

Cotulla Independent School District



Cotulla Independent School District

Legislative Budget Board Staff and SDSM, Inc.

June 2011

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LEGISLATIVE BUDGET BOARD

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June 15, 2011

Ms. Elizabeth Saenz
Superintendent
Cotulla Independent School District

Dear Ms. Saenz:

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

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

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

The Legislative Budget Board engaged SDSM, Inc. to conduct and produce this review, with LBB staff working in a contract oversight role.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John O'Brien", written over a horizontal line.

John O'Brien
Director
Legislative Budget Board

cc: Mr. Deonicio Ramirez, Jr.

Mr. George Trigo
Mr. Alfredo Zamora, Jr.
Ms. Raquel Nunez
Ms. Kim Hoff
Mr. Scott Reese
Mr. Juan Dominguez

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EXECUTIVE SUMMARY

Cotulla Independent School District's (CISD's) school performance review notes 11 commendable practices and makes 59 recommendations for improvement. This Executive Summary highlights the district's significant accomplishments and recommendations. A copy of the full report is available at www.lbb.state.tx.us.

SIGNIFICANT ACCOMPLISHMENTS

- CISD has made technology access a priority that is reflected by the degree to which this technology is available throughout the district. According to a February 2011 survey of CISD administrators and teachers, 81 percent of the teachers and 86 percent of administrators believe the age and condition of district computers to be appropriate. More than 85 percent of CISD teachers and administrators are also confident in the ability of the district's teachers to use technology in instruction. Teachers use technology in all subject areas in a variety of ways. For example, an elementary Physical Education teacher uses a software program to show different exercises to the students. Teachers use technology to show handouts, link to science websites, use math online software, access health information, connect to Regional Educational Service Center XX (Region 20) for distance learning sessions or obtain professional development.
- The CISD School Health Advisory Council (SHAC) has developed partnerships with outside organizations to promote the health and well-being of students. In February 2011, the SHAC brought together community resources to host the Second Annual Coordinated School Health Forum to address health issues and foster student achievement by helping students establish lifelong healthy behaviors to by reducing the physical, emotional, and social problems that interfere with student function. The SHAC also partnered with Region 20 in San Antonio to present pertinent information on the issue of bullying in schools. In addition to hosting forums and presentations to promote healthy lifestyle choices, the SHAC further encourages parental involvement by offering students a reward of a free "jeans" day or "out of uniform" day if their parents attend the events.

The events coordinated by the CISD SHAC are an important means of incorporating education into choices made for lifelong healthy living, nutritious meals, policies that support a positive psycho-social and hazard-free environment, involvement of families and communities in promoting the well-being of students, opportunities for CISD staff members to foster their own well-being, and services that prevent or treat mental and physical health conditions that potentially interfere with student learning.

- CISD has teamed with LaSalle County to provide a state commissioned law enforcement officer at the district at little additional cost. In 2009, CISD hired a School Resource Officer (SRO) and the county sheriff commissioned him as a reserve deputy. Prior to the collaboration, CISD had an unruly student population, and local law enforcement responded to calls of criminal activity on district property. The district SRO is responsible to the district for responding to criminal activity on district property and to the LaSalle County Sheriff for responding to calls for service on district property, making arrests, and completing any necessary reports. The district and the Sheriff have agreed upon the policies that control the SRO's law enforcement actions. The district directs the SRO's daily assignments, but once law enforcement action is needed the SRO takes on the role of deputy and responds. This relationship is mutually beneficial with the Sheriff's Office having a deputy that can respond without reducing patrol resources, while CISD having a law enforcement presence without associated departmental costs. Local resources are efficiently deployed, and at little additional cost for either agency.
- CISD operates a single tier bell schedule, which is an efficient and cost effective method to pickup and deliver students in this rural low-density school district. This bell schedule requires that students in all grades ride the bus together and that each individual bus route be capable of servicing each school in the district. While this type of routing scheme is not typically considered to promote efficiency, in the case of CISD it is the most appropriate method for

the pickup and delivery of students. CISD has also instituted a practice that increases both the efficiency and effectiveness of services by allowing one bus to be staged in the Fowler area.

SIGNIFICANT FINDINGS

- The ability of the board to effectively operate is undermined by a lack of methods and protocols defining relationships between and among school board members and the superintendent.
