

- terms of the contract;

- period of the contract (e.g., months or years);

- renewal provisions;

- dispute resolution terms;

- termination clause;

- payment terms;

- severability and confidentiality clauses;

- certificates of insurance and any related bonds;

- vendor criminal history; and

- how the district obtained the services.

The CFO also should develop a formal vendor review schedule and vendor performance report for staff to use

when evaluating vendor and contracted service performance. The formal review schedule should be accessible to staff on the district website and identify staff responsible for monitoring contracted services or contract provisions. The review schedule also should specify the intervals at which staff are required to provide formal feedback on vendor performance, which may vary according to contract length and requirements. Similarly, the vendor performance report should be accessible to staff on the district website and should provide objective criteria for staff to use when evaluating vendor performance. **Figure 3–7** shows a best practice performance report that Grapevine-Colleyville Independent School District uses throughout its vendor evaluation process.

The purchasing clerk should collect and manage completed vendor performance reports within the Finance Department. The CFO should consider the feedback provided in vendor performance reports when evaluating contract renewals and negotiations, and when soliciting new contract bids for district services.

Additionally, the CFO should provide training at least annually that will enable district staff that have contract oversight functions to implement the formal vendor review schedule effectively and provide objective and timely feedback in the vendor performance report.

WOCCISD should encourage the CFO to attend training for the oversight and management of contracts and evaluation of contract vendors.

This recommendation could be implemented with existing resources.

ASSET MANAGEMENT (REC. 5)

WOCCISD lacks a formal process to track district assets effectively.

WOCCISD maintains two types of fixed assets—capital assets and controlled assets. Capital assets are large purchases that are capitalized and depreciated. Board Policy CFB (LOCAL) defines capital assets as assets costing $5,000 or more. These assets often include buildings and improvements, equipment, and vehicles. Controlled assets are those valued at less than $5,000. TEA's FASRG defines controlled assets as "personal property that is durable but does not meet the district's criteria for capitalization as a capital asset. These items have a useful life longer than one year." Examples of controlled assets include computers, audiovisual equipment, textbooks, desks, and physical education equipment. Board

FIGURE 3–7
GRAPEVINE-COLLEYVILLE ISD VENDOR PERFORMANCE REPORT
SCHOOL YEAR 2022–23

Purchasing Department
(817) 251-5563 - Phone
(817) 251-6507 - Fax

Grapevine ★ Colleyville
Independent School District

3051 Ira E. Woods Ave.
Grapevine, Texas 76051

VENDOR PERFORMANCE REPORT

INSTRUCTIONS:
1. Complete this form to report complaints or compliments against vendors, commodities, or to report any unsatisfactory service.
2. Be sure to furnish all necessary detail so that a satisfactory settlement of the complaint can be made.
3. Verify all information to insure accuracy. Vendor performance reports become a permanent record of the commodity or vendor concerned and must be accurate to guarantee intelligent and equitable settlement and to serve as a guide for future action.

Name of Campus or Department				Date *(month, day, year)*
Requisition number	Purchase Order Number	Name of Buyer	Item number	Contract or bid number
Name of vendor			Name of vendor contact	
Address of vendor (*number and street, city, state, and ZIP code*)				
Telephone number ( )			E-mail address of vendor	

POSITIVE COMMENTS (Check all that apply)	PROBLEMS WITH DELIVERY AND QUALITY (Check all that apply)	
☐ Vendor confirms delivery time and date prior to delivery.	☐ Delivery not made on date ordered or promised.	☐ Unsatisfactory workmanship in installation of commodity.
☐ Vendor responds to complaints in a timely manner.	☐ Delivery in damaged condition.	☐ Quantity delivered in excess of order and cannot be accepted.
☐ Vendor is responsive to our needs.	☐ Quality of commodity is inferior to quality requested. *(explain in Remarks section)*	☐ Quantity delivered less than ordered. Balance is required.
☐ Vendor is reliable and dependable.		☐ Other *(explain in Remarks section)*
☐ Other *(explain in Remarks section)*	☐ Unsatisfactory and unauthorized substitute delivered by vendor.	

REMARKS *(give detailed explanation of complaint I compliment in this space, attach or send additional sheet if additional space is necessary)*

Performance Report executed by:

Name *(please print)*	Title
Telephone number ( )	E-mail address
Signature	Date *(month, day, year)*

FORM NO.: 3017-15	VENDOR PERFORMANCE REPORT	*Last Revised: July 2015*

SOURCE: Grapevine-Colleyville ISD, 2023.

Policy CFB (LEGAL) requires the district to maintain inventories of its assets as recommended and directed by FASRG for reporting and insurance purposes.

The district uses a just-in-time delivery process and stores items at the purchasing campus or department. Department heads, department secretaries, and campus secretaries are responsible for signing for and receiving items, which then are distributed to other staff.

The district does not have a formal process to determine how campus and department staff should manage district assets. For example, each campus determines the district's textbook management procedures. As a result, campus principals typically delegate textbook management to other staff on their administrative teams. One campus administrator reported using Microsoft Excel spreadsheets to track textbook inventory, while another reported using hard copies that require staff to log each withdrawal or return manually.

Similarly, individual campuses and departments are responsible for developing methods to track other fixed and controlled assets. District staff employ a range of processes, and various individuals across departments and campuses managing this responsibility. At North Early Elementary School, the financial specialist inventories and tracks most new items individually through a combination of paper-based and electronic document-based inventories. At the high school, the campus secretary initially inventories new items that the campus receives. After high school staff sign for and collect those items, the department head who supervises that staff becomes responsible for tracking the assets. For example, an English teacher who received approval for a purchase order for a new class set of novels would receive those books when they arrived on campus. After the teacher collected them, maintenance and inventory of the novels would become the responsibility of the head of the English Department. The middle school principal reported that an assistant principal on campus is responsible for managing district assets but could not identify the specific process or methods used for this purpose.

WOCCISD's CFO is responsible for overseeing all the district's asset management operations, which are bifurcated between technological and nontechnological assets. The Technology Department monitors technological assets and maintains an internal inventory using the online platform Euphoria, a proprietary spreadsheet, and a Google console that tracks Chromebook laptop computers. The Technology

Department is required to approve all the district's technological purchases, and the department physically tags each asset with a radio frequency identification bar code before distributing assets to other departments and campuses. The director of technology reported that the department conducts a comprehensive inventory at the end of each school year in May or June and that the most frequently damaged or missing items are Chromebooks that have been assigned to students.

In addition to technological assets, the district has contracted with a national records retention and asset management service to conduct comprehensive inventory reports every two years. This service includes bar tagging and scanning of all district assets, aside from Chromebooks and other laptops, which then are combined with the Technology Department's internal inventory into one unified report. The CFO can view the district's inventory status on a digital platform at any time between the biennial reports. The CFO reported that it likely would be more cost-effective to join a cooperative group for fixed-asset management services; however, the district had not performed any formal cost-benefit analysis or explored the opportunity in greater detail.

During onsite interviews, staff were unable to identify when the records retention and asset management service contractor last visited the district and reported that operational schedules became irregular in response to the COVID-19 pandemic. Staff also reported that, although they believe the biennial inventory process is beneficial, the subsequent maintenance of accurate accounts of nontechnology assets during the interim periods remains a challenge for department and campus administrators.

The lack of an effective and coordinated fixed-asset management process limits the district's ability to capture asset information at the procurement stage and track the cost, useful life, location, movement, custody, and disposition of each asset. In addition, the amount reported on financial statements may not be consistent with the value of actual fixed assets present in the district.

FASRG, Section 1.2.4.2, Inventories of Assets, states that certain capital assets, such as furniture and equipment, should be inventoried periodically. Best practices recommend conducting annual inventories at the end of the school term before staff leave. Discrepancies between the capital asset/inventory list and what is present should be settled. Missing items should be listed and written off in accordance with established policy.

FIGURE 3–8
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS BEST PRACTICES FOR FIXED-ASSET INVENTORY

Preliminary Steps

Identify individuals in the district who will have key fixed-asset responsibilities and establish the nature of such responsibilities.

Devise policies and procedures governing capitalization thresholds, inventory, accounting, staff accountability, transfers, disposals, surplus and obsolescence, and asset sale and disposition.

Determine district fixed-asset information needs and constraints.

Determine the hardware and software necessary to manage the system effectively.

Establishing the Fixed-asset Management System

Adopt a proposal establishing the fixed-asset system, including adoption of formal policies and procedures.

Develop positions and job descriptions for those with fixed-asset responsibilities.

Determine the structure of the fixed-asset inventory database and develop standardized forms to match the format of electronic records.

Provide training as necessary.

Identify specific fixed assets at less than the capitalization threshold that should be tracked for information purposes and safeguarding.

Budget the amount necessary to operate the fixed-assets management system adequately.

Implementing the Fixed-asset Management System

Inform all departments of the requirements, policies, and procedures of the fixed-assets system.

Identify and tag assets to be tracked on the system.

Enter information into the fixed-assets database.

Assign appropriate values to the assets in the database.

Establish location codes and custodial responsibility for fixed assets.

Maintaining the Fixed-asset Management System

Enter all inventory information into the automated fixed-asset system as assets are received.

Assign tag numbers, location codes, and responsibility to assets as the district receives them.

Monitor the movement of all fixed assets using appropriate forms approved by designated district staff.

Conduct periodic inventories and determine the condition of all assets.

Generate appropriate reports noting any change in status of assets, including changes in condition, location, and deletions.

Reconcile the physical inventory to the accounting records, account for discrepancies, and adjust inventory records.

Use information from the system to support insurance coverage, budget requests, and asset replacements.

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

CPA established fixed-asset best practices to assist local governments with implementing an effective and efficient fixed-assets management system. These best practices represent a comprehensive solution for fixed-assets management systems and include suggested steps to develop and maintain an effective system. **Figure 3–8** shows these best practices.

WOCCISD should develop and implement a comprehensive fixed-asset management process to identify, record, inventory, and track fixed assets.

The CFO should establish a detailed definition of controllable assets and develop written inventory and

tracking procedures. The CFO should include the following elements in the procedures to guide and train district staff in the proper handling of district assets:

- definitions and examples of controllable assets the district intends to track;

- methods to identify controllable and fixed assets;

- staff responsibilities and accountability for assets;

- inventory database(s) used for record keeping, including procedures for copying paper and electronic files as backups;

- frequency of physical inventories, such as annual or semiannual, including procedures for transferring assets between locations;

- procedures to follow when assets cannot be located, including responsibilities for submitting reports to the police department and the district's insurance carrier, as appropriate; and

- procedures to follow for deleting inventory from records when the district disposes of assets that are no longer useful or needed.

The district also should conduct a cost-benefit analysis to determine whether it should purchase a system, join a cooperative group, or develop and implement its own comprehensive fixed-asset system.

This recommendation could be implemented with existing resources.

ADDITIONAL OBSERVATIONS

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

INVOICE MANAGEMENT

WOCCISD's invoicing process places the district at risk of missing payments.

When merchandise is delivered to the district, it typically arrives directly at the campus or department that submitted the purchase order. The campus secretary, department secretary, or department head then will review the packing slip and confirm that all requested items are present in the shipment before signing off on the receipt. These staff then submit the packaging slip and signed receipt to the district's accounts payable clerk to fulfill the shipment's invoice(s). If items do not arrive or arrive in unsatisfactory condition, the invoice remains unfulfilled, and the requester, accounts payable clerk, and purchasing clerk must collaborate to resolve the issue. All outstanding purchase orders can be viewed on Skyward, and most invoices are sent directly to the accounts payable clerk by the vendor or company.

During onsite interviews, staff reported that invoices occasionally are sent directly to the campus secretary or department staff who received the delivered items. In this instance, the Finance Department is unaware that the invoice has been received, which presents the risk that the invoice will remain unfulfilled or be paid late for the associated purchase orders. The CFO should update the Business Office Procedures Manual to include a process for secretaries or department staff to manage direct invoices, including requirements to forward invoices to the accounts payable clerk. The purchasing clerk and accounts payable clerk should implement additional training for district secretaries regarding the new procedures in the Business Office Procedures Manual.

CROSS-TRAINING

WOCCISD's Finance Department does not have a formal process for cross-training staff. Staff reported that cross-training is performed as needed and provided conflicting answers when describing which staff members were cross-trained in which functional areas. Effective cross-training helps to prevent lags or gaps in departmental performance during periods of turnover or extended staff absences. The CFO should develop a formal process to provide for cross-training department staff on each function of the Finance Department's operations.

INVESTMENT MANAGEMENT

WOCCISD does not utilize external services to evaluate its investment positions regularly. Currently, the CFO serves as the district's investment officer and is responsible for managing the district's long-term financial investments. The CFO regularly reports to the board regarding investment performance and attends annual investment training through regional Educational Service Center V. In this manner, the district has maintained a healthy fund balance that exceeds the FIRST indicator requirement of 2.5 months of operational expenditures. However, although the Business Office Procedures Manual provides guidelines for the district's general investment strategy, the CFO has significant latitude to invest in various financial instruments. To help the district pursue the most effective investment strategies, WOCCISD should consider utilizing an external advisory service to assess whether its long-term portfolio allocation is optimized to maximize returns and fund future district needs.

LONG-TERM FORECASTING

WOCCISD does not utilize professional long-term forecasting tools to evaluate changes in district demographics. During the review team's onsite visit, staff reported performing enrollment projections spanning seven to eight years by examining graduation rates relative to elementary enrollment rates. In addition, staff reported that the district's

enrollment rate historically has remained constant. Due to the recent growth of certain industries within the region, district demographics may change significantly. WOCCISD should consider hiring a professional demography service to conduct formal demographic projections. These projections would provide a more accurate and comprehensive report of future enrollment, which would enable the district to plan for any increases or decreases in special populations that may affect district needs, resources, or funding.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address the findings.

4. CHILD NUTRITION MANAGEMENT

FINDINGS

♦ West Orange-Cove Consolidated Independent School District (WOCCISD) lacks processes to direct the efficient use and crediting of U.S. Department of Agriculture (USDA) Foods.

♦ WOCCISD does not require that the food service management company adheres to meal planning guidelines, meal pattern requirements, or cycle menus.

♦ WOCCISD does not monitor the Child Nutrition Department's costs.

RECOMMENDATIONS

♦ **Recommendation 6: Require the food service management company to follow a process that maximizes the use of entitlement funding and the receipt of full credit for use of USDA Foods in the district's food service program.**

♦ **Recommendation 7: Establish processes for district oversight of the development of menus and quality of food in the district's cafeterias.**

♦ **Recommendation 8: Develop and implement a food service staffing formula based on industry standards and conduct physical inventories of the Child Nutrition Department's nonexpendable supplies and capital equipment.**

BACKGROUND

An independent school district's food service operation provides meals to its students and staff. The district may provide meals through USDA Child Nutrition Programs (CNP), which include the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Summer Food Service Program, and the USDA Foods in Schools Program. These programs provide financial assistance to school districts through cash reimbursements and allocations of food commodities for each meal they serve. In return, the districts must serve meals that meet federal nutritional requirements and districts must offer free or reduced-price lunches to eligible students. School districts also can be reimbursed for snacks served to children through age 18 in

afterschool programs. A district's food service operation also may offer catering services to supplement the food service budget or provide training for students interested in pursuing careers in the food service industry.

West Orange-Cove Consolidated Independent School District (WOCCISD) participates in the SBP and the NSLP, the NSLP After School Care Program, the Child and Adult Care Food Program, and the USDA Department of Defense Fresh Fruit and Vegetable Program (FFVP). The district also receives donated foods through the USDA Foods in Schools Program.

During school year 2022–23, WOCCISD offered free breakfast and lunch to all district students through the federal Community Eligibility Provision (CEP). CEP is a non-pricing meal service option that enables campuses and districts in high-poverty areas to serve breakfast and lunch at no cost to all enrolled students without collecting household applications. The USDA reimburses school districts that implement CEP according to the percentage of students the district identifies as categorically eligible for free meals based on their participation in qualifying federal programs, such as the Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, and Head Start. Migrant, homeless, and foster care students also are categorically eligible for free meals. Districts use a process called direct certification to identify the eligible percentage of enrolled students.

The two primary models of organizing school food service operations are self-management and contracted management. Using the self-management model, a district operates its child nutrition department without assistance from an outside entity. Using the contracted management model, a district contracts with a food service management company to manage all, or a portion of, its operations. In this arrangement, the management company may staff all or some food service operations.

Beginning in school year 2011–12, WOCCISD contracted with a food service management company (FSMC), Aramark Educational Services, LLC, to operate the district's child nutrition services. WOCCISD's Child Nutrition Department has 29 staff, including a child nutrition director, four cafeteria managers, and 24

cafeteria staff. The Child Nutrition Department also has access to the district's substitute pool for bus drivers and cafeteria staff to cover staff absences. The child nutrition director is an FSMC employee, and all other department staff are district employees. The child nutrition director reports to the chief financial officer (CFO) and is responsible for menu planning and supervising the cafeteria managers. The child nutrition administrative assistant is responsible for submitting monthly claims for federal reimbursement, conducting direct certification to identify students categorically eligible for meals, submitting hiring decisions to the Human Resources Department, and submitting state reports. Cafeteria managers oversee daily meal production, maintain production records, manage kitchen inventory, recommend hiring staff, and train new staff. Cafeteria staff prepare and serve meals, and receive, organize, and store groceries. **Figure 4–1** shows the district's reporting structure for its Child Nutrition Department.

During school year 2021–22, WOCCISD had 2,555 students enrolled in prekindergarten to grade 12. Four cafeterias serve the district's five campuses. North Early Learning Center, West Orange-Stark Elementary School, and West Orange-Stark Middle School each has a cafeteria. West Orange-Stark High School and West Orange-Stark Early College High School share the same campus and cafeteria. The middle school cafeteria also prepares meals for students at West Orange-Stark Academic Alternative Center, where campus staff deliver meals daily.

The Child Nutrition Department's budget was $1,417,317 for school year 2022–23. District staff reported that the Child Nutrition Department typically breaks even or makes a profit at the end of the year. The district recorded a child nutrition fund balance of $926,421 at the end of school year 2021–22.

The FSMC uses PRIMA Web, a school nutrition management software, for menu planning, nutrient analysis, recipes, and inventory management. The district uses Skyward, a school management software, to count and claim reimbursable meals and perform automated edit checks to verify the accuracy of meal counts.

DETAILED FINDINGS

USDA FOODS (REC. 6)

WOCCISD lacks processes to direct the efficient use and crediting of USDA Foods.

FIGURE 4–1
WEST ORANGE-COVE CONSOLIDATED ISD'S CHILD NUTRITION DEPARTMENT ORGANIZATION SCHOOL YEAR 2022–23
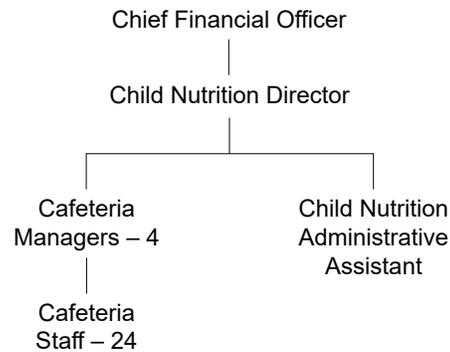
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

School districts that participate in NSLP are eligible to receive donated food from USDA to support school food service programs. The USDA Foods in Schools Program purchases domestic agriculture products and coordinates their distribution to states for use in child nutrition programs. USDA Foods consist of raw and processed foods, including frozen, fresh, canned, and dried products. Many of the foods are provided in bulk quantities, which often costs less than similar products a school could purchase on its own. Some districts contract with commercial food processors to convert bulk USDA Foods into menu items that are ready to heat and serve upon delivery to the districts.

The district's USDA Foods entitlement represents the amount it may spend on USDA Foods during the school year. The entitlement funding amount is based on the number of reimbursable lunches served during the previous school year multiplied by the federal rate of assistance per meal. The Texas Department of Agriculture (TDA) administers the state's USDA Foods in School Program. Each spring, TDA surveys participating districts to determine what products to order and provides each with its entitlement amount for the following school year. USDA Foods are available to child nutrition programs in three ways: direct delivery, USDA Foods processing, and the FFVP, which enables districts to use their USDA Foods entitlement funding to purchase fresh produce. Districts decide how to allocate their entitlement funds among these sources.

WOCCISD staff reported that the child nutrition director, an FSMC employee, selects the USDA products to purchase,

FIGURE 4–2
WEST ORANGE-COVE CONSOLIDATED ISD'S AND PEER DISTRICT'S USDA FOODS ENTITLEMENT USAGE
SCHOOL YEAR 2021–22

DISTRICT	TOTAL BEGINNING ENTITLEMENT	ENTITLEMENT USED	ENTITLEMENT REMAINING	REMAINING PERCENTAGE OF TOTAL
West Orange-Cove Consolidated ISD	**$153,259**	**$84,976**	**$68,283**	**44.6%**
Bellville ISD	$108,836	$111,019	($2,183)	(2.0%)
Coldspring-Oakhurst Consolidated ISD	$105,531	$103,250	$2,281	2.2%
Sweeny ISD	$101,408	$101,400	$8	0.0%

SOURCES: Legislative Budget Board School Performance Review Team; Texas Department of Agriculture U.S. Department of Agriculture (USDA) Food Reports for West Orange-Cove Consolidated ISD, Bellville ISD, Coldspring-Oakhurst Consolidated ISD, and Sweeny ISD, school year 2021–22.

and the child nutrition administrative assistant places the orders in the system. The child nutrition director also determines how to allocate the district's entitlement between processed and unprocessed foods. No district staff plays a role in selecting or allocating USDA Foods. A previous FSMC child nutrition director determined that the district would not allocate any of its entitlement funding to purchase foods from the FFVP. District staff were not involved in this decision and, subsequently, could not provide information to explain the reasoning for this decision. Staff reported that the cafeterias typically use all the USDA products that are delivered and have not lost food to spoilage or waste. However, the district has not established a process to confirm that it uses all its entitlement to minimize costs.

Figure 4–2 shows a comparison of the remaining value of WOCCISD's USDA Foods entitlement compared to peer districts at the end of school year 2021–22. Peer districts are districts similar in size and other characteristics to WOCCISD that are used for comparison purposes. During that school year, WOCCISD did not use $68,283 or 44.6 percent of its entitlement. This unused amount is significantly greater than the unused entitlements of the peer districts.

During interviews, neither district officials nor the child nutrition director could explain why the district did not use all its entitlement funds. Failure to take advantage of the full value of available USDA Foods is a missed opportunity for the district to lower food costs. In addition, failure to monitor USDA Food usage violates the FSMC contract and federal regulations. Pursuant to the U.S. Code of Federal Regulations, Title 7, Section 210.9(b)(15), certain district responsibilities may not be delegated to the FSMC, including the requirement for the district to confirm that the FSMC uses and receives the maximum amount of USDA Foods in the district's food service program.

In addition to insufficient oversight of the use of USDA Foods, the district does not have a process to confirm that it receives credit for all the USDA Foods the FSMC uses. The U.S. Code of Federal Regulations, Title 7, Section 250.51(a), requires FSMCs to credit school districts for the value of all USDA Foods used in meal service, including foods contained in processed end products. According to interviews with FSMC staff, the value of the USDA Foods used appears as a credit on the FSMC's monthly invoice. However, staff reported that the district lacks a reconciliation process to confirm that the monthly credits are accurate and account for the full value of USDA Foods used during a school year. Without a process to verify the FSMC's usage and crediting of USDA Foods, the district risks losing entitlement funds intended to support the food service program.

The USDA Foods entitlement is a financial asset that supplements a district's food costs. Using entitlement funding saves money that districts otherwise would spend in the commercial market. USDA Foods have associated delivery, processing, and storage costs, and it is important for districts to analyze the costs and benefits of allocation options. For example, schools that serve convenience products, known as heat-and-serve products, might allocate more entitlement funds to processed foods. Diverting USDA Foods to a processor would incur fees but might lower labor costs for food preparation. Districts should consider the processing and delivery costs of processed USDA Foods when comparing the price of these products to the commercial bid price of similar items. Alternatively, school food service programs that prefer to cook from scratch may benefit more from allocating entitlement funds to unprocessed or bulk USDA Foods. When considering nonprocessed items, districts should compare the USDA cost to the district's commercial bid cost, plus any applicable

storage fees, to determine whether the nonprocessed product offers the best value for the district.

WOCCISD should require the FSMC to follow a process that maximizes the use of entitlement funding and the receipt of full credit for USDA Foods in the district's food service program.

To implement this recommendation, the CFO should develop and implement a process to oversee the allocation of USDA entitlement funds and the selection of USDA Foods. This oversight process should include confirming that the FSMC is maximizing the use of the district's entitlement and that the allocation of entitlement funds meets the district's needs. The CFO also should implement an approval process for the FSMC's selection of USDA Foods.

Properly maximizing USDA Foods entitlement funding includes allocating funds among bulk items, processed items, and FFVP items. WOCCISD could use any of the following strategies to maximize use of USDA Foods:

- allocating entitlement funding among processed, nonprocessed, and FFVP products in accordance with the district's menu needs and meal preparation capabilities;

- requesting USDA Foods with multiple uses;

- comparing the prices and values of unprocessed and processed USDA Foods to commercial products; and

- using USDA Foods for summer food service programs.

Finally, the CFO should develop and implement a process to reconcile USDA Food credits in monthly invoices with the value of total USDA Foods received each school year, including the value of USDA Foods contained in processed end-products.

The fiscal impact of this recommendation assumes the district would save approximately $68,000 annually by implementing strategies to maximize the use of USDA Foods. The $68,000 is based on the amount the district did not use of its entitlement in school year 2021–22.

MENU COMPLIANCE AND MEAL PATTERN REQUIREMENTS (REC. 7)

WOCCISD does not require that the FSMC adheres to meal planning guidelines, meal pattern requirements, or cycle menus.

The USDA publication *Contracting with Food Service Management Companies: Guidance for School Food Authorities,* 2016, provides an overview of the federal standards for school districts that contract with FSMCs. Among other contract monitoring responsibilities, the guidance requires districts to retain control of the quality, extent, and general nature of food service, and the meal prices charged by FSMCs. Such control includes developing the menu in accordance with the meal pattern requirements specified in federal regulations, conveying menu adjustment requirements to the FSMC, and monitoring implementation of those adjustments.

According to staff, the FSMC develops menus for WOCCISD's food service program. For school year 2022–23, the child nutrition director used five-week cycle menus developed by the FSMC. Cycle menus are menus written for a specific period and include serving different items each day, then repeating items when the cycle ends. A cycle menu can provide an efficient and cost-effective method for food service staff to plan and deliver a variety of foods that meet certain nutritional requirements to a group of diners, such as students, that receive their meals at the same facility every day. After the first five-week cycle of the school year, the child nutrition director analyzes which items were popular with students and uses that information to adjust menus and ordering for the next five-week cycle. The director also adjusts menus to incorporate USDA foods. The primary method for the director to receive feedback on student preferences is to meet with the student council.

The USDA has established rules to encourage district input and oversight over FSMC menu planning. Pursuant to the U.S. Code of Federal Regulations, Title 7, Section 210.16(a)(8), school districts that use FSMCs must establish an advisory board consisting of students, teachers, and parents to assist in menu planning. The district has not established such a board, and district leadership reported in error that menu planning and execution was the sole responsibility of the FSMC. Because the district does not exercise its oversight authority over menu planning, district staff often do not approve or receive notification of the FSMC's changes to the cycle menu.

During interviews, cafeteria staff reported that WOCCISD does not follow the cycle menu for most weeks of the cycle According to staff, this is because the child nutrition director does not approve food orders that exceed the weekly food budgets, which are frequently not sufficient to purchase all the food products necessary to follow the menus. The FSMC

is financially responsible for the food costs in the district's food service program and the FSMC develops the budget that is included in the district's contract. No district staff were aware of how the FSMC projects the food costs included in the budget.

Managers reported that they often substitute menu items with cheaper, lower-quality foods to meet the budget. No process exists to inform district administration or parents of changes or substitutions to the cycle menu. The menus are posted only on the district's website, and online menus are not updated to show substitutions or changes. The review team observed that the meals served at some campus cafeterias did not match the posted menus.

Cafeteria managers reported that substituting menu items for cheaper items results in the cafeterias serving the same food items repeatedly, which reduces the variety of menu selections throughout the cycle. They also reported that adherence to the FSMC food budget often results in serving meals that do not meet meal pattern requirements or weekly nutritional value requirements. For example, managers could not afford to purchase fresh fruit for an entire week and served fruit juice in its place. In another example, the USDA requires that students in kindergarten to grade five receive servings of vegetables from dark green, red/orange, beans, and peas subgroups. Staff reported that they often are unable to meet the vegetable nutrition requirements because the weekly budget requires them to order the cheapest vegetables, which could be a starch such as potatoes or corn. These items do not include the same nutritional value as the other vegetable subgroups and may not meet USDA requirements.

A properly implemented cycle menu enables districts to save time and labor costs, offer a variety of menu selections, and control food costs. WOCCISD's failure to follow the cycle menu consistently deprives the district and its students of these benefits. In addition, if meals served do not match the posted menus, student participation may decrease, and students may choose to bring lunch from home.

In addition, WOCCISD lacks a process for enforcing menu compliance across campuses, and, therefore, the district does not consistently offer all students access to the same menu options. The review team observed that at some campuses, the entrees and sides varied among serving lines and lunch periods. During each of the six meal periods observed at the elementary school, the two serving lines did not offer the same options. For example, during the second-grade lunch, one serving line served lasagna, watermelon, and strawberries.

The other serving line served lasagna, tomato wedges, and salad. Elementary students are assigned to the serving lines by class and cannot switch lines to access the items offered in the other line. As a result, some students during this lunch period had access only to vegetables, others had access only to fruit, and no students had access to both. During later lunch periods, cafeteria staff frequently changed the entrees offered as items ran out. At various times, lasagna, chicken nuggets, chicken tenders, and popcorn chicken were served as the entree.

The inconsistencies between foods served in the cafeterias also may have contributed to students' dissatisfaction with the district's food quality. The review team observed that most elementary students threw away much of their food. A survey conducted by the review team also showed that 47.1 percent of parents and 28.6 percent of campus staff disagreed with the statement, "The cafeteria's food looks and tastes good."

The USDA's *Contracting with Food Service Management Companies: Guidance for School Food Authorities* states that school districts are responsible for evaluating adherence to the cycle menu and adherence to regulations for all programs, including the meal pattern requirements specified in the U.S. Code of Federal Regulations, Title 7, Sections 210 and 220.

WOCCISD's lack of oversight over menu planning has left district staff unaware of changes to the menus and resulted in decreased food quality in the district's child nutrition program. Without a process to monitor menu compliance and adherence to nutrition requirements, the district cannot deliver the nutritional benefits of its child nutrition programs consistently to all students. Failure to follow the meal pattern requirements reduces the likelihood that young students eat the types and amounts of foods that best support their growth and development. Meeting nutritional requirements is important in WOCCISD, as 90.5 percent of its students are economically disadvantaged. For these students, food received through the CNP may constitute a significant portion of their daily caloric intake.

Additionally, failure to adhere to federal requirements may place the district's reimbursement funds at risk. To monitor that school districts implement the CNP in accordance with state and federal requirements, TDA conducts administrative reviews (AR) of participating school districts. The AR is a standardized review process developed by USDA that includes a comprehensive onsite and offsite evaluation of districts. During TDA's AR, the reviewer determines whether

lunches and breakfasts claimed for reimbursement by the district contain food items or components for the appropriate grade group as required by program regulations. Additionally, reviewers must confirm that every reimbursable meal service line meets the daily and weekly meal pattern requirements for the appropriate age or grade group served. If TDA finds that meals contained insufficient or missing components, the agency could take fiscal action based on the severity and longevity of the identified finding, resulting in a loss of reimbursement funds to the district.

WOCCISD should establish processes for district oversight of the development of menus and quality of food in the district's cafeterias.

To implement this recommendation, the CFO should perform the following actions:

- consult with the FSMC to develop an adequate food budget to meet the district's needs; this could include adjusting contracted fees to support a budget sufficient to support a cycle menu;

- establish an advisory council consisting of students, teachers, and parents to assist in menu planning and approve changes to the cycle menu;

- develop and write into the contract expectations for menu development and approval of changes, including requirements and timelines for how far in advance menu changes should be submitted to the district and requirements for updating posted menus and communicating menu changes to students and parents; and

- develop a process to monitor cycle menu implementation, which should include periodic site visits to cafeterias to observe meals served and confirm that food components match posted menus.

The district could implement this recommendation with existing resources.

PROGRAM COSTS (REC. 8)

WOCCISD does not monitor the Child Nutrition Department's costs.

The FSMC contract is a fixed-rate, per-meal contract, through which the district pays a fixed fee for every breakfast, lunch, snack, and supper meal served. The budget included in the FSMC contract projects district food service program expenses to total $1.5 million for school year 2022–23. Of

these total expenses, $551,665 are the district's direct expenses, which include all costs other than the meal rate fees charged by the FSMC.

Figure 4–3 shows the FSMC contract's designation of program expenses, delineating the specific costs for which the FSMC and the district each are responsible.

As shown in **Figure 4–3**, the FSMC is responsible for all food costs and labor costs for FSMC staff. WOCCISD is responsible for the labor costs for all district employees, which include all Child Nutrition Department staff except for the child nutrition director, who is employed by the FSMC. The district also is responsible for all expendable and nonexpendable supply costs and equipment costs.

Although the district is responsible for most of its Child Nutrition Department costs for labor and supplies, no evidence shows that district staff monitor these cost drivers. For example, it appears that the number of staff per kitchen and the allocation of hours is based on historical staffing assignments rather than on an industry-standard staffing formula. **Figure 4–4** shows a staffing chart for each position in the Child Nutrition Department employed directly by the district.

If a kitchen has a vacancy, the cafeteria manager recruits new staff from the district's substitute pool and recommends candidates for hiring to the child nutrition director. As shown in **Figure 4–4**, cafeteria positions work a variety of set hours, but no district or FSMC staff reported being unaware of how these shifts were determined. District staff reported that they are not involved in hiring decisions or cafeteria staffing assignments, and that staffing management is the responsibility of the child nutrition director. However, during interviews, the child nutrition director said that the district determines the number of staff at each cafeteria. The director reported not knowing how the district determines the number of staff assigned to each kitchen. Cafeteria managers also reported not knowing how the number of staff per kitchen was determined, nor how hours were allocated among individual positions. The district does not adjust staff hours in response to changes in enrollment, student participation, or the number of meals produced.

A common productivity metric for school cafeterias is meals per labor hour (MPLH), which is calculated by dividing the total meal equivalents (ME) for a period by the total number of paid labor hours for the same period. One ME equates to one reimbursable lunch. All other sources of revenue, such as reimbursable breakfasts, snacks, a la carte items, and catering

FIGURE 4–3
WEST ORANGE-COVE CONSOLIDATED ISD DESIGNATION OF CHILD NUTRITION PROGRAM EXPENSES
SCHOOL YEAR 2022–23

EXPENDITURE	FSMC	WOCCISD	NOT APPLICABLE
Food			
Food purchases	X		
U.S. Department of Agriculture (USDA) Foods processing	X		
Processing and payment of invoices (includes USDA Foods processing)	X		
Labor			
Food Service Management Company (FSMC) staff	X		
Salaries/wages	X		
Fringe benefits and insurance	X		
Retirement	X		
Payroll taxes	X		
Workers' compensation	X		
Unemployment compensation	X		
West Orange-Cove Consolidated ISD (WOCCISD) staff		X	
Salaries/wages		X	
Fringe benefits and insurance		X	
Retirement		X	
Payroll taxes		X	
Workers' compensation		X	
Unemployment compensation		X	
Other Expenses		X	
Paper/disposable supplies		X	
Smallwares		X	
China/silverware/glassware		X	
Initial inventory		X	
Replacement during operation		X	
Telephone		X	
Local		X	
Long-distance		X	
Mobile		X	
Uniforms		X	
Linens			X
Laundry			X
Trash Removal		X	
Kitchen		X	
Dining Area		X	
Premises		X	
Pest Control		X	
Equipment Replacement		X	
Nonexpendable		X	
Expendable		X	

SOURCE: West Orange-Cove Consolidated ISD, Aramark Educational Services, LLC, Request for Proposal and Contract, Program Year 2022–23, Exhibit D.

sales, have a conversion factor to calculate the equivalent of 1.0 ME.

In a 2019 publication, *How to Calculate and Establish Meals per Labor Hour*, the School Nutrition Association (SNA), a national organization of school nutrition professionals, notes that the calculation of MPLH is important because it provides the following benefits:

- measures the financial success of the school nutrition program;

- monitors the labor efficiency of operations;

- determines appropriate staffing levels;

- guides the labor budget; and

- stimulates operational changes.

Best practices promoted by the SNA recommend that the MPLH at a campus should range from 14.0 to 18.0 MEs. WOCCISD does not calculate or track MEs or MPLH to monitor staffing costs, nor does the FSMC provide these data in its monthly performance statements. As a result, the review team could not determine whether WOCCISD staffing levels meet industry standards for MPLH.

When a food service department does not evaluate staffing regularly based on industry standards, the district is unable to determine whether it is using its resources efficiently. The WOCCISD's Child Nutrition Department is hindered in its ability to determine appropriate staffing levels without a process to use productivity as a basis for a staffing formula.

In addition to staffing, the district does not monitor the use of the Child Nutrition Department's equipment and supplies. The FSMC contract stipulates that the district should conduct beginning and closing inventories of all nonexpendable supplies and capital equipment it owns. During inventories, the district should take stock of silverware, trays, chinaware, glassware, and kitchen utensils and all furniture, fixtures, and dining room equipment used in the nutrition program. The FSMC is responsible for accounting for any difference between the beginning inventory and the ending inventory and must compensate the district for any shortfall in inventory not arising from normal use or theft, fire, or other loss beyond the FSMC's control.

Although the district is responsible for all supply and equipment costs, it has not established a process to inventory these items. Cafeteria managers are required to

FIGURE 4–4
WEST ORANGE-COVE CONSOLIDATED ISD CHILD NUTRITION DEPARTMENT STAFFING CHART SCHOOL YEAR 2022–23

POSITION	HOURS WORKED PER DAY	STAFF
North Early Learning Cafeteria Staffing (Elementary)		
Manager	8.0	1
Food Service Worker	7.0	1
Food Service Worker	6.5	2
West Orange-Stark Elementary School		
Manager	8.0	1
Food Service Worker	6.5	6
Food Service Worker	6.0	3
West Orange-Stark Middle School		
Manager	8.0	1
Food Service Worker	6.5	3
Food Service Worker	6.0	2
West Orange-Stark High School		
Manager	8.0	1
Food Service Worker	6.5	3
Food Service Worker	6.0	4

SOURCE: West Orange-Cove Consolidated ISD, Aramark Educational Services, LLC, Request for Proposal and Contract, Program Year 2022–23.

conduct monthly inventories of food and enter this information into the FSMC's nutrition management software. The purpose of these inventories is to determine the district's food needs for upcoming menus. Staff reported being unaware of an inventory process for anything other than food and disposable supplies. In the absence of a monitoring process for supplies and equipment owned by the district, WOCCISD cannot hold the FSMC accountable for safeguarding the district's property.

WOCCISD should develop and implement a food service staffing formula based on industry standards and conduct physical inventories of Child Nutrition Department's nonexpendable supplies and capital equipment.

The CFO should coordinate with the child nutrition administrative assistant to determine a regular schedule for calculating MPLH at each campus and compare calculations directly to data from past months and years. After the district has established a process for regularly accounting MPLH, the CFO should assess the data and

determine whether to adjust staffing levels. The CFO should set MPLH targets for each campus and direct the child nutrition director to align staffing hours to achieve those goals.

As part of this process, the CFO should coordinate with the child nutrition director to determine the staffing hours that best support each cafeteria's needs. Effective districts often assign a full-time schedule to the cafeteria manager and a lead staff, while other positions could work part time during the busiest hours.

The CFO and the child nutrition administrative assistant also should develop a process for conducting physical inventories at the beginning and end of each school year to account for the district's nonexpendable supplies, furniture, and equipment.

A fiscal impact cannot be assumed until the child nutrition director determines the appropriate staffing levels for department staff. The Child Nutrition Department could achieve savings by implementing regular MPLH assessments and maintaining best practices.

ADDITIONAL OBSERVATIONS

The Legislative Budget Board's (LBB) School Performance Review Team visisted the district in October 2022. During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

BREAKFAST IN THE CLASSROOM

During school year 2016–17, WOCCISD implemented breakfast in the classroom at West Orange-Stark Elementary School. This service model is a best practice to maximize participation in the SBP, which staff report has increased breakfast participation at this campus; however, the district has not considered expanding breakfast in the classroom districtwide.

In addition to increasing CNP revenues, serving breakfast in the classroom provides numerous benefits to students. According to the nonprofit organization Food Action and Research Center, students who receive breakfast at school demonstrate improved academic performance, exhibit fewer behavioral and psychological issues, and record lower rates of absence and tardiness. However, barriers such as transportation logistics decrease participation in breakfast

served in the cafeteria before school starts. Making breakfast part of the school day by offering classroom service is cost-effective, increases access to breakfast, and is associated with fewer disciplinary office referrals. WOCCISD should consider implementing a districtwide breakfast service model such as breakfast in the classroom or grab-and-go breakfast to help incorporate breakfast into students' morning schedules.

NUTRITION EDUCATION AND PROMOTION

WOCCISD's student health advisory council oversees the district's wellness policy and plan. The council meets regularly to review and make necessary revisions to the plan's goals, and the plan is shared with district and campus staff and posted to the district's website. Although the district has established a wellness policy, opportunities exist to improve nutrition education and promotion in the district. At the North Early Learning Center, the nurse and contracted dietitian collaborate to promote nutrition education in several ways, including nutrition newsletters, child-friendly cookbooks, and parent nutrition education classes. These nutrition education efforts are part of the district's Head Start Program and are limited to the North Early Learning Center campus. The review team did not find evidence of similar efforts for nutrition education and promotion at any other campus. At the time of the review team's visit, the district's online menus did not contain any information about the nutritional contents of the meals. In addition, the district does not post menus in any of the cafeterias. The review team observed that campus dining rooms have bulletin boards and wall space that could display menus and nutrition information, but almost no nutritional content or educational materials appear in these areas.

Team Nutrition is an initiative of the USDA Food and Nutrition Service to support CNP through training and technical assistance for nutrition education for students. Districts that participate in the NSLP can enroll in the Team Nutrition School program, which provides access to nutrition education materials and opportunities to collaborate with other Team Nutrition schools. All WOCCISD campuses are eligible to register for this program through the USDA. WOCCISD's Child Nutrition Department should develop an annual plan for nutrition education and menu displays in campus cafeterias. All campuses should enroll in USDA's Team Nutrition school program to receive free educational materials throughout the school year.

FISCAL IMPACT

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

The LBB School Performance Review Team identified the following fiscal impact for **Recommendation 6**.

RECOMMENDATION	2023–24	2024–25	2025–26	2026–27	2027–28	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
4. CHILD NUTRITION MANAGEMENT							
6. Require the food service management company to follow a process that maximizes the use of entitlement funding and the receipt of full credit for USDA Foods in the district's food service program.	$68,000	$68,000	$68,000	$68,000	$68,000	$340,000	$0
Total	$68,000	$68,000	$68,000	$68,000	$68,000	**$340,000**	**$0**

5. SAFETY AND SECURITY MANAGEMENT

ACCOMPLISHMENT

♦ West Orange-Cove Consolidated Independent School District (WOCCISD) significantly improved campus safety processes throughout the district.

FINDINGS

♦ WOCCISD lacks a process to align its safety and security plans and committee with all statutory requirements and best practice standards.

♦ WOCCISD lacks an effective process for evaluating its disciplinary alternative education program.

♦ WOCCISD has not established staffing standards for campus security or student services staff.

RECOMMENDATIONS

♦ **Recommendation 9: Align the district's processes for developing and updating safety plans and conducting safety and security committee activities with statutory requirements and best practices.**

♦ **Recommendation 10: Establish a process to monitor and evaluate the effectiveness of the district's disciplinary alternative education program.**

♦ **Recommendation 11: Hire an additional campus safety officer to be stationed at North Early Learning Center and establish staffing standards for the WOCCISD Police Department and Student Services Department.**

BACKGROUND

One of the stated objectives of public education in the Texas Education Code, Chapter 4, is for campuses to "maintain a safe and disciplined environment conducive to student learning." The purpose of safety and security at an independent school district is to identify and minimize threats to students', faculty's, and staff's physical and mental well-being. Working together, district leaders, campus principals, facility managers, transportation supervisors, and safety and security staff identify risks and develop plans to mitigate threats. This approach helps maintain a safe learning and working space for all those on campus.

A comprehensive approach to planning for physical security considers systems to lock interior and exterior doors, monitor

FIGURE 5–1
WEST ORANGE-COVE CONSOLIDATED ISD SAFETY AND SECURITY ORGANIZATION, SCHOOL YEAR 2022–23
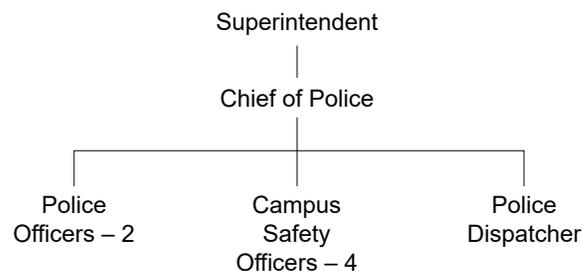
Sources: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

properties, protect assets, monitor grounds, police the area, and provide emergency response when necessary. Emergency and disaster-related procedures must address fire protection, environmental disasters, communication systems, crisis management, and contingency planning. Additionally, a school district must consider behavior and discipline of students to keep students and staff safe mentally, emotionally, and physically.

WOCCISD provides safety and security services for five instructional facilities and two noninstructional facilities. The district's five instructional facilities include North Early Learning Center, West Orange-Stark Elementary, West Orange-Stark Middle School, West Orange-Stark High School, and West Orange-Stark Academic Alternative Center (AAC). West Orange-Stark High School also houses West Orange-Stark Early College High School. AAC is located on the same property as the district administration building and serves as WOCCISD's disciplinary alternative education program (DAEP). The two noninstructional facilities include the district administration building and West Orange Transportation building.

In 2019, WOCCISD established its own police department, which is housed in the middle school. At the time of the review, the chief of police oversaw the WOCCISD Police Department which included two police officers, four campus safety officers, and a dispatcher. Each campus, except for North Early Learning Center, was served by at least one police officer and one campus safety officer. The chief of police served as the police officer at the middle school. **Figure 5–1** shows the organization of the district police department at the time of the review.

Police officers and campus safety officers regularly check facilities, maintain security of the buildings, and assist with student behavioral issues as needed. Additionally, police officers investigate reports and can press charges. This security staffing has increased significantly districtwide beginning in 2022.

Safety equipment installed throughout the district includes electromagnetic locks on doors, walk-through and handheld metal detectors, interior and exterior cameras for all buildings, door cameras with two-way speaker systems to campus administrative offices and electronically controlled entries for visitor management at all instructional facilities, alarms, and automated external defibrillators on each campus. Most of the security equipment is relatively new because the district installed it after establishing the WOCCISD Police Department in 2019.

In school year 2021–22, WOCCISD began implementing the following additional safety procedures at all instructional facilities:

- using metal detectors at all entry points;

- requiring students to use clear backpacks; and

- checking doors daily to ensure the electromagnetic locks are functioning properly.

During the Legislative Budget Board's School Performance Review Team's onsite visit in October 2022, district staff reported feeling confident in these increased safety measures.

The physical security of the instructional facilities in the district is effective and consistent across campuses. While onsite, the review team observed that all doors at each instructional facility were locked, and most schools have one or more signs directing visitors to the front entrance of campus facilities, a common best practice for controlling the entry of visitors into and out of buildings. The exterior of each campus has monitoring cameras installed, and the review team observed additional staff or security outside most instructional facilities. The process for entering each campus was consistent across all campuses.

During the onsite visit, the review team observed that most campuses had fencing to protect certain places from unwanted visitors. The grounds of North Early Learning Center and the elementary school include playgrounds, and North Early Learning Center has fencing surrounding its playground facilities. The elementary school is surrounded by undeveloped land, and its playground is not visible directly from the campus

access point. The middle school and high school have fencing around the sports facilities and practice fields.

The high school and middle school each consist of several buildings, which often requires students to travel between buildings during class changes. At these campuses, the review team observed that teachers or other campus staff were present at all entry and exit points at each campus when students transitioned between buildings. All the doors at each campus were secured with electromagnetic locks that can be unlocked only by staff badges or by staff in the campus administrative offices, who use cameras and two-way speakers to monitor visitors at the doors and grant access, when appropriate, through a buzzer system. During class changes, the doors are unlocked using a detector inside and above the door frame.

During the past five years, WOCCISD has increased its spending on security and monitoring services. The district recorded a significant increase in funding for security for school year 2020–21, which coincides with the first, full school year the district had its own police department. **Figure 5–2** shows WOCCISD's actual spending on safety per student and the state average for comparison from school years 2017–18 to 2021–22. While the district originally spent less than the state average on security per student, WOCCISD's actual spending per student has increased significantly and has approached the state average during the past two school years.

The district also strives to protect students and staff through behavioral management programs, which teachers and administrators operate to maintain the emotional safety of students. CHAMPS is a classroom management system that stands for: conversation, help, activity, movement, participation, success. Capturing Kids' Hearts is a professional development model that trains teachers and administrators to better connect and engage with their students. Most staff agree that CHAMPS and Capturing Kids' Hearts are effective when implemented by the teachers. Some campuses employ additional student behavioral programs, including the Mustang Money reward system at the elementary school and middle school, through which students who exhibit positive behaviors may receive play money to purchase rewards. The middle school also operates Personal Best, which encourages students to be the best versions of themselves.

In addition to programs addressing student behavior, the district has discipline coordinators at each campus who participate in the discipline referral system through activities that range from assessing and investigating incidents to

FIGURE 5–2
WEST ORANGE-COVE CONSOLIDATED ISD SAFETY SPENDING PER STUDENT AND STATE COMPARISON
SCHOOL YEARS 2017–18 TO 2021–22
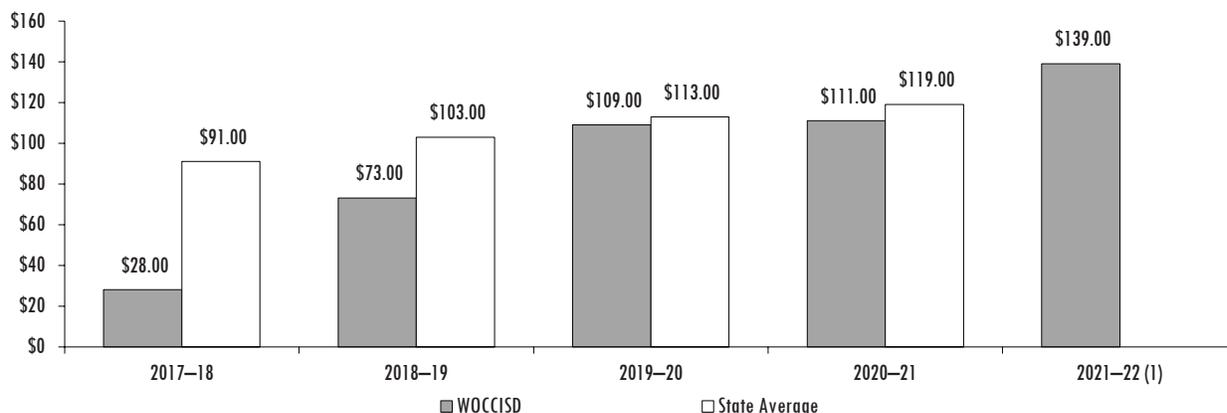
NOTE: School years 2017–18 to 2020–21 amounts show actual financial data. School year 2021–22 shows budgeted financial data; actual data and state average were not available as of October 2022.
SOURCES: Texas Education Agency, Public Education Information Management System, Financial Data, school years 2017–18 to 2021–22; West Orange-Cove Consolidated ISD, October 2022.

FIGURE 5–3
WEST ORANGE-COVE CONSOLIDATED ISD DISCIPLINE REFERRAL DATA, SCHOOL YEARS 2018–19 TO 2021–22

GROUP	2018–19	2019–20	2020–21	2021–22	PERCENTAGE CHANGE FROM 2018–19 TO 2021–22
Total Student Population	2,810	2,795	2,887	2,941	4.7%
Total Discipline Population	768	597	442	571	(25.7%)
Total Discipline Record Count	2,502	1,790	1,052	1,371	(45.2%)
Out-of-school Suspension	512	470	293	421	(17.8%)
In-school Suspension	1,841	1,159	664	830	(54.9%)
Disciplinary Alternative Education Program	134	65	39	87	(35.1%)

NOTE: In-school suspension data does not include data for partial days.
SOURCES: Legislative Budget Board, School Performance Review Team; Texas Education Agency, Public Education Information Management System, Student Discipline Report, school years 2018–19 to 2021–22; West Orange-Cove Consolidated ISD, October 2022.

assigning the consequences. All campuses use a discipline matrix to aid in the process and have at least one campus administrator serving as a discipline coordinator.

WOCCISD also has a districtwide student code of conduct, and each campus has a school-specific handbook that aids in the management of student behavior and the overall safety of the district. During interviews, staff reported that the student code of conduct was established by district administration, and campus administrators are authorized to edit and update the code of conduct to better address their specific needs. For example, one campus administrator reported recently changing campus rules on non-natural-colored hair after receiving feedback from students. All changes to the code of conduct must be approved by the WOCCISD Board of Trustees, and staff reported that the process is collaborative and the board typically honors the campus administration's requests.

During interviews, staff overwhelmingly reported that student behavior had improved across the district during the previous five school years. Available data supports these reports, and **Figure 5–3** shows WOCCISD's discipline referral rates from school years 2018–19 to 2021–22.

As shown in **Figure 5–3**, WOCCISD's discipline referrals decreased overall during school years 2018–19 to 2020–21. After a slight increase during school year 2021–22, the referral rate did not return to the number of referrals reported during school year 2019–20.

Each campus staffs at least one counselor. The elementary school employs two counselors, and the high school employs three. Counselors' duties include scheduling, testing and assessments, data entry, and academic and emotional counseling. Counselors are evaluated by the campus principals, although counseling services are coordinated by the director of student services. WOCCISD also partners with Communities in Schools (CIS), a nonprofit organization that brings community resources directly into schools through trained coordinators who connect students with additional supports to help them learn, advance in grade level, and graduate. WOCCISD has a CIS counselor at each campus.

Additionally, each campus has one assigned nurse. The assistant superintendent of student services oversees the district's nursing services. Nurses review immunization status, safely store and distribute student medication, maintain the safety and confidentiality of student medical records, and provide required student training. The nursing staff annually trains students in grades seven to 12 in life-saving emergency care to stop bleeding in trauma victims. During interviews, staff said that the district plans to establish a community clinic at the elementary school, and many staff reported being happy with the nursing services provided in the district.

DETAILED ACCOMPLISHMENT

SAFETY IMPROVEMENTS

WOCCISD significantly improved campus safety processes throughout the district.

During the past three years, WOCCISD has established its own police department, hired seven staff to the department, and implemented the following safety policies and procedures:

- installing metal detectors at entry points at each campus;

- assigning administrators at each campus to oversee facility safety;

- improving the locking mechanisms of regularly used doors at each campus; and

- implementing processes for regularly checking and maintaining safety at each campus.

At each campus visit, the review team observed a consistent visitor management system and well-secured facilities. During interviews, district staff reported feeling safe as a result of the districtwide security improvements.

The review team observed that all the campuses were secure. To enter any campus, a visitor must ring a doorbell or buzzer at the front entrance of a facility. The buzzer notifies staff at the campus administrative office, who can view the entrance through a monitoring camera and use a two-way speaker to ask the visitors their purpose for being on campus before determining whether to unlock the door remotely. When visitors are inside the entrance's security vestibule, a WOCCISD Police Department officer or campus safety officer ushers the visitors through a walk-through metal detector or scans the visitors with a metal-detector wand and inspects any bags they carry.

Visitors then must sign in on an entry log at the front desk, which is protected by plexiglass or located behind a wall for safety, and present identification to administrative office staff. Staff check the visitor's identification through the Raptor Security System, which conducts a background check through a criminal and sex offender database. When the system approves the check, it prints a sticker badge displaying the visitor's name and photograph from the identification card. After signing in, the visitor may pass through the interior doors and into the facility. District police or safety officers escort visitors who need directions.

The review team repeated this process four times at each campus, and each time it was consistent. One campus also required visitors to wear a lanyard identifying their status as visitors. North Early Learning Center's front camera was under repair at the time of the review team's visit, but staff conducted all the other standard security procedures.

Each campus has assigned an administrator who oversees campus safety and security functions, including prevention and emergency preparedness. These administrators are responsible for scheduling required safety drills, such as those preparing for fire, inclement weather, lockdown, and lockout occurrences. These administrators also are responsible for completing assessments before and after each completed drill. Staff reported that their campuses had completed at least one drill successfully during school year 2022–23.

The district regularly completes the Texas School Safety Center (TxSSC) audits, which statute requires districts in Texas to conduct every three years. WOCCISD completed its most recent audit in 2020. The chief of police is responsible for completing these audits. Additionally, each of the campus administrators responsible for overseeing safety and security functions and supervising safety officers regularly audits the condition of all campus locks and doors. In addition,

Mustang Tips is a campuswide safety program through which students may report any suspicious behavior, bullying, or other safety concerns anonymously.

In a survey of district and campus staff and parents, 85.9 percent of respondents reported that the district and classrooms are safe spaces for students and teachers.

DETAILED FINDINGS

SAFETY AND SECURITY PLANS AND COMMITTEE (REC. 9)

WOCCISD lacks a process to align its safety and security plans and committee with all statutory requirements and best practice standards.

The Texas Education Code, Section 37.108, requires all school districts to adopt and implement a multihazard emergency operations plan (EOP) that addresses how a district will prevent, mitigate, prepare for, respond to, and recover from potential natural disasters or other emergencies. An EOP assigns responsibilities to individuals within the district and determines how actions, internally and externally, will be coordinated. WOCCISD has assigned the district's chief of police to oversee the EOP development and implementation. The EOP also outlines any memorandums of understanding (MOU) that the district has with outside organizations. WOCCISD's EOP lists that the district has MOUs with each of the three cities in which its campuses are located: West Orange, Pinehurst, and Orange. The district also has MOUs with the Orange County Sheriff's Office and Crime Stoppers of Southeast Texas, a community-based partnership among citizens, law enforcement, and media organizations to reduce crime and work toward the arrest and conviction of criminals.

WOCCISD's school year 2022–23 EOP meets most statutory requirements but is lacking in several areas. For example, most of WOCCISD's campuses are within 1,000 yards of a railroad track; however, the district's EOP does not contain a train derailment plan as required by the Texas Education Code, Section 37.108(d). The importance of having such a plan is exhibited by the experience of nearby Little Cypress-Mauriceville Consolidated ISD, which was required to evacuate two of its campuses after a train derailment leaked petroleum and a corrosive product in October 2020.

WOCCISD's EOP also does not specify a clear chain of command, which could hamper the district's ability to respond effectively during an emergency. The Texas Education Code, Section 37.108(f)(1), requires all EOPs to specify a chain of command of district staff responsible for making decisions during a disaster or emergency. A clear chain of command is critical to maintaining consistent and precise communication to staff and students, and to ensuring that staff understand their roles and responsibilities. WOCCISD's EOP outlines the emergency responsibilities of several positions across the district, including the district's emergency management coordinator, superintendent, campus principals and counselors. This documentation serves as a form of chain of command, but an organizational chart explicitly outlining to whom staff should report during an emergency would provide clarity. Additionally, the district's EOP states, "Identify a chain of command for emergency incidents and order of succession to ensure operational redundancy for an effective response and to maintain primary functions" as a responsibility for both district and campus administrators. The district did not provide the review team with supplemental documentation or evidence that those identifications have been made in the district or at each campus. This lack of identification intensifies the district's need for a written organizational chart and clear chain of command at all levels for emergency situations.

The Texas Education Code, Section 37.108(f)(6), also requires that a district's EOP includes "provisions for supporting the psychological safety of students, district personnel, and the community during the response and recovery phase following a disaster or emergency situation." WOCCISD's school year 2022–23 EOP is deficient in this regard. The plan mentions providing student services and other support services to students and staff after an emergency; however, it does not discuss any specific psychological aid that WOCCISD would provide. Additionally, the EOP does not mention psychological safety trainings, such as suicide prevention.

The Texas Education Code, Section 37.108(f)(8), requires that a district's EOP includes "the name of each individual on the district's school safety and security committee … and the date of each committee meeting during the preceding year." WOCCISD's current EOP lists the names of district staff serving on the safety and security committee (SSC), but it does not record the dates of the previous year's SSC meetings.

WOCCISD's school year 2022–23 EOP also does not include the following best practices outlined by TxSSC in its EOP checklist:

- an approval and implementation page;

- a complete policy on emergency purchasing; and

- a district hazard analysis summary data.

FIGURE 5–4
WEST ORANGE-COVE CONSOLIDATED ISD'S (WOCCISD) SAFETY AND SECURITY COMMITTEE (SSC) MEMBERSHIP COMPARED TO STATUTORY REQUIREMENTS, 2022

MEMBERSHIP REQUIRED BY THE TEXAS EDUCATION CODE	WOCCISD SSC MEMBERSHIP	WOCCISD POSITION
One or more representatives of an office of emergency management of a county or city in which the district is located	**No**	
One or more representatives of the local police department or sheriff's office	**No**	
One or more representatives of the district's police department, if applicable	**Yes**	WOCCISD Chief of Police
The president of the Board of Trustees	**Yes**	Board President
A member of the district's Board of Trustees other than the president	**Yes**	Two Board Trustees
The district's superintendent	**Yes**	Superintendent of Schools
One or more designees of the district's superintendent, one of whom must be a classroom teacher in the district	**Yes**	Director of Maintenance
		Director of Student Services
		Director of Technology
		Director of Transportation
		Principal
		Three Assistant Principals
		Registered Nurse
		Four Teachers
Two parents or guardians of students enrolled in the district	**Unknown**	

Sources: The Texas Education Code, Section 37.109(a-1); West Orange-Cove Consolidated ISD, October 2022.

In addition to the EOP, each district must adopt a cybersecurity policy, pursuant to the Texas Education Code, Section 11.175. The policy must address steps the district will conduct to secure its infrastructure against cyberattacks and other cybersecurity incidents, determine cybersecurity risks, and implement mitigation planning. WOCCISD Board Policy CQB (LOCAL) requires the district to develop a cybersecurity plan, designate a cybersecurity coordinator, and determine cybersecurity training needs. WOCCISD has a designated technology director who oversees the district's school year 2022–23 cybersecurity plan.

This plan meets the basic statutory requirements, but it lacks some practical applications to test vulnerabilities and detect threats in the district. Some of the best practices established by Texas Association of School Boards (TASB) include continuous assessment for risk vulnerabilities, detecting potential threats, and providing education and training.

Failure to assess the district's network for vulnerabilities places student and staff information at risk to potential data breaches. In summer 2021, Texas Education Agency (TEA)

reported that 70 districts had experienced some form of cybersecurity breach since calendar year 2019. Also in 2021, more than two dozen Texas school districts were hacked.

Additionally, the district is not meeting statutory requirements concerning the membership of its SSC and postings of notice for SSC meetings. A safety and security committee is responsible for developing and assisting in implementing the district's EOP, providing recommendations on how to improve the EOP, supporting the district in addressing issues found during the district safety and security audit, and consulting with local law enforcement agencies on methods to increase law enforcement presence near district campuses. WOCCISD has an active SSC that met three times from July 2021 to spring 2022 and had met once during school year 2022–23 as of October 2022. The Texas Education Code, Section 37.109(a-1), specifies the composition of the district's SSC. **Figure 5–4** shows the statutorily required members and the WOCCISD's SSC members.

WOCCISD's list of committee members also includes a few names that are not listed on the school's online staff directory.

It is unclear whether these members are parents or guardians or whether the list is outdated and these members are former staff. It is also unclear whether any of the teachers or staff currently serving on the district's SSC currently have a student or students enrolled in the district to meet the requirement of two parents or guardians serving on the committee.

Additionally, the Texas Education Code, Section 37.109(d), requires the district to post notice of SSC meetings in the same manner as for its board meetings, which are subject to statutory open meetings requirements. Currently, WOCCISD does not post any notice of its SSC meetings.

WOCCISD should align its processes for developing and updating safety plans and conducting SSC activities with statutory requirements and best practices.

To implement this recommendation, the superintendent should require the chief of police to develop a checklist enumerating all the statutorily required elements of the district's EOP. The district could access several resources to help establish its EOP checklist, such as TASB's "Adopting and Implementing a Multihazard Emergency Operations Plan (EOP)," and TxSSC's website, which contains various materials including a checklist regarding responsibilities related to train derailment. Waco ISD's EOP provides an example of an organization chart for incident responses and order of succession if staff are not available to serve in their assigned capacities. The SSC should use the checklist developed by the chief of police when reviewing the district's EOP. Additionally, the chief of police should review this checklist following the legislative session to align the information with any statutory changes.

To further implement this recommendation, WOCCISD's technology director should develop a checklist for updating the cybersecurity plan. The director should update this checklist each summer to incorporate new statutory requirements, new policies specific to the district, and best practices. TxSSC, TASB, and the Texas Department of Information Resources provide templates, guides, and resources for the development of a cybersecurity plan. After the plan is developed, the SSC should review it, and the technology department should implement its use.

WOCCISD should review its SSC to align its composition and meeting-posting practices pursuant to the Texas Education Code, Section 37.109.

The district could implement this recommendation with existing resources.

DAEP EVALUATION (REC. 10)

WOCCISD lacks an effective process for evaluating its disciplinary alternative education program (DAEP).

The Texas Safe Schools Act of 1995 established that all Texas public school districts must have a DAEP to serve as a temporary, alternative education setting for students removed from their home campuses for disciplinary reasons. The Texas Education Code, Chapter 37, details how DAEPs must meet the educational and behavioral needs of students assigned to them. Additionally, the Texas Administrative Code, Title 19, Part 2, Chapter 103, Subchapter CC, Rule 103.1201, outlines the standards for operating a DAEP program. TEA also has outlined several best practices tracking DAEP data and evaluating the program.

The director of student services oversees the West Orange-Stark Academic Alternative Center (AAC), which serves as the district's DAEP. As of school year 2022–23, the district reported that the DAEP staffs two teachers, an instructional aide, and an administrative assistant.

Before being placed in AAC, the district assesses a student's threat level. The threat assessment process, established by the director of student services in school year 2019–20, is a collaboration between the assistant principals, counselor(s), and registrar. This group meets to discuss the students who exhibit problem behaviors and the potential for a change of placement, such as moving the student to in-school suspension, out-of-school suspension, or the DAEP. If placement to the DAEP is determined, the group will notify the director of student services. If the student has special education needs, the threat assessment group will notify DAEP staff. Counselors at the student's home campus are required to provide any services necessary to assist with re-entry to the student's home classroom after returning from DAEP placement.

WOCCISD reported the following student behavior violations as the most reported reasons for DAEP placements during school year 2021–22:

- fighting;
- use or possession of a vaping device;
- drug use or possession;
- threat to a school employee;
- student code of conduct violation;
- public lewdness;

- safety threats from students;

- possession of a look-alike weapon (e.g., a realistic toy gun); and

- invasive video recording.

Staff reported that the length of time a student spends at the DAEP depends on the offense and whether the student previously had been placed there. The average DAEP placement time was 38.0 days according to district data, and staff reported that a typical placement ranges from 15 days to 60 days.

Figure 5–5 shows the elementary school disciplinary matrix. Similar disciplinary matrices are used at other campuses. The matrix outlines the types of offenses and number of occurrences required before a student is placed in the DAEP. Based on reported disciplinary data, WOCCISD campuses adhered to the referral process shown for DAEP placements.

For each DAEP placement, school districts must report to TEA information about the student, the offense, and the placement, as specified in the Texas Education Code, Section 37.020. DAEP data tracks student information based on the campus of origin, gender, ethnicity, emergent bilingual/ English learner status, duration of time on placement at the DAEP, and the type of conduct that resulted in the placement. WOCCISD elementary school staff reported that they rarely place students at the DAEP. This practice is represented in the district's data for school year 2021–22, which indicates that the program served two students from the elementary school, 45 students from the middle school, and 83 students from the high school.

Figure 5–6 shows trends in the number of student discipline referrals and the total discipline population for WOCCISD from school years 2017–18 to 2021–22. The data show an increase in referrals to all disciplinary settings from school

years 2020–21 to 2021–22. However, the number of discipline referrals, including DAEP placements, decreased overall at WOCCISD from school years 2018–19 to 2020– 21. When the review team asked staff at different levels of responsibility from each campus to what they attributed this decrease, many staff reported being unaware that discipline referral rates had decreased.

WOCCISD does not track recidivism rates or evaluate the effects of DAEP referrals on students' academic outcomes; nor does the district have a formal process to evaluate program success, such as setting goals or gathering feedback. During interviews, staff reported that the lack of analysis of DAEP student data and overall evaluation of the DAEP program were areas in need of improvement for the district.

The purpose of a DAEP is to provide temporary student placements for behavior management, often as alternatives to suspension or expulsion. The goal is for students to return to and succeed in their regularly assigned classrooms and schools. However, without a process to assess recidivism rates among students or whether DAEP referrals are limiting a student's academic progress, it is not possible to determine whether the program is achieving this goal.

Additionally, evaluating the DAEP enables a district to monitor whether students are being disciplined fairly and consistently. For example, during school year 2021–22, 16.1 percent of students with disabilities were placed in WOCCISD's DAEP despite constituting only 11.3 percent of the total student population. African American students constituted 54.1 percent of WOCCISD's total student population in school year 2021–22; however, African American students accounted for 69.2 percent of the students placed in the DAEP. Like their African American counterparts, the data was similar for the proportion of white students in the district, who accounted for 16.2 percent of the total student population and 20.0 percent of the DAEP

FIGURE 5–5
WEST ORANGE-STARK ELEMENTARY SCHOOL'S DISCIPLINE MATRIX, SCHOOL YEAR 2022–23

OFFENSE	FIRST OFFENSE	SECOND OFFENSE	THIRD OFFENSE	SUBSEQUENT OFFENSE
Attendance				
Skipping class	In-school suspension (ISS), 1 day	ISS, 2 days	OSS	OSS
Leaving campus unauthorized	ISS, 1 day	ISS, 2 days	ISS, 3 days	OSS
Leaving class unauthorized	ISS, 1 day	ISS, 2 days	ISS, 3 days	OSS
Refusal or failure to attend ISS	ISS, 1 day	Out-of-school suspension (OSS), 2 days	OSS, 3 days	OSS / disciplinary alternative education program (DAEP)

FIGURE 5–5 (CONTINUED)
WEST ORANGE-STARK ELEMENTARY SCHOOL'S DISCIPLINE MATRIX, SCHOOL YEAR 2022–23

OFFENSE	FIRST OFFENSE	SECOND OFFENSE	THIRD OFFENSE	SUBSEQUENT OFFENSE
Altercation				
Verbal altercation	ISS, 2 days	OSS, 3 days	OSS, 3 days	OSS/DAEP
Fighting: mutual combat	ISS, 2 days	OSS, 3 days	OSS, 3 days	OSS/DAEP
Fighting: assault	OSS, 3 days/DAEP	In accordance with policy	In accordance with policy	In accordance with policy
Profanity toward staff	OSS, 3 days	OSS, 3 days	DAEP	DAEP
Bullying/Harassment				
Bullying or Harassment	Administrative investigation; discipline based on individual basis aligned with West Orange-Cove Consolidated ISD (WOCCISD) Student Code of Conduct	Administrative investigation; discipline based on individual basis aligned with WOCCISD Student Code of Conduct	Administrative investigation; discipline based on individual basis aligned with WOCCISD Student Code of Conduct	Administrative investigation; discipline based on individual basis aligned with WOCCISD Student Code of Conduct
Conduct				
Dress code	ISS until clothes changed / lunch detention	ISS until clothes changed / afterschool detention	ISS	OSS
Gambling	ISS, 3 days	OSS	OSS	OSS
Cell phone / electronics	The teacher collects the student's item; the item is returned at the end of class. The district contacts the student's parent. If the student refuses to submit the item to the teacher, the district contacts the student's parent, and the district charges the student a $15 administrative release fee.	The teacher collects the item to be held in the campus administrative office. The district releases the item to the student at the end of the school day.	The teacher collects the item. The district contacts the student's parent. The district charges the student a $15 administrative release fee.	The teacher collects the item. The district releases the item to the student's parent only upon payment of a $15 administrative release fee.
Disruptions during ISS	OSS	OSS	OSS	OSS
Academic dishonesty	The student earns no credit for a minor grade; the student may retake the assignment for 50 for major grades; the district contacts the student's parent	The student earns no credit for the assignment; the district contacts the student's parent; the student is placed in ISS	The student earns no credit for the assignment; the district contacts the student's parent; the student is placed in for 1 to 3 days	The student earns no credit for the assignment; the district contacts the student's parent; the student is placed on suspension
Classroom disruption	The teacher conducts an intervention, and the district contacts the student's parent	The teacher conducts an intervention, and the district contacts the student's parent	Administrative discipline ISS	Administrative discipline ISS or OSS

NOTES:
(1)   Campus administrators have final discretion in the application of these consequences and reserve the right to adjust actions as necessary.
(2)   Discipline for special education students will be conducted in accordance with the students' individualized education programs, the district Student Handbook, and the district Student Code of Conduct.
(3)   Students in kindergarten to grade two may not be suspended. The district will explore behavior reward systems, pictorial schedules, and response to intervention for behavior plans as needed.
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

FIGURE 5–6
WEST ORANGE-COVE CONSOLIDATED ISD DISCIPLINE REFERRALS
SCHOOL YEARS 2018–19 TO 2021–22
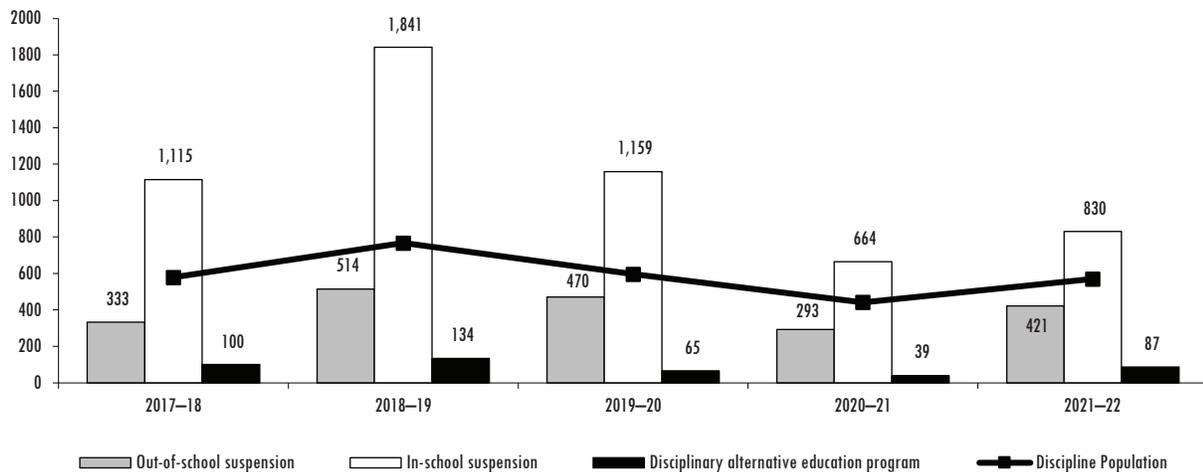
NOTE: In-school suspension data does not include data for partial days.
SOURCES: Legislative Budget Board, School Performance Review Team; Texas Education Agency, Public Education Information Management System, Student Discipline Report, school years 2018 to 2022; West Orange-Cove Consolidated ISD, October 2022.

referrals in school year 2021–22. Conversely, Hispanic students constituted 21.6 percent of WOCCISD's student population, but only 10.8 percent of DAEP referrals. The data also shows that boys were referred to the DAEP at more than double the rate of girls.

Without an effective process for assessing its DAEP, WOCCISD is unable to determine why the student data show that certain students are referred to the program disproportionately or whether discipline is managed equitably.

Program evaluation provides actionable information regarding district programs, enables the district to monitor and adjust programs as they are implemented, and helps district and campus administrators make evidence-based decisions on which programs work for students and which do not. A 2011 study by the Council of State Governments Justice Center and The Public Policy Research Institute, Texas A&M University titled, "Breaking Schools' Rules: A Statewide Study of How School Discipline Relates to Students' Success and Juvenile Justice Involvement" found that 31.0 percent of students involved in the district's disciplinary system repeated a grade compared to only 5.0 percent of students with no disciplinary actions. Additionally, this study found that 10.0 percent of students with disciplinary actions dropped out of school compared to only 2.0 percent of students with no disciplinary actions. A 2009 report by the Intercultural Development Research Association

titled *Disciplinary Alternative Education Programs in Texas* recommended that DAEPs should:

- provide mechanisms to address and short-circuit minority, low-income and special education student over-representation in DAEP referrals, including early warning triggers at the school or district levels;

- subject DAEPs to the same accountability requirements applicable to regular school settings; and

- analyze DAEP performance and progress and make recommendations for improvement to the state legislature and governor annually.

The report encourages creating local procedures to monitor the DAEP in an effort to maintain equitable disciplinary practices and other improvements via annual performance evaluations. By regularly tracking data and evaluating their programs, districts can make decisions about the effectiveness of their programs and could save vital resources by performing ongoing evaluations.

WOCCISD's failure to regularly evaluate its programs could lead to physical safety risks, students not receiving adequate school services, inequitable disciplinary actions, and inefficient use of school resources that are dedicated to maintaining programs that may not be serving students and staff effectively.

WOCCISD should establish a process to monitor and evaluate the effectiveness of its DAEP.

The superintendent should collaborate with the director of student services to set annual and long-term goals for the district's DAEP and annually evaluate the program based on these goals. School districts' goal setting often is confined to academic goals; however, the U.S. Department of Education stated in its 2018 Setting Useful Goals document that improving the social environment of a school also can be addressed in goals. Several available resources help develop, track, and train for discipline goals. In 2019 the Regional Education Laboratory Northwest developed a training guide for using data to promote equity in school discipline to help schools find areas for improvement in their disciplinary data and track the progress of implemented interventions. This guide offers an agenda for the training and several handouts, one of which explicitly focuses on measuring the outcomes of implemented changes in a school's or district's disciplinary practices.

The director of student services also should track recidivism rates and students' academic progress before and after completing the DAEP placement and report these data to the superintendent during the annual evaluation of the program. The superintendent and the director of student services should use these data to inform their goal setting for the program each year.

The district could implement this recommendation with existing resources.

STAFFING STANDARDS (REC. 11)

WOCCISD has not established staffing standards for campus security or student services staff.

At the time of the review team's onsite visit, the district's police department staffed eight employees, including a chief of police, dispatcher, two police officers, and four campus safety officers. **Figure 5–1** shows the organization of the WOCCISD Police Department.

Although a police officer's duties may converge with those of a campus safety officer, a police officer is a sworn officer of the law with the ability to investigate criminal offenses that occur within the district, arrest perpetrators, and file charges. A campus safety officer's duties are more focused on student management and the security of facilities. A partial list of duties for each include helping to resolve conflicts between students, reporting disturbances to the administration, patrolling the campuses, and checking doors. A police officer

and campus safety officer are stationed all day at each school, except for North Early Learning Center, which has neither, and the high school, which has a police officer and two campus safety officers. North Early Learning Center is assigned an officer at the beginning and end of the school day to observe student drop-off and pickup. Staff reported to the review team that the safety officer often observes these activities from a vehicle. Although most staff reported being satisfied with security staffing at their campuses, some expressed concern about the lack of security staffing at the North Early Learning Center.

Staff at North Early Learning Center reported several safety incidents at the campus during the past few school years. Among those occurrences, staff mentioned an individual who stood suspiciously at the fence near the school's playground, gunshots fired in the nearby neighborhood that initiated a campus lockdown, and a house near the campus that was visited by district police due to safety concerns. Furthermore, most write-in responses to the safety questions in staff and parent surveys concerned shootings and the general safety of neighborhoods surrounding the schools. The survey responses did not specify campuses; however, during onsite interviews, many staff confirmed that several shootings occurred near North Early Learning Center. Staff also acknowledged that WOCCISD does not use staffing formulas or a formal safety assessment when determining the number of safety and security staff assigned to each campus. Staff reported that safety and security staffing is assigned based on what district leadership determines after an informal discussion with campus administration.

The National Association of School Resource Officers (NASRO) is a not-for-profit organization committed to helping schools keep students safe by providing school-centered safety training to officers. In a standards and best practices document published in 2018, NASRO recommends the placement of at least one school resource officer (SRO) on each campus. In addition, NASRO's Standards and Best Practices for School Resource Officer Programs states that districts should determine the number of SROs in each school based on, but not limited to, the following criteria:

- school enrollment;
- discipline history;
- number of campus buildings;
- campus acreage;
- calls for service;

FIGURE 5–7
WEST ORANGE-COVE CONSOLIDATED ISD RATIOS OF COUNSELORS AND NURSES TO STUDENTS COMPARED TO INDUSTRY STANDARD RATIOS
SCHOOL YEAR 2022–23

		COUNSELOR-TO-STUDENT RATIO			NURSE-TO-STUDENT RATIO	
CAMPUS	STUDENT POPULATION	WOCCISD COUNSELORS	ASCA 1:250	STATUTE 1:500	WOCCISD NURSES	TASB 1:750
North Early Learning Center	302.0	1.0	1.0	0.5	1.0	0.5
West Orange-Stark Elementary School	1,107.0	2.0	4.0	2.2	1.0	1.5
West Orange-Stark Middle School	518.0	1.0	2.0	N/A	1.0	1.0
West Orange-Stark High School	633.0	3.0	2.5	N/A	1.0	1.0

NOTES:
(1) The position of counselor includes those that provide mental health services to students and the high school Career and Technical Education counselor; it does not include Community in Schools counselors, who focus primarily on mental health, of which each campus has one.
(2) Statute refers to the Texas Education Code.
SOURCES: The Texas Education Code, Section 33.002; American School Counselor Association (ASCA); Texas Education Agency; Texas Association of School Boards (TASB); West Orange-Cove Consolidated ISD (WOCCISD), October 2022.

• location in the community; and

• number of safety staff who are not sworn officers in the building.

Additionally, beginning in September 2023, House Bill 3, Eighty-eighth Legislature, Regular Session, 2023, requires all school districts to station an armed security officer at each campus for the duration of the regular school day.

The district's Student Services Department does not use a staffing formula or industry standards to staff its department, specifically for school counselors and nurses. The director of student services and the assistant superintendent of student services oversee the staffing of counselors and nurses at each school. The number of each position assigned to a particular campus is based on the perception of administrators regarding the school's need. For example, the elementary school added a counselor for school year 2022–23 after having one counselor during the previous school year. The Texas Education Code, Section 33.002, requires elementary schools to staff 1.0 counselor position for every 500.0 students. The American School Counselor Association (ASCA) recommends a ratio of 1.0 counselor to 250.0 students. Additionally, TASB recommends 1.0 nurse to every 750.0 students in healthy populations. **Figure 5–7** shows the number of nurses and counselors at each WOCCISD campus for school year 2022–23 compared to best practice standards. The number of counselors does not include the CIS staff at each campus.

As shown in **Figure 5–7**, for school year 2022–23 the district assigned at least one counselor at each campus, and two of the campuses staffed more than one position. North Early Learning Center meets the ASCA staffing recommendations, as well as the high school, which exceeds both staffing recommendations. Both the elementary school and middle school employ fewer than ASCA's recommended 1.0 counselor for every 250.0 students.

The district employs three registered nurses and one licensed practical nurse, and each campus currently has one nurse on staff. North Early Learning Center, the middle school, and the high school meet TASB's recommended one to 750.0 student-to-nurse ratio; however, one nurse serves the elementary school's student population of 1,107.

The ratios recommended by TASB and ASCA are suggestions based on what each entity has determined is needed to meet students' needs adequately. No statutory requirements outline the ratio or number of counselors to students in a district except at elementary schools nor the ratio or number of nurses to students required in a district. In conjunction with a formal evaluation process and other feedback, these ratios act as a guide for helping districts make staffing decisions that best meet the needs of their student and staff populations.

Without consistent staffing standards, the district could have inadequate numbers of security staff at some campuses. A campus without an officer present during the school day might be required to wait for nearby officers

from the district or city to respond during an emergency. A campus lacking a nurse due to absence would have no staff available to respond to medical situations while the nurse is absent. And the limited number of counselors on staff at the district may struggle to fulfill all their duties and serve their students effectively.

The district should hire an additional campus safety officer to be stationed at North Early Learning Center and establish staffing standards for the WOCCISD Police Department and Student Services Department.

The deputy assistant superintendent of schools, who oversees the Human Resources Department, should collaborate with the chief of police and assistant superintendent of student services to establish staffing standards based on current industry standards and any other district variables pertinent to each position. NASRO, ASCA, TASB, TEA, and other organizations offer ratios and guidelines to help develop these staffing standards based on student population and other district data or considerations, including the number of campuses and buildings, the physical size of each campus, and the local community. Moreover, during the annual evaluation of both the counselor and nurse positions, feedback should be gathered from staff concerning the staffing levels and adequacy of these positions to fulfill their duties and meet the needs of their student population. The deputy assistant superintendent of schools should regularly reevaluate this standard in conjunction with changes in student enrollment, budget, and other factors.

The district should assign a safety officer to each campus, which currently would apply only to the North Early Learning Center pursuant to House Bill 3.

The fiscal impact assumes that the district hires an additional campus safety officer position during school year 2023–24. The position's salary should be developed by considering the range of the salaries of other WOCCISD campus safety officers. The estimated cost to establish this position would be $28,322 ($23,602 x 20.0 percent benefits rate), totaling $141,610 for the next five school years.

ADDITIONAL OBSERVATIONS

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

WRITTEN SAFETY PROCEDURES

The district produced a written copy of its visitor management procedures but could not provide any other written safety procedures. The review team determined that the duties of safety officers were included in their job descriptions but not provided in any manual or written procedures documents.

The district has not distributed a comprehensive safety and security procedures manual to all campuses and safety staff. The documenting of procedures is especially important at WOCCISD because the district has hired additional police and safety officers during the past few school years and has implemented new safety processes at each campus. Some of the safety procedures that are not documented for officers include patrolling their assigned campuses, responding to calls, controlling traffic and parking on campus, completing regular door checks, completing any associated reports, and attending regular meetings with other safety staff.

Without written procedures for the district's safety functions, the district is at risk of improper use of equipment, inconsistent performance of safety procedures and documentation, and potential liabilities for officers.

The district should develop a comprehensive safety and security procedures manual for distribution to all campuses and safety staff.

The chief of police should develop this procedures manual and submit it to the superintendent for approval. The manual should cover the following topics: metal detector use, proper radio communication, emergency training, safety and security audits, emergency preparedness drills, incident reporting, regular door checks, monitoring of students traveling between buildings to change classes, addressing doors that are propped open, developing the EOP, and any other safety procedures specific to the district. This manual also should incorporate existing visitor management procedures.

KEY AND ALARM CODE MANAGEMENT

WOCCISD has a limited key and alarm code management system.

Maintenance Department staff serve as the custodians of the keys for the district, and the department maintains a master list of keys and alarm codes. During interviews, staff reported that the district's electronic system for tracking keys recently was subject to a ransomware attack, which locked staff out of their key inventory system. Staff also reported during the onsite visit that the district was

rebuilding its inventory system as a consequence of that attack. In the meantime, the department uses a spreadsheet to document its keys and alarm codes.

Administration and custodians have master keys for the campuses they serve. On most campuses, the district assigns a unique alarm code to each individual, except at the middle school where staff use a single code to turn the alarms on and off. Staff across the district stated that, due to high turnover, they have limited the practice of issuing unique alarm codes to each staff member. New staff receive keys and an alarm code from the Maintenance Department and exiting staff are instructed to return their keys to the Maintenance Department. Other than the director of maintenance, no staff reported knowing exactly who has keys and alarm codes, and information provided by campus administrators and security staff on this topic was inconsistent. Additionally, the master list of keys and alarms is not readily accessible by administrators or security staff and must be requested from the Maintenance Department. The review team found no reported instances of previous staff maintaining keys or alarm codes after employment nor any situations in which unauthorized individuals were issued keys or codes. However, the lack of communication among staff about who has access to buildings and rooms could lead to confusion during an emergency and could place the district's physical security at risk. The district also could be vulnerable to attack by an individual in possession of untracked keys and alarm codes.

WOCCISD should update the key and alarm code management systems with written key inventory procedures.

Currently, the employee handbook for WOCCISD states that staff should return keys and other district property when employment with the district ends. The director of maintenance should develop a more robust key and alarm code policy that is approved by the superintendent and added to the WOCCISD employee manual. This policy also should outline the process for receiving and returning any keys issued and record any alarm codes used by that staff member so they can be disabled. The administrative assistant in the Maintenance Department should develop written procedures for assigning keys and alarm codes to new staff and for requesting keys from employees leaving the district. The administrative assistant also should develop written procedures for the Maintenance Department for inventorying the keys and current alarm codes assigned to district employees and submit them to the director of maintenance for approval. Additionally, the Maintenance Department should make the inventory list accessible electronically to all

campus administrators and safety staff so they are aware of who has access to the buildings within their supervision.

IMPROVING ACCESS TO THE ELEMENTARY SCHOOL AND ADDRESSING THE UNDEVELOPED LAND SURROUNDING IT

The district's elementary campus is surrounded by undeveloped and heavily wooded land that poses safety concerns. At the time of the review, the elementary school had a single road that provides access for vehicles entering and exiting the campus, which could hinder emergency personnel from effectively responding to emergency situations.

The campus is separated partially from densely wooded land by a chain-link fence, which does not surround the campus nor offer privacy. Additionally, during interviews, staff expressed concerns that land near the elementary school may not provide enough safe and accessible space to evacuate students during a fire or another emergency.

WOCCISD should collaborate with city and county officials to consider the cost of constructing an additional roadway to improve accessibility to the elementary school. The district also should consider the strategies used by Crime Prevention Through Environmental Design to address the undeveloped land adjacent to the campus. Factors include assessing how visible and accessible the campus and its occupants are, distinguishing public and private areas, and better managing the functional layout of the school. Although the district cannot address each of these issues, it can coordinate with the owners of the land behind the school to establish more privacy for the campus. For example, the school could cover the fencing with mesh material to block visibility of the campus or complete the fence so that it surrounds the entire school.

COUNSELORS

During interviews, staff reported that counselors at WOCCISD do not have adequate time to provide required emotional counseling services for students. Staff noted that, depending on the campus, counselors also complete the following tasks:

- organizing student and staff schedules;

- checking grade inputs to complete reports;

- scheduling plans for the referral of and accommodations for students served by special education;

- serving as the campus's testing coordinators or assisting with administration of standardized tests;

- serving as the campus's data coordinator or entering data for TEA's Public Education Information Management System; and

- supporting other academic needs.

School counselors are assigned specific statutory duties. Pursuant to the Texas Education Code, Section 33.005, counselors are required to develop a program that includes the following components:

- a guidance curriculum to help students develop their full educational potential, including the student's interests and career objectives;

- a responsive services component to intervene on behalf of any student whose immediate personal concerns or problems put the student's continued educational, career, personal, or social development at risk;

- an individual planning system to guide a student as the student plans, monitors, and manages the student's educational, career, personal, and social development; and

- systems to support the efforts of teachers, staff, parents, and other community stakeholders in promoting the educational, career, personal, and social development of students.

Furthermore, the Texas Education Code, Section 33.006(d) states that school counselors must commit at least 80.0 percent of their time to duties that are components of the counseling program or the school board must adopt a policy to invoke an exception to this rule based on district staffing. At the time of the review, the district's board had not adopted any such policy and WOCCISD staff indicated during interviews that counselors are not meeting this 80.0 percent rule because of other demands on their time.

With assistance from the campus administrators, the director of student services should assess the duties counselors are performing and either suggest to the board that they adopt a policy exempting counselors from the 80.0 percent rule or consider reassigning some academic roles, such as inputting grades and testing coordination, to other staff in the district. If the board does not adopt

a policy exempting counselors from the 80.0 percent rule, the director of student services also should establish specific goals for counselors that include meeting the 80.0 percent requirement. These goals should be provided to the campus administrators to inform the counselors on their campuses and be added as a part of their annual evaluations of the counselors.

DISTRIBUTION OF STUDENT SERVICES

Staff reported that the district seeks to hire a new student services position specifically tasked with referring and connecting students with available district resources; however, this position had not been developed or posted at the time of the onsite visit.

The district offers several partnership service programs. Texas Child Health Access Through Telemedicine (TCHATT) provides telehealth services for students. Houston Circle of Hope provides behavioral health services. Spindletop offers healthcare services for students and their families. Communities in Schools offers a range of resources to students from counseling to removing socioeconomic barriers that may hinder a student from attending school. Staff reported that they believe many of these programs provide excellent resources for students in need; however, they also reported difficulties in identifying the resources each program has available and directing students to the appropriate services.

These programs are effective to the extent to which they are utilized, which staff reported was hard to assess because the district does not evaluate the use of these services. Staff reported that they track the number of referrals submitted for each program, but the evaluation of the effectiveness of these programs otherwise is limited.

The director of student services should collaborate with counselors, nurses, and campus administrators to develop and implement a streamlined process to inform staff of the various programs the district utilizes and the resources each provides. Additionally, the process should provide clear instructions to staff on how to refer students to these programs. The district also should develop and implement an evaluation process for each program. This evaluation could be an annual survey to assess the satisfaction of district and campus staff, students, and their families who access the programs. These measures would assist WOCCISD to determine which programs are functioning best to meet students' needs.

FISCAL IMPACT

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

should review them to determine the level of priority, appropriate timeline, and method of implementation.

The review team identified a fiscal impact for one of the recommendations in this chapter. If the district hires another safety officer in accordance with **Recommendation 11**, it will incur the following costs.

RECOMMENDATION	2023–24	2024–25	2025–26	2026–27	2027–28	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
SAFETY AND SECURITY MANAGEMENT							
11. The district should hire an additional campus safety officer to be stationed at North Early Learning Center and establish staffing standards for the WOCCISD Police Department and Student Services Department.	($28,322)	($28,322)	($28,322)	($28,322)	($28,322)	($141,610)	$0
Total	**($28,322)**	**($28,322)**	**($28,322)**	**($28,322)**	**($28,322)**	**($141,610)**	**$0**

6. TRANSPORTATION MANAGEMENT

FINDINGS

♦ West Orange-Cove Consolidated Independent School District's (WOCCISD) Transportation Department lacks performance metrics to guide management and assess the effectiveness and efficiency of its transportation function.

♦ WOCCISD lacks a comprehensive, board-adopted, vehicle replacement plan.

♦ WOCCISD has not implemented features of its routing software to optimize the district's bus routes.

♦ WOCCISD has insufficient vehicle maintenance staffing for its fleet size and lacks a plan to recruit qualified candidates.

RECOMMENDATIONS

♦ **Recommendation 12: Develop performance metrics to measure the effectiveness and efficiency of the Transportation Department.**

♦ **Recommendation 13: Develop a policy to guide replacement and disposal of buses and white fleet vehicles based on each vehicle's mileage and age.**

♦ **Recommendation 14: Evaluate bus routes and schedules, fully implement the district's transportation software, and schedule periodic reviews and updates.**

♦ **Recommendation 15: Develop and implement a plan for recruiting qualified mechanics.**

BACKGROUND

An independent school district's transportation function transports students to and from school and other school-related activities. This function is regulated by federal and 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 either may contract for or self-manage their transportation operations. Using a contracted management model, districts rely on the company to provide supervision of its transportation operation. In this arrangement, a district may rely on the company to provide all or

FIGURE 6–1
WEST ORANGE-COVE CONSOLIDATED ISD'S TRANSPORTATION DEPARTMENT ORGANIZATION SCHOOL YEAR 2022–23
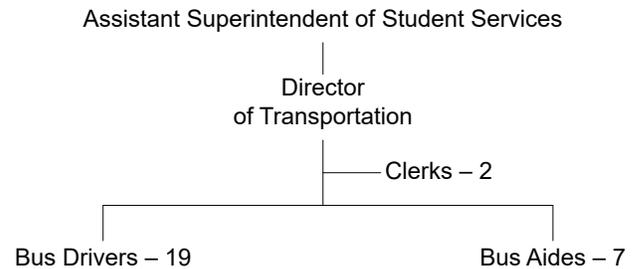
Sources: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

some staff, or it may use district staff for its operations. Using the self-management model, a district manages transportation functions without assistance from an outside entity.

Managing transportation operations requires planning; state reporting and funding; training and safety; and vehicle maintenance and procurement. Primary transportation expenditures include capital investments in vehicle fleets, and annual costs of maintenance and operations. State transportation funding relies on a district's annual submission of certain transportation reports to the Texas Education Agency (TEA), and funding is determined by a formula that includes the number and type of students transported.

West Orange-Cove Consolidated Independent School District (WOCCISD) self-manages its transportation operations. The Transportation Department maps and serves the bus routes that transport students to and from school. It also coordinates transportation for athletics and extracurricular trips.

The district maintains a fleet of 32 school buses that serve 14 bus routes, which include 13 regular program routes and one special program route. During school year 2021–22, the district reported transporting an average of 1,633 students daily out of 2,555 enrolled, or 63.9 percent.

The director of transportation oversees the Transportation Department and reports to the assistant superintendent of student services. **Figure 6–1** shows the organization of WOCCISD's Transportation Department in school year 2022–23.

FIGURE 6–2
WEST ORANGE-COVE CONSOLIDATED ISD'S TRANSPORTATION ROUTING AND STATE FUNDING DATA
SCHOOL YEARS 2019–20 TO 2021–22

CATEGORY	2019–20	2020–21	2021–22
Average daily ridership – Regular program/Hazardous area service	1,590	1,229	1,594
Average daily ridership – Special program	40	23	39
Average daily ridership – Total students	1,630	1,252	1,633
Linear density (number of regular program students transported 2.0 miles or more)	1.11	1.78	1.20
WOCCISD's total annual state transportation funding	**$77,453**	**$95,208**	**$103,475**

SOURCE: Texas Education Agency, West Orange-Cove Consolidated ISD School Transportation Route Services Report, school years 2019–20 to 2021–22.

The department staff includes 19 bus drivers, seven bus aides, and two clerks. Bus aides assist on the special program route, and the clerks assist with clerical and administrative duties in the department. All transportation staff work at the West Orange Transportation building. The district has been unable to hire any substitute drivers when the regular route drivers are unavailable, which requires the director of transportation to serve as a substitute driver on occasion.

The district completed construction of a new transportation facility at West Orange-Stark High School in May 2023, where all buses and white fleet vehicles will be stored. The current West Orange Transportation building has a fuel point that dispenses diesel fuel and unleaded gasoline.

Figure 6–2 shows the district's student ridership during the past three school years. The average daily ridership has remained consistent during this period. From school years 2019–20 to 2021–22, average daily ridership for the regular program increased by four students and decreased for the special program by one student. The decrease in ridership from school years 2019–20 to 2020–21 is a result of students receiving virtual instruction during the onset of the COVID-19 pandemic.

As shown in **Figure 6–2,** WOCCISD's linear density of its transportation services increased from school years 2019–20 to 2021–22. Linear density is the ratio of the average number of regular education students transported daily to the number of miles traveled daily for those students. Linear density increased from school years 2019–20 to 2021–22 as the total annual mileage for service of at least 2.0 miles for the regular program routes increased from 70,412 miles to 94,068 miles, an additional 23,656 miles.

Total annual state transportation funding for the district increased by $26,022 from school years 2019–20 to 2021–22.

DETAILED FINDINGS

PERFORMANCE METRICS (REC. 12)

WOCCISD's Transportation Department lacks performance metrics to guide management and assess the effectiveness and efficiency of its transportation function.

The Transportation Department is responsible for transporting students from home to school and back. The drivers and aides conduct pre-trip inspections before departing for the morning bus run.

Principals and coaches reported that the Transportation Department coordinates daily student transportation effectively at the campuses and for afterschool student activities. However, the director of transportation said that the department does not track any performance metrics systematically to assess the overall efficiency of its transportation services. The district does not compare its performance to established benchmarks, key performance indicators (KPI), or practices in peer districts to identify areas for improvement. KPIs track progress toward achieving the organization's objectives by monitoring activities that could promote, prevent, or hinder attainment of those objectives.

Figure 6–3 shows WOCCISD's transportation expenditures. Since school year 2019–20, the total cost of transportation has increased by 21.3 percent, but the increase has not been uniform among the categories. Salaries and benefits have increased by 14.8 percent, purchases have decreased by 45.4 percent, and expenditures for supplies and materials have increased by 106.5 percent. The large increase in supplies and materials relates to the construction of the district's new transportation facility that became operational in May 2023. During the same period, the cost per mile of the regular transportation program increased by 2.5 percent, and the

FIGURE 6–3
WEST ORANGE-COVE CONSOLIDATED ISD TRANSPORTATION DEPARTMENT EXPENDITURES
SCHOOL YEARS 2019–20 TO 2021–22

KEY MEASURES	2019–20	2020–21	2021–22	PERCENTAGE CHANGE
Total costs	$1,077,599	$1,091,412	$1,307,557	21.3%
Salaries and benefits	$757,362	$831,026	$869,685	14.8%
Purchases	$114,207	$54,724	$62,413	(45.4%)
Supplies and materials	$145,728	$139,398	$300,916	106.5%
Depreciation/other operating expenses	$60,302	$66,264	$75,543	25.3%
Cost per mile, regular program	$6.74	$6.64	$6.91	2.5%
Cost per mile, special program	$6.74	$5.92	$4.63	(31.3%)

SOURCE: Texas Education Agency, Student Transportation Operation reports, school years 2019–20 to 2021–22.

FIGURE 6–4
COMPARISONS OF WEST ORANGE-COVE CONSOLIDATED ISD'S AND PEER DISTRICTS' OPERATIONS
SCHOOL YEAR 2021–22

DISTRICT	OPERATIONS COST	BUSES	RIDERS	COST PER REGULAR PROGRAM MILE	COST PER SPECIAL PROGRAM MILE
West Orange-Cove Consolidated ISD	**$1,307,556**	**32**	**1,633**	**$6.91**	**$4.63**
Bellville ISD	$1,410,771	35	724	$3.69	$3.27
Coldspring-Oakhurst Consolidated ISD	$1,389,044	36	978	$3.31	$2.64
Sweeny ISD	$685,782	25	489	$3.83	$1.16

SOURCE: Texas Education Agency, Transportation Operation Report and Route Services Report, school year 2021–22.

cost per mile for the special program decreased by 31.3 percent. Without regularly assessing or tracking these expenditures and student data, the department may be unable to identify operational inefficiencies or areas for potential savings quickly.

A key indicator of a transportation operation's efficiency is a comparison of the operation's fleet and costs to those of similarly sized operations. **Figure 6–4** shows the operations cost, number of buses, ridership, and cost per regular program and special program per mile for WOCCISD and its peer districts during school year 2021–22. Peer districts are school districts similar in size and other characteristics to WOCCISD that are used for comparison purposes. The peer districts for WOCCISD are Bellville ISD, Coldspring-Oakhurst Consolidated ISD, and Sweeny ISD. For school year 2021–22, WOCCISD had higher operations costs than one peer district and higher regular program mile costs and special program mile costs than all three of the peer districts.

WOCCISD's percentage change increase in the cost-per-mile ratios in **Figure 6–3** and the high cost-per-mile totals compared to peers shown in **Figure 6–4** are attributed

primarily to the greater number of route-related miles driven at WOCCISD relative to peer districts and the number of students each district serves. However, without a process to track performance metrics, the district is not equipped to identify inefficient operations and opportunities to lower costs.

Effective districts use performance measurement systems to identify measurable goals and objectives. Districts establish a desired goal or benchmark for each measurement, document its data, and compare the data to the benchmarks.

The process of continuous improvement requires the use of benchmarks. Establishing performance metrics for transportation operations assists a district to make data-driven decisions supported by objective evidence. Districts can use this information to determine how the department is functioning monthly or quarterly.

Figure 6–5 shows an example of transportation benchmarks used in other districts or noted in transportation research.

WOCCISD should develop performance metrics to measure the effectiveness and efficiency of its Transportation Department.

FIGURE 6–5
TRANSPORTATION INDUSTRY BENCHMARKS

BENCHMARK	MEASURE
Preventable accidents	1 per 100,000 miles
On-time performance	99.5% (includes all services)
Routing utilization efficiency	80.0% of available time or available capacity
Runs per bus (pickup routes)	Ranges from 1.6 to 1.9 (double-tiered system); ranges from 2.3 to 2.5 (triple-tiered system)
Bus-to-mechanic ratio	Ranges from 25:1 to 30:1 (depends on fleet type and age)
Spare bus ratio	10.0% to 15.0% (depends on fleet composition and trip volume)
Driver turnover rate	Less than 15.0%
Parts cost per mile (no labor)	Ranges from $0.16 to $0.18 (depends on fleet type and age)
Maintenance cost per mile	Ranges from $0.39 to $0.43 (depends on fleet type and age, assumes 13,000 miles per bus per year)
Fleet miles per gallon	Ranges from 6.0 to 7.0 (depends on fleet composition, type, age)
Driver labor as percentage of operating costs	Ranges from 39.0% to 43.0% (excluding benefits and workers' compensation)
Total labor as percentage of operating costs	Ranges from 54.0% to 61.0% (excluding benefits and workers' compensation)
Insurance and risk as percentage of cost	Ranges from 5.0% to 10.0% (excluding workers' compensation)
Annual cost per bus operated	Ranges from $30,000 to $50,000 per bus (no capital cost)
Fleet useful life	Ranges from 10,000 miles to 15,000 miles per year – 180,000 miles maximum
Bus replacement policy	Ranges from 10 years to 12 years (11 years to 13 years for spares)

SOURCES: Legislative Budget Board School Performance Review Team, October 2022; Council of the Great City Schools, 2010; American School and University magazine, 2005; National Association of State Directors of Pupil Transportation Services, 2010.

The director of transportation should identify goals with clear objectives and dates to accomplish critical tasks. The director should develop the initial set of performance metrics and communicate them to all stakeholders.

Figure 6–6 shows critical areas the district should consider when developing a tracking system for performance metrics.

The director of transportation should compare actual performance to the selected benchmarks to identify areas for improvement. The director regularly should report performance information, including goals and areas for improvement, to the assistant superintendent of student services and the superintendent.

The district could implement this recommendation with existing resources.

BUS REPLACEMENT PLAN (REC. 13)

WOCCISD lacks a comprehensive, board-adopted, vehicle replacement plan.

The district owns 32 buses in its fleet. The district also owns 32 white-fleet vehicles consisting primarily of trucks, vans,

FIGURE 6–6
CRITICAL TRANSPORTATION MEASUREMENTS FOR WEST ORANGE-COVE CONSOLIDATED ISD OCTOBER 2022

BENCHMARK	MEASURE
Cost efficiency	Cost per mile; cost per student; cost per bus
Cost effectiveness	On-time performance; spare bus ratio; driver absentee rate; average student occupancy rate
Safety	Accidents per 100,000 miles; student behavior incidents per month

SOURCE: Legislative Budget Board School Performance Review Team, October 2022.

and sport utility vehicles. From school years 2018–19 to 2021–22, the district has purchased two new school buses. According to the director of transportation, the district budgets for school bus and white-fleet vehicle replacement through its budgeting process that projects the district's budget during one-year, three-year, and five-year periods. However, the district lacks a formal, board-adopted, fleet

replacement plan and has not established long-term funding methods for future bus purchases.

Figure 6–7 shows the district's school bus inventory and the year each vehicle was purchased.

The district's bus purchasing has been inconsistent as 28 of the district's 32 buses were purchased in 2010. The district makes ad hoc decisions to replace buses and without the benefit of industry replacement criteria commonly used as a best practice in self-managed transportation departments. The fleet has an average age of 12.2 years, ranging in age from 2.0 years to 30.0 years, and 30 of its buses are more than 10 years old.

The district used 14 buses in daily routes for school year 2021–22. According to staff, the director of transportation and bus drivers regularly assess the condition of buses and schedule repairs and ongoing maintenance as necessary. By performing regular maintenance, the Transportation Department has kept all its buses operational. However, older buses eventually will require service levels and increased costs that become prohibitive to maintain.

Staff reported that a detailed bus replacement plan has been developed and presented to the district administration for consideration, however no action has been taken to implement the proposal.

The National Association of State Directors of Pupil Transportation Services recommends that school districts replace their buses at intervals ranging from eight years to 15 years, depending upon the type of bus and amount of use. Buses older than 16 years often are not compliant with current regulations and policies. An aging fleet with significant mileage typically requires a higher cost of operation due to lower fuel efficiency, the need for more frequent repairs, and higher repair costs. Using this standard, 30 of WOCCISD's 32 buses are at least 12 years old and within the age range of recommended replacement.

The average age of the district's white-fleet vehicles is 6.9 years, and many need replacement. **Figure 6–8** shows the model year, age, and type of each vehicle in the district's white-fleet inventory.

Without a defined and supported replacement plan, the average and maximum ages of a district's fleet of vehicles likely will increase. Although interviews with principals and staff indicate a high level of satisfaction with the service provided by the Transportation Department, maintaining an acceptable level of service will become increasingly difficult

FIGURE 6–7
WEST ORANGE-COVE CONSOLIDATED ISD'S BUS INVENTORY BY MODEL YEAR, SCHOOL YEAR 2021–22

MODEL YEAR	BUS AGE (IN YEARS)	MAKE	QUANTITY
2020	2	Chevrolet	2
2010	12	International	28
2003	19	Thomas	1
1992	30	International	1
Total			**32**

SOURCES: Legislative Budget Board School Performance Review Team, West Orange-Cove Consolidated ISD, October 2022.

FIGURE 6–8
WEST ORANGE-COVE CONSOLIDATED ISD WHITE FLEET INVENTORY BY MODEL YEAR SCHOOL YEAR 2021–22

MODEL YEAR	VEHICLE AGE (IN YEARS)	MAKE	MODEL	QUANTITY
2022	0	Chevrolet	Blazer	1
			Traverse	1
2021	1	Chevrolet	2500 HD	1
			Suburban	1
		Ford	1500 Truck	1
			F-350 Truck	1
2020	2	Toyota	Sedan	1
2019	3	Chevrolet	Express Van	1
		Ford	F-150 Truck	1
			Explorer	1
2018	4	Chevrolet	Malibu	1
		Ford	F-150 Truck	4
			F-250 Truck	2
2017	5	Ford	Expedition	1
			F-150 Truck	1
			E-150 Van	1
		GMC	Acadia	1
2014	8	Ford	Expedition	1
			F-250 Truck	1
2010	12	Ford	E-150 Van	2
			E-150 Dually	1
2008	14	Ford	F-250 Truck	2
2004	18	Chevrolet	2500 Truck	1
		Ford	Excursion	2
1999	23	Chevrolet	Suburban	1
Total				**32**

SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

and more expensive for the district due to higher maintenance costs for older buses.

Regular investment in bus fleet replacement is important to promote the ongoing safety, reliability, and efficiency of the district's transportation services. Older vehicles are more likely to break down and require service, which often makes them unavailable for duty and requires the Transportation Department to retain a higher proportion of spare vehicles in the fleet. Older vehicles are not equipped with the latest technological improvements for safety and efficiency.

Additionally, during school year 2021–22, the Transportation Department maintained more than twice as many buses as the number of daily routes in the district. According to the director of transportation, the department uses spare buses as back-up vehicles and as student transportation for extracurricular activities. Carrying many surplus buses in inventory typically results in increased costs to the district in the form of registration, insurance, and ongoing maintenance.

According to the Council of the Great City Schools, a well-run transportation department should aim to procure only the number of buses needed daily, plus an appropriate spare bus ratio ranging from 10.0 percent to 15.0 percent. This standard is adaptable based on the fleet needs of a particular system, and factors that may affect the spare ratio include district size, off-site parking, age of the fleet, and reliability of the fleet.

WOCCISD's Transportation Department should develop a policy to guide replacement and disposal of buses and white fleet vehicles based on each vehicle's mileage and age.

One method for assessing optimal replacement criteria considers vehicle life cycle costs as a function of increasing maintenance costs and decreasing capital and depreciation costs, or annual change in residual value and accumulated maintenance costs. The point at which annual maintenance costs exceed the cost of ownership (annual capital and depreciation costs) represents the recommended replacement age. Continued maintenance and use of fleet vehicles and equipment past this optimal point increases cumulative life cycle costs.

In developing the vehicle replacement plan, the director of transportation should include key data, such as long-range enrollment forecasting and percentage of enrolled students transported. The plan should separate replacement criteria based on vehicle capacity and body type into different models and include the following data:

- vehicle mileage;

- maintenance costs compared to vehicle value;

- per-mile operating cost;

- anticipated annual cost increases of new vehicles;

- per-seat cost for school buses;

- anticipated revenue from the sale of replaced vehicles; and

- anticipated maintenance savings by removing older vehicles that are more expensive to maintain, including revenue from potential funding sources such as capital funds and bonds.

The replacement plan should be data-driven and based on objective criteria such as the age and mileage of the vehicle, and the parts necessary to maintain its serviceability, or a combination of criteria. The final plan should be submitted to the superintendent for approval.

Additionally, the director of transportation should remove any bus that meets the criteria for replacement from consideration for additional maintenance. As additional replacement vehicles are added to the fleet, the director of transportation regularly should identify older vehicles for surplus via auction or scrap.

According to staff, a bus replacement plan has previously been developed and submitted to district administration. However, no action has been taken and the plan has not been submitted to the board for consideration.

The district could implement this recommendation with existing resources.

ROUTE OPTIMIZATION (REC. 14)

WOCCISD has not implemented features of its routing software to optimize the district's bus routes.

Route planning and management are fundamental elements of an effective and efficient transportation operation. WOCCISD does not have a process to conduct thorough route planning and evaluation periodically, which may result in less efficient service for students. The district's annual route planning process consists mainly of entering data for new students, changing students' addresses, and removing students that no longer require transportation services. Route lists consist of handwritten "turn-by-turn" mileage logs that TEA requires for completion of the district's annual Transportation Route

Services Report. WOCCISD's route lists contain the necessary turn and stop locations; however, they do not provide regular or substitute drivers with a list of student passengers.

Without a periodic evaluation of typical routing performance measures, it is likely that ineffective route paths and disparate levels of service exist. These measures include student ride times and capacity utilization, which is the effectiveness of the planning process based on the available seating.

Although the district's transportation software package contains route optimization features, the Transportation Department does not utilize this resource to evaluate the efficiency of routes, optimize routes, or plan route changes for the upcoming school year.

Without a periodic review of bus routes and the ability to overlay route paths onto roadway maps, it is difficult for the district to determine opportunities for improvements in the routing network. The lack of a regular review and optimization process for routing and scheduling also hinders the district from evaluating whether it is providing the safest, most effective transportation services to students and optimizing the use of district funds.

Many districts use an electronic system to develop efficient bus routes. However, others use online mapping applications and common productivity programs for producing spreadsheets and documents to improve run paths and reduce manual processes.

National School Transportation Specifications and Procedures, adopted by the National Congress on School Transportation in 2015, is a useful resource for the route planning process. Its recommendations include the following elements:

- determining planning policies or guidelines, including eligibility and walk distances;

- developing routing strategies to increase efficiency or improve service levels, including feeder or transfer routes; and

- conducting periodic evaluations of route data to align route plans with the district's specific goals or parameters.

WOCCISD should evaluate bus routes and schedules, fully implement the district's transportation software, and schedule periodic reviews and updates.

The district should begin by utilizing all the features of its current routing software. This step includes performing

data cleanup, properly coding student information and route characteristics, training staff to use the software, and planning the most efficient bus routes. The district should upload relevant route and rider characteristics to the transportation software program to further enable analysis and mapping of efficient routes. The director of transportation should develop a schedule for recurring evaluations of the routes and schedules.

The superintendent, chief financial officer, and director of transportation should develop a policy and procedures to establish district guidelines for maximum student ride times. The superintendent also should submit the policy to the board of trustees for approval.

The district could implement this recommendation with existing resources.

VEHICLE MAINTENANCE STAFFING (REC. 15)

WOCCISD has insufficient vehicle maintenance staffing for its fleet size and lacks a plan to recruit qualified candidates.

During the past school year, the Transportation Department's only mechanic left the district, and the district had not filled the vacancy at the time of the review team's onsite visit. Although the district has posted job openings on its website for a mechanic and a lead mechanic, staff report that competition from the petroleum industry has resulted in a shortage of skilled vehicle technicians in the West Orange area.

As shown in **Figures 6–7** and **6–8**, much of the district's bus and white fleet consists of older vehicles, which increases the need for maintenance. The district's lack of skilled mechanical labor could result in the following consequences:

- the need to outsource maintenance support likely would be more expensive than hiring additional staff;

- a fleet with excessive downtime due to lack of preventive maintenance or ineffective repair could interfere with academic and extracurricular programming; and

- securing additional spare buses to compensate for excessive downtime and the lack of mechanics would result in additional expenses for insurance, inspections, and preventive maintenance.

Adequate mechanical support is critical to the functionality of a school district fleet operations. The district's ability to transport students safely, on time, and in a manner that

meets the community's expectations is impaired without a sufficient staff of experienced fleet mechanics. Industry benchmarks specify a ratio of one qualified technician for every 25 to 30 fleet vehicles. The variance in the range is affected by the age of the fleet, operating environment, number of spare vehicles, availability of spare parts, physical capacity of the repair shop, and other factors.

Based on current conditions, a ratio for WOCCISD of 25 vehicles per mechanic would be optimal. The district would need to hire two experienced fleet mechanics and one part-time assistant to achieve this ratio.

Currently, the district does not have a recruitment plan for attracting qualified mechanics to the district. The district's recruitment strategy consists of posting the openings for mechanic positions on its website and other job posting websites, and recruiting through talking to people in the community.

The Texas Association for Pupil Transportation (TAPT) is an organization of school transportation professionals that promotes transportation safety and efficiency by exchanging ideas among public school districts' transportation departments. TAPT sponsors an extensive curriculum, including training and certifications in many aspects of school transportation, through regional chapters and at annual state conferences. TAPT typically conducts training during the summer or on weekends. Its training program, which ranges from three years to four years, has helped several school districts to train school bus mechanics. In addition, candidates can achieve certifications during TAPT's regional conferences. Most districts pay for transportation to the training, lodging, meals, and tuition, and the candidate donates the time as professional development.

WOCCISD should develop and implement a plan for recruiting qualified mechanics.

To implement this recommendation, the district should address its immediate need to fill two mechanic positions as soon as possible. However, local competition for skilled mechanics requires the district to develop a network from which to recruit mechanics to meet future needs. To accomplish both tasks, WOCCISD should do the following:

- expand the reach of its job postings for mechanics by posting on the website of the Texas Association for School Bus Technicians and similar organizations, and attending job fairs at local community and

technical colleges that offer mechanical and engine certification programs;

- coordinate with local technical colleges such as Lamar Technical Institute in Beaumont to reach students receiving advanced engine certifications; consider sending information for instructors to relay to students, placing students or new graduates in intern or apprentice positions, or identifying opportunities for the transportation director to speak directly to students in these programs;

- consider providing financial assistance to graduating students enrolled in the district automotive Career and Technical Education classes to obtain mechanic or engine certifications. The district could condition this assistance on the understanding that certified graduates would work for the district for a certain period;

- enroll in the training opportunities offered by TAPT; the district could identify current district staff or others in the community who may be interested in obtaining mechanic or engine certifications through TAPT and offer financial assistance to promising candidates who agree to work for the district after earning certification.

The district could implement this recommendation with existing resources.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

7. HUMAN RESOURCES MANAGEMENT

FINDINGS

♦ West Orange-Cove Consolidated Independent School District's (WOCCISD) Human Resources Department does not have formal written procedures for human resources functions.

♦ WOCCISD does not track staff turnover effectively.

RECOMMENDATIONS

♦ **Recommendation 16: Develop a standard operating procedures manual for all human resources roles and responsibilities.**

♦ **Recommendation 17: Develop a comprehensive turnover tracking process that uses survey data to determine staffing retention opportunities.**

BACKGROUND

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

West Orange-Cove Consolidated Independent School District's (WOCCISD) HR Department consists of five staff: the deputy superintendent of schools, an executive administrative assistant, benefits administrator, HR clerk, and COVID-19 compliance monitor. The deputy superintendent of schools primarily manages the HR Department but also has responsibilities overseeing technology in the district. **Figure 7–1** shows the organization of the HR Department.

The deputy superintendent of schools' responsibilities include updating district policies and job descriptions, tracking staff evaluations, overseeing the grievance process, and staff recruitment. The executive administrative assistant is responsible for records management and performing reference and background checks for new applicants for all permanent positions. The HR clerk performs the executive administrative assistant's duties for substitute staff. The COVID-19 compliance monitor is responsible for tracking the district's COVID-19 cases and reporting them to the state health department and assists the deputy superintendent of schools with staff recruitment and the grievance process. The benefits administrator manages employee benefits and workers' compensation claims. The benefits administrator also assists the Finance Department to input data for new staff into its information management system and maintain accurate staff information, including the employee's salary. Several staff review the data for accuracy, including the deputy superintendent of schools, the payroll clerk, and the chief financial officer (CFO).

FIGURE 7–1
WEST ORANGE-COVE CONSOLIDATED ISD HUMAN RESOURCES DEPARTMENT
SCHOOL YEAR 2022–23
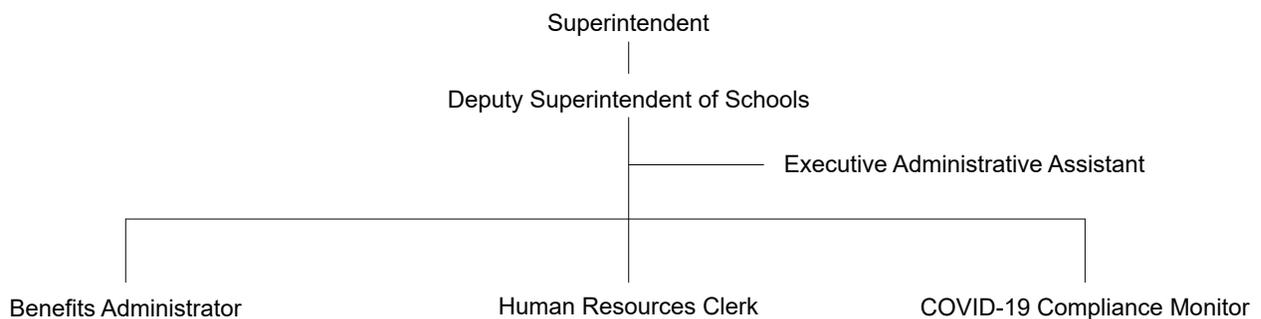
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

FIGURE 7–2
WEST ORANGE-COVE CONSOLIDATED ISD (WOCCISD) AND PEER DISTRICTS' BUDGETED PAYROLL EXPENDITURES FOR ALL FUNDS, SCHOOL YEAR 2021–22

CATEGORY	WOCCISD	BELLVILLE ISD	COLDSPRING-OAKHURST CISD	SWEENY ISD	PEER DISTRICT AVERAGE
Payroll expenditures	**$20,287,648**	$18,990,427	$15,435,237	$19,003,247	$17,809,637
Total expenditures	**$35,230,054**	$25,962,087	$21,185,734	$29,756,963	$25,634,928
Payroll as a percentage of total expenditures	**57.6%**	73.1%	72.9%	63.9%	69.5%

SOURCE: Texas Education Agency, Public Education Information Management System, Budgeted Financial Data, school year 2021–22.

FIGURE 7–3
WEST ORANGE-COVE CONSOLIDATED ISD AND PEER DISTRICTS' HUMAN RESOURCES (HR) DEPARTMENT STAFFING SCHOOL YEAR 2021–22

DISTRICT	HR DEDICATED STAFF	TOTAL STAFF	HR STAFF PER 100 STAFF	TOTAL STUDENTS	HR STAFF PER 100 STUDENTS
Bellville ISD	0	337.6	0.0	2,191	0.0
Coldspring-Oakhurst Consolidated ISD	1	281.4	0.4	1,586	0.1
Sweeny ISD	4	301.4	1.3	1,851	0.2
West Orange-Cove CISD	**5**	**407.4**	**1.2**	**2,555**	**0.2**

SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD (CISD); Bellville ISD; Coldspring-Oakhurst Consolidated ISD; Sweeny ISD, October 2022; Texas Education Agency, Texas Academic Performance Reports, school year 2021–22.

The HR Department also coordinates with the Finance Department, superintendent, department heads, and campus principals annually to determine staffing levels, which are based on enrollment, student needs, and available funding. Compared to its peer districts, WOCCISD has the lowest percentage of total expenditures from all funds dedicated to payroll expenditures. Peer districts are districts similar in size and other characteristics to WOCCISD that are used for comparison purposes and include Bellville ISD, Coldspring-Oakhurst Consolidated ISD, and Sweeny ISD. **Figure 7–2** shows WOCCISD's payroll expenditures compared to its peer districts.

The Legislative Budget Board's (LBB) School Performance Review Team visited the district in October 2022. During interviews, HR staff reported that the department is well-staffed and has a low turnover rate. **Figure 7–3** shows HR Department staffing data for WOCCISD and its peer districts. Compared to its peers, WOCCISD's HR Department has the most full-time employees, one of the highest ratios of HR employees per 100 students, and the second-highest ratio of HR employees per 100 district employees.

From school years 2017–18 to 2021–22, WOCCISD's enrollment increased by 151 students, or 6.3 percent. During that period, district staffing levels also increased by 21.6 full-time-equivalent positions, or 5.6 percent. **Figure 7–4** shows WOCCISD's staffing level changes from school years 2017–18 to 2021–22. Among the staffing groups, teaching staff increased the most during this period.

Although the district's number of total teaching staff has increased overall, WOCCISD maintains a high teacher turnover rate. **Figure 7–5** shows that WOCCISD's teacher turnover rate is higher than those of neighboring districts, which are used for comparison because WOCCISD is most likely to compete with these districts in the same region for job candidates. At 30.9 percent, WOCCISD's teacher turnover rate also was higher than the state average of 17.7 percent for school year 2021–22.

Staff reported that teacher pay is comparable to that of nearby districts. The deputy superintendent of schools annually reviews pay scales published by the Texas Association of School Boards (TASB) and neighboring districts to determine whether compensation and stipends amounts in WOCCISD's pay scale are competitive. The superintendent said the deputy superintendent of schools and the CFO also perform a market analysis. **Figure 7–6** shows WOCCISD's teacher pay scale compared to neighboring districts.

WOCCISD consistently pays teachers more at all levels of experience than three regional districts. WOCCISD offers the same starting pay as two regional districts, Beaumont

FIGURE 7–4
WEST ORANGE-COVE CONSOLIDATED ISD'S STAFFING LEVELS EXPRESSED AS FULL-TIME-EQUIVALENT POSITIONS
SCHOOL YEARS 2017–18 TO 2021–22

POSITION	2017–18	2018–19	2019–20	2020–21	2021–22	PERCENTAGE CHANGE
Total teaching staff	156.2	170.9	170.6	179.7	172.8	10.6%
Total educational aides	52.4	49.8	55.9	55.0	56.0	6.9%
Total administrative staff	21.9	22.0	19.0	20.0	22.0	0.5%
Total professional support staff	43.2	46.9	33.5	33.3	33.2	(23.1%)
Total auxiliary staff	112.1	115.1	122	123.3	123.4	10.1%
Total personnel	385.8	404.8	401	411.3	407.4	5.6%
Total student enrollment	2,404	2,457	2,519	2,519	2,555	6.3%

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Texas Academic Performance Reports, school years 2017–18 to 2021–22.

ISD and Port Neches-Groves ISD, although Port Neches-Groves ISD pays its teachers more at five years and 10 years of experience. However, teacher pay at WOCCISD increases at a higher rate than at Beaumont ISD as teachers gain more experience. Among these regional districts, pay for teachers with five to 10 years of experience is higher at Port Neches-Groves ISD and Port Arthur ISD than at WOCCISD.

WOCCISD offers sign-on and incentive bonuses to recruit and retain staff. It also provides staff with instructional resources and training opportunities. Additionally, staff reported that the district conveys its appreciation to staff by providing them gift bags, t-shirts, and lunches. Staff receive a 3.0 percent salary increase each year if the WOCCISD Board of Trustees (board) approves this use of available funds. The district issues retention bonuses to returning staff in November each year, and staff have opportunities to receive additional stipends. For example, the district rewards campus

FIGURE 7–5
WEST ORANGE-COVE CONSOLIDATED ISD AND NEIGHBORING SCHOOL DISTRICTS' TEACHER TURNOVER RATES
SCHOOL YEAR 2021–22

DISTRICT	STUDENT COUNT	TEACHER TURNOVER RATE
Beaumont ISD	16,729	25.5%
Bridge City ISD	3,090	17.4%
Little Cypress-Mauriceville Consolidated ISD (CISD)	3,223	16.8%
Port Arthur ISD	7,840	20.5%
Port Neches-Groves ISD	5,186	9.5%
Vidor ISD	4,254	19.1%
West Orange-Cove CISD	**2,555**	**30.9%**

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school year 2021–22.

FIGURE 7–6
WEST ORANGE-COVE CISD TEACHER PAY SCALES COMPARED TO NEIGHBORING DISTRICTS, SCHOOL YEAR 2022–23

YEARS OF EXPERIENCE	WOCCISD	BEAUMONT ISD	BRIDGE CITY ISD	LITTLE CYPRESS-MAURICEVILLE CISD	PORT ARTHUR ISD	PORT NECHES-GROVES ISD	VIDOR ISD
0	**$50,000**	$50,000	$46,000	$43,000	$51,500	$50,000	$44,613
5	**$52,000**	$51,300	$48,193	$43,888	$53,100	$53,000	$48,400
10	**$54,500**	$54,100	$52,003	$45,969	$55,200	$55,900	$54,361
15	**$59,250**	$55,800	$55,273	$51,819	$57,700	$58,400	$56,943
20	**$63,000**	$57,500	$58,760	$56,238	$60,200	$61,500	$59,593
25	**$65,500**	$59,700	$62,187	$58,831	$62,700	$65,512	$63,441

NOTE: Teacher pay scale is for staff that have earned at least a bachelor's degree.
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated Independent School District (WOCCISD); Beaumont ISD; Bridge City ISD; Little Cypress-Mauriceville Consolidated ISD (CISD); Port Arthur ISD; Port Neches-Groves ISD; Vidor ISD, October 2022.

staff based on the number of State of Texas Assessments of Academic Readiness distinction designations the campus receives, which are based on academic achievement in subject areas such as mathematics and social studies. The superintendent reported that all campus staff receive the stipend, including child nutrition staff, bus drivers, and custodians. The district also applied to TEA's Teacher Incentive Allotment, a program that provides effective teachers additional compensation with the goal of increasing overall teacher pay.

WOCCISD staff attend job and college fairs to recruit candidates, particularly those events at which it previously had success in recruiting applicants, according to the deputy superintendent of schools. Additionally, the district has hosted its own job fair in its central office building to attract local applicants. The district also advertises on radio, billboards, and social media to communicate job vacancies. Staff reported that the district's distant location from a major city is a challenge in attracting new teachers, particularly recent graduates. Additionally, data published by the Texas Education Agency (TEA) shows that WOCCISD has a large population of economically disadvantaged students.

Campus principals and department heads review applications and interview applicants for vacant positions. The HR Department performs background checks and contacts references of applicants identified as potential candidates, and the superintendent also reviews and approves hiring these candidates. The hiring process may require several days, and HR staff reported that the approval process time may decrease by up to three days for an applicant whose fingerprints already are recorded.

New hires meet with the executive administrative assistant or the HR clerk to complete necessary paperwork. When staff attend New Employee Orientation, they sign a document to confirm their receipt of a physical or digital copy of the district's employee handbook, which includes the district's policies and procedures. Staff also learn about their health benefits options and can meet with the benefits administrator for additional support. Returning staff are informed of coverage changes and open-enrollment dates via email, flyers, and automated calls and text messages. Additionally, the benefits administrator and an insurance representative visit each campus to provide additional information to staff.

The HR Department maintains an employee handbook that is updated annually and distributed to all employees at the beginning of each school year. The handbook provides staff with information on employment, compensation, and benefits, including workers' compensation, leave and absences, the complaint and grievance process, employee conduct and expectations, and student policies and procedures, such as bullying policies and student or parent complaints procedures. Board policy is cited throughout the handbook, which provides additional information to staff. During interviews, many campus staff reported that processes in the handbook are stated straightforwardly and provide staff with a script to follow in performing many job-related activities. An employee who joins the district during the school year receives the handbook as part of the orientation process.

The district's four-level grievance process is stated in Board Policy DGBA (LOCAL). Level one is a complaint that is reported to the appropriate campus principal or the COVID-19 compliance monitor and addressed by the appropriate administrator; level two is addressed by an assistant superintendent; level three is addressed by the superintendent; and level four is addressed by the board. At levels one, two, and three, the district's complaint response consists of a written communication to the employee from the appropriate administrator. Several staff reported that the grievance process works effectively, and few grievances have reached level three during the past three school years.

Staff also reported that the district's workers' compensation process, described in the employee handbook and Board Policy CRE (LEGAL), is straightforward. The benefits administrator oversees workers' compensation claims and coordinates with the district's vendor to inform staff of a claim's progress. The district files a workers' compensation claim when staff report an injury to the campus nurse or supervisor. The district investigates and verifies the claim, which includes gathering evidence from security cameras. According to the deputy superintendent of schools, the district's workers' compensation vendor alerted the deputy superintendent of schools to a large number of claims. As a result, the deputy superintendent of schools presented additional training for auxiliary staff to reduce the number of claims. **Figure 7–7** shows that workers' compensation claims tripled from fiscal years 2019 to 2020 but since have decreased from 57 in fiscal year 2020 to 32 in fiscal year 2022.

The district's employee-related policies and procedures must be updated or revised when legislative changes affect school districts, which are communicated to the district through TASB updates, or when an incident prompts a policy change.

FIGURE 7–7
WEST ORANGE-COVE CONSOLIDATED ISD'S WORKERS' COMPENSATION CLAIMS
FISCAL YEARS 2019 TO 2022
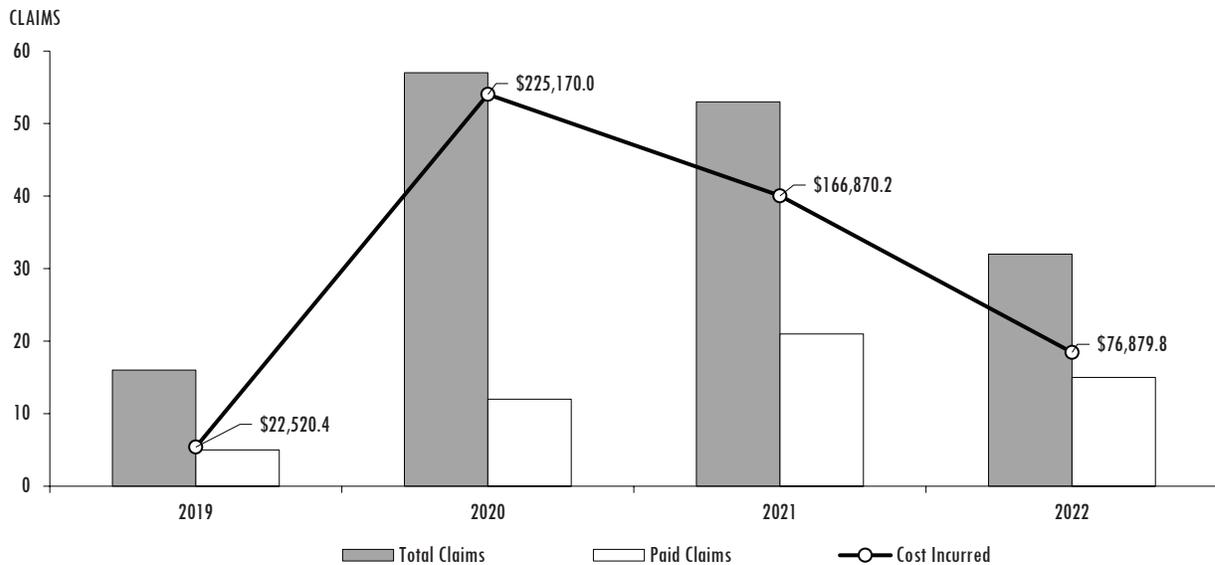
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated Independent School District, October 2022.

Staff reported that the district's attorneys review the policies before the board adopts any changes. The deputy superintendent of schools oversees the updating of policies and procedures in the employee handbook to match any legislative or local policy changes.

The deputy superintendent of schools and COVID-19 compliance monitor also oversee job description updates. Staff reported that annual staff evaluations are based on job descriptions, which are accurate and revised as needed when a position's duties change or a new position is added. The Legislative Budget Board School Performance Review Team reviewed the HR Department's job descriptions and confirmed that staff reports are current and accurate.

The superintendent reported that the HR Department is one of the district's strongest departments. Several staff said they feel supported by the HR Department.

DETAILED FINDINGS

STANDARD OPERATING PROCEDURES MANUAL (REC. 16)

WOCCISD's HR Department does not have formal written procedures for HR functions.

A written procedures manual helps define each position's expectations and guides staff in daily responsibilities. However, the district does not have documented procedures

that describe how staff perform critical HR functions such as recruitment, benefits administration, staff orientation, and maintenance of staff records. New staff are trained for tasks by veteran staff without formal procedures. This training is based on the existing knowledge of the veteran staff member and is not documented.

During interviews, HR Department staff reported that they were developing written procedures, which had not been completed or reviewed formally. The benefits administrator reported developing a new manual that includes explanations and steps for benefits administration and the district's open enrollment process. The COVID-19 compliance monitor has a manual and templates for COVID-19 tracking and reporting responsibilities. In addition, the COVID-19 compliance monitor reported developing a manual and a calendar or the deputy superintendent of schools' role for staff to follow when the deputy superintendent of schools retires. The manual is based on tasks assigned and general information provided by the deputy superintendent of schools. The deputy superintendent of schools and the executive administrative assistant reported that they set expectations for the COVID-19 compliance monitor and the HR clerk, respectively, to take notes when training them on their responsibilities to be developed into written procedures.

Although the HR Department does not have formal written procedures, staff are cross-trained to facilitate the completion of tasks when other staff are absent. The executive administrative assistant and the HR clerk are cross-trained on each other's duties. The executive administrative assistant formerly was the HR clerk and can perform the HR clerk's duties as needed. In addition, the deputy superintendent of schools is training the COVID-19 compliance monitor on performing the deputy superintendent's HR duties. Staff reported that several of the benefits administrator's duties could be distributed among other HR staff and other staff said that the deputy superintendent of schools has experience with benefits administration duties.

Effective school districts have comprehensive, documented operating procedures, which help districts develop work standards, impose consistency, and implement overall operational efficiency. Additionally, detailed written procedures preserve institutional knowledge if staff are absent or leave the district. Documented procedures also may serve as a reference for veteran staff, particularly for responsibilities performed seasonally or annually, such as open enrollment for employee benefits.

A lack of written procedures may increase the district's vulnerability to litigation. For example, if a district lacks consistency in job postings and interview and vetting procedures, the district's fairness might be questioned in hiring one applicant rather than another. Written procedures provide more assurance that district staff follow consistent practices.

TASB offers best practice models and is available to assist school districts with developing HR procedures and regulations. TASB's Administrative Procedures Manual is a guide for developing additional written procedures for HR functions, which includes the following topics:

- recruitment;
- job posting;
- federal Office for Civil Rights compliance;
- hiring process;
- staff records;
- management of job descriptions;
- management of performance evaluations;
- training in best practices;

- new staff orientation; and
- staff benefits.

Standard operating procedures (SOP) are written documents containing step-by-step instructions for a certain task. An SOP details who is responsible for a task and helps ensure that the organization's operations comply with industry regulations. SOPs help staff follow the correct methods for all the organization's most essential tasks.

WOCCISD should develop an SOP manual for all HR roles and responsibilities.

To accomplish this recommendation, the district should charge the deputy superintendent of schools with the following actions:

- collaborate with HR staff to identify the responsibilities for each position, using staff's job descriptions as a guide;
- assign HR staff to develop an SOP for each position;
- develop a timeline for staff completion of their SOPs and review them for accuracy and alignment with job descriptions;
- combine all HR SOPs into one manual for all HR Department functions;
- make the SOP manual readily accessible to all HR staff, either physically or digitally; and
- require HR staff to review and update their SOPs as tasks are updated.

The district could implement this recommendation with existing resources.

Since the time of the review, the deputy superintendent of schools has directed the HR staff to develop an SOP for their assigned and shared tasks. HR staff were provided with an example of how tasks should be written and given a completion date of January 2024.

STAFF TURNOVER (REC. 17)

WOCCISD does not track staff turnover effectively.

As shown in **Figure 7–5**, WOCCISD has a higher rate of teacher turnover than its neighboring regional districts, and its turnover rate is nearly double the state average. Despite this rate, the district lacks an effective process to assess the available data to determine its cause. One possible

explanation, which represents the opinion of some staff, is that the district's location may contribute to higher teacher turnover. However, the surrounding regional districts are not experiencing the same rate of turnover. Data provided by the district shows that WOCCISD tracks teacher turnover at the district level but not by campus. During interviews, staff reported that teacher turnover affects some campuses more than others.

Without a formal process to assess why so many teachers are leaving WOCCISD, the district cannot address the problem effectively. By understanding why some teachers leave and why some campuses are better able to retain their teachers, campus and district decision makers could better target their resources to retain teachers, especially in the subject areas in greatest demand.

The district also does not track auxiliary and paraprofessional staff turnover. During interviews, staff reported a high turnover rate among custodians, bus aides, and paraprofessional staff. However, the district could not provide any official turnover rates among these positions, nor could it identify whether this turnover trend had been occurring for several school years or had developed only recently.

WOCCISD reportedly sends satisfaction surveys to staff, but the district did not provide survey samples or data to the review team, nor did staff report knowing how the district uses the results. Additionally, the district conducts exit surveys when staff leave the district's employment, but their participation in the surveys is voluntary and staff again reported not knowing how the district uses the results.

A high turnover rate among staff is detrimental to school district operations and the overall education of students. Staff turnover increases district expenses through lost productivity, updating security and computer systems, new staff training, advertising and recruiting, and sign-on bonuses. A high turnover rate also can reduce employee morale. Without examining why the district has high staff turnover and addressing these issues, the district risks fostering a work environment that results in low employee morale. The persistence of such a work environment can diminish the district's efforts to attract and retain high-quality staff.

The Employers Association Forum (EAF), a member-based nonprofit organization, states that tracking employee turnover can help organizations evaluate why staff are leaving and determine the cost to replace them. EAF also states that

understanding why an employee is leaving is key to identifying and resolving turnover issues within an organization. Mansfield ISD has developed a detailed exit survey that provides exiting staff the opportunity to share a broad range of information about experiences at the district, which may include evaluating the staff's supervisor directly.

An important aspect of staff satisfaction surveys is communicating results to staff and developing action items based on the results. Survey Monkey's website lists important components of staff satisfaction surveys and steps to follow after answers have been submitted. Effective satisfaction surveys focus on specific areas that an organization wants to evaluate, such as benefits, compensation, workplace climate, supervisor performance, and professional advancement.

WOCCISD should develop a comprehensive turnover tracking process that uses survey data to determine staffing retention opportunities.

The deputy superintendent of schools should perform the following actions:

- assign principals and department heads to track staff turnover for their campuses or departments, including auxiliary and paraprofessional staff turnover, and report it monthly to the HR Department;

- develop a document to track staff turnover by campus and department that includes exit survey data, specifically staff's reasons for leaving positions;

- require departing staff to complete an exit survey administered by HR Department staff;

- use previous exit survey data to develop a staff satisfaction survey that will provide data to the district on possible recurring issues;

- collaborate with the superintendent, CFO, principals, and department heads to review the turnover data by campus and department and evaluate the cost for retaining staff compared to recruiting and training new staff;

- collaborate with the superintendent and the executive leadership team to analyze staff satisfaction survey data and develop an action plan to address the issues identified; and

- communicate satisfaction survey results to district staff in a timely manner, and assign actions based on district and staff needs.

The district could implement this recommendation with existing resources.

Since the time of the review, staff reported that the district is researching survey platforms with data analytics capabilities to assist the HR Department in identifying turnover trends for all job categories, which will aid the district with its retention efforts.

ADDITIONAL OBSERVATIONS

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

RECORDS WAREHOUSE

WOCCISD authorizes several district staff access to its records warehouse, which is located within the district's central office building and contains district financial records and former student and personnel files. District records are maintained and disposed of in accordance with records retention laws. The district contracts with a company that provides annual document destruction services. Although the records warehouse is always locked, staff reported that many staff have keys to the warehouse, including the deputy superintendent of schools, the HR executive administrative assistant, the HR clerk, the benefits administrator, Finance Department staff, custodians, and maintenance staff. Additionally, staff stated that reams of printer paper are stored in the warehouse, which staff retrieve as needed. The records are kept in boxes organized by year and record type, but no additional security is provided, such as locked filing cabinets. Furthermore, the records are not protected from fire or water damage within the warehouse.

Considering the sensitive nature of the documents in the records warehouse, the district should evaluate which staff require access to the warehouse and limit access accordingly. The deputy superintendent of schools should maintain a list of each staff who has a key to the warehouse. Additionally, the district should evaluate any safety measures necessary to protect records from fire and water damage. Staff reported that the district is evaluating transitioning its records into a digital format. Although this transition could be costly, it would help decrease or eliminate the need for the district's records warehouse and would restrict access to sensitive documents to relevant staff. The district should evaluate the cost of transitioning

to a digitized records system, which also would eliminate the need for outsourcing document destruction.

Since the time of the review, the district has changed the locks on the records warehouse and provided keys to three pertinent staff only. Additionally, the district has contracted with a company to begin digitizing its records.

BENEFITS

WOCCISD does not evaluate benefits regularly. The benefits administrator is responsible for evaluating benefits for all district staff. Staff reported that the district covers $315 of each staff's health insurance benefits costs, and several staff said that the benefits provided are adequate for their needs. However, staff reported that the district has not performed its own evaluation of benefits because it has outsourced this responsibility to the district's insurance representative, which has provided a high level of support for several years. District administrators evaluate supplemental benefits annually with the vendor representative.

The deputy superintendent of schools and the benefits administrator should establish a process to evaluate staff benefits annually to ensure the district is receiving the best value possible. Benefits evaluation should include a staff satisfaction survey to determine whether current benefits are meeting staff's needs.

TEACHER MENTOR PROGRAM

The district is not monitoring its new teacher mentoring program effectively. WOCCISD's new teacher mentoring program pairs new teachers with a veteran teacher who typically teaches the same grade level or subject area as the new teacher. Data provided by the district shows that teacher mentors receive a $250 stipend. Due to high teacher turnover, staff reported that some veteran teachers mentor as many as three new teachers. The district provides veteran teachers with a mentoring handbook that includes discussion topics and timelines for how often mentoring pairs should meet throughout the school year. However, the LBB review team found that the mentor handbook was not distributed consistently to veteran teachers at all campuses. Associate principals oversee the new teacher mentoring program at their respective campuses and are responsible for communicating mentoring expectations and materials to staff.

The assistant superintendent of curriculum and instruction should communicate the mentoring program expectations to associate principals and provide opportunities for regular

feedback from teachers. Such feedback would provide the district data on the areas where new teachers need more support and could limit or decrease the district's high rate of teacher turnover. TEA also provides supplemental resources for teacher mentoring programs through its Mentor Program Allotment webpage.

Additionally, the district should evaluate whether a teacher residency program could supplement its teacher mentor program by providing long-term support for new staff and giving them an opportunity to engage with the West Orange community. Through a teacher residency program, districts partner with a local postsecondary institution to provide a paid one-year residency for students enrolled in an education preparation program. TEA provides information and resources regarding paid teacher residencies through its Texas Strategic Staffing webpage.

Since the time of the review, the HR Department has communicated clear procedures and expectations on the district's new teacher mentoring program to campus administrators, including steps to monitor program implementation and opportunities for mentors and mentees to provide feedback.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The LBB's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

8. FACILITIES MANAGEMENT

FINDINGS

♦ West Orange Cove Consolidated Independent School District (WOCCISD) lacks a long-term, comprehensive, facilities master-planning process.

♦ WOCCISD lacks a detailed energy-management plan to optimize energy usage.

RECOMMENDATIONS

♦ **Recommendation 18: Establish a five-year facilities master plan and update the plan annually.**

♦ **Recommendation 19: Develop, document, and implement a districtwide energy-management plan to conserve energy and reduce annual energy costs.**

BACKGROUND

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

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

Figure 8–1 shows West Orange-Cove Consolidated Independent School District's (WOCCISD) facilities management organization for school year 2022–23. The district's chief financial officer (CFO) is responsible for supervising the maintenance function and managing facilities. A director of maintenance manages the Maintenance Department, which consists of a maintenance supervisor and 16 maintenance workers; a custodial supervisor and 39 custodians, including four head custodians; and an administrative assistant. The district's 16 maintenance workers are organized by trade: carpenters; plumbers; heating, ventilation, and air conditioning (HVAC) technicians; and groundskeepers.

WOCCISD has five instructional facilities and two noninstructional facilities. The instructional facilities include

FIGURE 8–1
WEST ORANGE-COVE CONSOLIDATED ISD MAINTENANCE DEPARTMENT ORGANIZATION
SCHOOL YEAR 2022–23
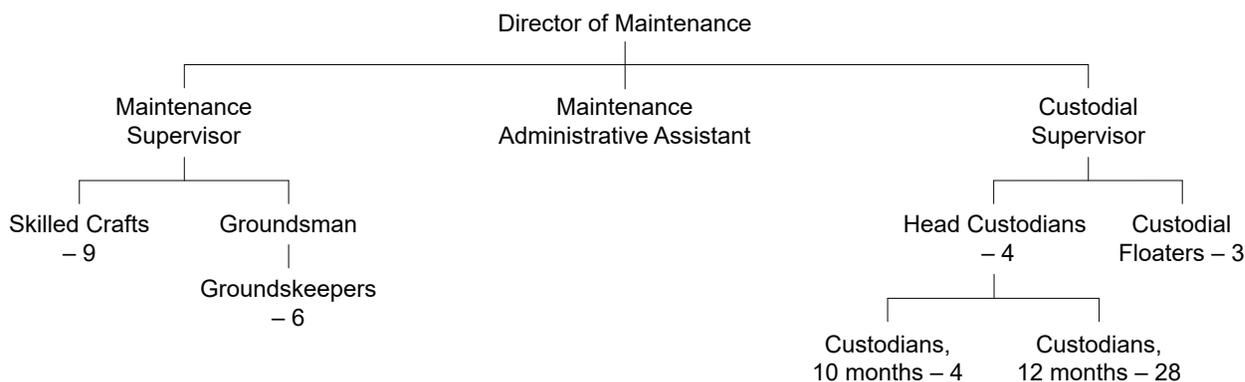
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, October 2022.

North Early Learning Center; West Orange-Stark Elementary School; West Orange-Stark Middle School; West Orange-Stark High School, which includes the Career Center and West Orange-Stark Early College High School; and West Orange-Stark Academic Alternative Center. West Orange-Stark Academic Alternative Center is located on the same property as the district administration building and serves as the district's disciplinary alternative education program. The two noninstructional facilities include the district administration building and the West Orange Transportation Building. WOCCISD's total facility square footage is approximately 776,655 square feet, excluding a new transportation facility and event center. **Figure 8–2** shows WOCCISD's facilities, the years of their construction, and the square footage for each district building.

The Legislative Budget Board's School Performance Review Team visited the district in October 2022. At that time, the district was completing construction on a new event center and a new transportation facility to house all district-owned vehicles. The new event center and transportation facility were constructed on property owned by the district near West Orange-Stark High School, and the facilities were opened in May 2023.

During onsite observations of WOCCISD's facilities, the review team noted that campus buildings were clean and appeared to be cared for well by the custodial staff, and the exterior grounds were manicured and regularly maintained. Additionally, survey responses from parents and district staff indicate that a large majority of respondents agree that schools are clean and maintained properly.

Maintenance staff perform most of the general and preventive maintenance for district facilities. Duties are assigned

FIGURE 8–2
WEST ORANGE-COVE CONSOLIDATED ISD FACILITIES SCHOOL YEAR 2022–23

FACILITY	YEAR OF CONSTRUCTION (1)	SQUARE FOOTAGE
North Early Learning Center	1964; 1973	68,842
West Orange-Stark Elementary School	2010	248,000
West Orange-Stark Middle School	1942; 1954; 1992; 2010	167,870
West Orange-Stark High School	1966; 1992	227,909
West Orange-Stark Academic Alternative Center	1980; 1983	63,638
West Orange Transportation Building	1955; 1987	8,396
Total		**776,655**

NOTE: Multiple years of construction indicate additional buildings were constructed on the site (e.g., annex, gymnasium, office).
SOURCES: Legislative Budget Board School Performance Review Team; West Orange-Cove Consolidated ISD, Facility Inventory, October 2022.

according to the employee's skilled trade (e.g., plumbing, carpentry, HVAC). The department also maintains a preventive maintenance schedule that specifies how often each maintenance task is performed. Examples include preventive maintenance performed on electrical systems, HVAC equipment, plumbing, water fountains, and maintenance vehicles, and annual inspections of all major building equipment.

Figure 8–3 shows the actual facilities maintenance and operations costs for WOCCISD and its peer districts for school year 2020–21. Peer districts are districts similar in size and other characteristics to WOCCISD that are used for

FIGURE 8–3
WEST ORANGE COVE CONSOLIDATED ISD AND PEER DISTRICTS' FACILITIES MAINTENANCE AND OPERATIONS COSTS SCHOOL YEAR 2020–21

DISTRICT	FACILITIES MAINTENANCE AND OPERATIONS EXPENDITURES	PERCENTAGE OF ALL FUNDS	ENROLLMENT	COST PER STUDENT
WOCCISD	**$4,235,253**	**14.0%**	**2,519**	**$1,681**
Bellville ISD	$2,218,839	9.1%	2,184	$1,016
Coldspring-Oakhurst Consolidated ISD	$2,085,485	10.5%	1,528	$1,365
Sweeny ISD	$2,898,063	12.1%	1,847	$1,569
Peer average	$2,400,796	10.6%	1,853	$1,317

NOTE: Enrollment numbers shown are from the school year 2020–21 Texas Academic Performance Report, the last reported period of actual financial data.
SOURCES: Legislative Budget Board School Performance Review Team, October 2022; Texas Education Agency, Public Education Information Management System, school year 2020–21.

comparison purposes. The peer districts for WOCCISD are Bellville ISD, Coldspring-Oakhurst Consolidated ISD, and Sweeny ISD. WOCCISD spent $4.2 million for facilities maintenance and operations during school year 2020–21, the most recent reporting period, which was greater than all peer districts and the peer district average. WOCCISD's facilities maintenance and operations expenditures represented 14.0 percent of its total expenditures and cost an average of $1,681 per student. For school year 2021–22, WOCCISD budgeted approximately $4.4 million for facilities maintenance and operations.

DETAILED FINDINGS

MASTER PLANNING (REC. 18)

WOCCISD lacks a long-term, comprehensive, facilities master-planning process.

The Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter CC, Section 61.1036(a)(9), encourages school districts to formulate a long-range facilities plan before making major capital investments. A facilities master plan typically includes the following elements:

- guiding principles that broadly address the educational and operational goals of the district when planning for future facility needs;

- a capacity analysis of the total and functional space, utilization, and efficiency of district facilities;

- an educational adequacy assessment to determine how well the district's current and future educational programs are supported by its facilities and future facility plans;

- a condition assessment of the current physical state of facilities, including building exteriors, building systems, code compliance, and maintenance needs;

- a site safety and security evaluation that assesses safety and security measures for the protection of students, staff, and visitors; and

- identification of priority projects, including strategies to plan and budget appropriately for projects most important for improving the educational environment of district facilities.

Long-rage facility master plans are intended to ensure that facilities support the district's educational goals by identifying existing facility conditions, facility priorities, and funding

options. The director of maintenance reports meeting regularly with the superintendent to discuss and plan upcoming, large-scale maintenance or construction projects. The superintendent is primarily responsible for planning and initiating the district's construction projects. The director of maintenance provides input on how to plan for staffing, maintenance, and ongoing support related to construction of new facilities or any remodeling or additions to existing facilities. This planning process is included in annual revisions to the district's 1-3-5 Plan, a strategic planning tool implemented by the current superintendent that tracks goals and projects budget outlays for timeframes of one, three, and five years. However, these efforts are not part of a long-term facilities master-planning process. For example, staff reported that discussions about future construction projects and building modifications have occurred without the benefit of an assessment of the current condition of district facilities or any formal analysis of how existing facilities are being used. The district's tentative outline of future large-scale construction projects and future facilities' needs are based primarily on the superintendent's vision.

One element of a facilities master plan that the district lacks is an annual conditions assessment, which is the process of measuring the condition and functionality of district buildings and infrastructure to confirm they are suitable and appropriate for student and staff needs. Without an annual conditions assessment process, the district may be unable to identify and address critical maintenance issues promptly. The lack of facilities planning may hinder educational opportunities and restrict the district's ability to use specialized facilities as intended.

At the time of the review team's onsite visit, the superintendent had hired a construction company to manage the completion of the new transportation facility and event center located near the high school. The director of maintenance is tasked with the staffing and ongoing maintenance of the new facilities. Because the new construction is not included in a comprehensive facilities master planning process, the district cannot determine whether the new facilities will align with the projected student growth or additional construction projects.

Additionally, many of the district's facilities are more than 20 years old and consist of several separate buildings, which often requires students to commute outdoors as they change classes. According to the director of maintenance, the middle school is an older facility that soon will require replacement. However, without a districtwide facilities master plan and timeline, it will be difficult for the district

to plan, prioritize, and budget for this facility or any future facility construction needs.

Without an updated master plan, the district may not be assessing the facility needs of each campus effectively, nor prioritizing those needs to align with the budget. The district risks neglecting critical projects due to a lack of a facility conditions assessment or available funding. In addition, the district's informal facilities plans may be delayed or undone due to staff attrition or turnover, and the district may be unable to optimize learning and safety in facilities without ongoing condition assessments.

The Texas Association of School Boards (TASB) provides facilities assessment services to assist districts in facilities planning, including the following services:

- analysis of facility capacity;

- assessment of educational adequacy;

- assessment of site, systems, and components;

- accessibility evaluation for compliance with the federal Americans with Disabilities Act; and

- identification of priority facility projects.

WOCCISD should establish a five-year facilities master plan and update the plan annually.

The district should implement a strategic facilities-planning process to develop the five-year master plan. This preparation should include the following key steps:

- identify a committee of stakeholders, including the superintendent, maintenance and custodial staff, campus staff, parents, community representatives, students, and board members;

- solicit input from committee members and other stakeholders;

- assess whether district staff have the expertise to conduct a comprehensive facilities needs assessment or whether the district should solicit bids from vendors who have the requisite expertise;

- conduct a comprehensive facilities needs assessment of district facilities to inform the master planning process;

- identify existing resources and future funding sources for needed improvements;

- develop a facilities inventory that identifies the use and size of each room at each campus; and

- identify current needs for safety, accessibility, and energy improvements.

After collecting the necessary data, the district should evaluate the needs, priorities, and capacity of its facilities by completing the following actions:

- analyze student enrollment to establish accurate enrollment projections for at least five years;

- assess the capacity of each campus by reviewing standards that govern student-to-teacher ratios and the minimum square footage required per student in classrooms, gymnasiums, cafeterias, and libraries;

- determine the training necessary to enable maintenance staff to implement and support planned improvements; and

- establish priorities to maintain the district's facility investments and educational programming priorities to provide learning environments that meet the district's changing curriculum.

Additionally, the district should develop the five-year facilities master plan, which should include the following information:

- each facility's operating status;

- each facility's goals and objectives;

- each facility's recommended improvements, including projected costs;

- expected changes to facility needs, including curriculum, and technology, safety, and security needs;

- each facility's local, state, and federal requirements; and

- a process to monitor the master plan throughout its duration.

The facilities master planning committee should submit the facilities master plan to the WOCCISD Board of Trustees and superintendent for review and approval and update the plan annually to provide for the ongoing assessment of facility needs.

The district could implement this recommendation with existing resources.

ENERGY MANAGEMENT (REC. 19)

WOCCISD lacks a detailed energy-management plan to optimize energy usage.

The Maintenance Department employs two HVAC technicians and an electrician to service heating, cooling, and electrical systems at campuses and district buildings. According to campus principals, most repair orders are initiated by the principals or campus staff and communicated to the Maintenance Department. Campus staff independently have adopted policies to manage lights and thermostats.

No staff is assigned to track or review the district's monthly utility bills to identify errors, discrepancies, significant changes, or deviations in use. The Board of Trustees does not have a policy requiring new equipment that the district procures to be energy efficient.

According to Energy Star, a federally administered program that promotes energy efficiency, energy is the largest operating expense in buildings, and the average building wastes 30.0 percent of the energy it consumes.

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

- strategies for achieving energy efficiency that result in net savings for the district, or which could be achieved without financial cost to the district; and

- the initial, short-term capital costs and lifetime costs and savings that could result from implementing each strategy.

An effective energy-management plan includes strategies for using the minimum amount of energy while continuing to provide a desired level of comfort to building occupants. These strategies should include the education of building staff, enhancements to or automation of building controls, proper maintenance of existing equipment, and installation of energy-efficient equipment as systems are replaced.

WOCCISD has not developed a comprehensive energy plan that includes these strategies or identifies actions to support the district's annual reduction in energy usage. Without a comprehensive energy-management plan, WOCCISD cannot identify strategic actions to support an annual

reduction in energy usage and could fail to meet the statutorily required reduction of energy consumption. Furthermore, the absence of an energy-management plan increases the risk that the district could engage in energy-management contracts that do not support the district's academic and operational goals and objectives effectively.

The State Energy Conservation Office (SECO), a program within the office of the Comptroller of Public Accounts, offers free assessments of school district facilities to identify opportunities for savings, which may result from retrofitting systems or through the maintenance and operation of facilities. This service, known as a preliminary energy assessment (PEA), is intended to identify and recommend cost-effective renovations, equipment upgrades, or changes to building operations that could be implemented to reduce utilities costs or consumption.

PEA includes the following elements:

- analysis of utility bills and other building information to determine energy and cost utilization indices for facilities;

- recommendations of maintenance procedures and capital energy retrofits that will reduce energy consumption;

- recommendations for the development and monitoring of customized procedures to control the run times of energy-using systems;

- onsite training for building operators and maintenance staff;

- follow-up visits to assist with implementing the recommendations and to determine savings associated with the project;

- development of an overall energy-management policy;

- assistance with developing guidelines for efficiency levels of future equipment purchases; and

- facility benchmarking using the Energy Star Portfolio Manager online tool.

WOCCISD should develop, document, and implement a districtwide energy-management plan to conserve energy and reduce annual energy costs.

To implement this recommendation, the director of maintenance should develop an energy-management plan that includes a mission statement and specific energy conservation and building management guidelines. These guidelines should include policies for setting classroom

temperatures and strategies for communication and enforcement. The energy-management plan also should include the following activities:

- establish monthly reviewing and monitoring of electric usage by the director of maintenance or designated staff;

- evaluate installed controls to confirm that systems are functioning correctly, which includes checking independent motion detectors for controlling lights and HVAC systems, checking night and weekend set-back controls, and conducting maintenance tasks such as fixing leaks to reduce water consumption;

- perform energy surveys to identify solutions for systems or operational practices that are wasting energy;

- develop districtwide procedures for closing windows and doors and for controlling exhaust fans to reduce the cost of heating and cooling;

- adopt standards for routine maintenance that require the use of energy-efficient equipment; for example, all re-lamping or fixture replacements should be based on high-efficiency fluorescent or LED technology; and

- draft an incremental plan to increase staff awareness; for example, encourage district staff to place equipment with high-energy use, such as coffee pots and refrigerators, in common rooms instead of operating personal equipment in classrooms and offices.

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

Since the time of the review, the district has developed an energy management plan dated August 2023 that has been distributed to staff for implementation.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATION

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

WOCCISD's work-order system does not have the necessary capability to facilitate data-driven decision making.

The district manages its daily maintenance operations through work-order requests that WOCCISD staff enter into an online system. The district uses a web-based work-order-management system structured specifically for educational facilities. The Maintenance Department's use of the system is limited to generating and printing work orders. According to the director of maintenance, the system has been sufficient for tracking work orders, but it does not have the capacity to include costs to enable the department to generate a report determining the overall expenses associated with specific repair and maintenance work. Without the ability to track costs related to specific repairs and maintenance adequately, the district may not be able to determine the overall cost of repairs to compare maintenance costs versus the cost to replace older equipment.

WOCCISD should determine whether the Maintenance Department's current work-order system has the capability to provide enough detailed information to aid in the district's tracking and decision-making processes. If the department determines that the existing system lacks the input of actual costs in specific work orders, the director of maintenance and CFO should explore the implementation of a system that has the capabilities necessary to meet the district's needs.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.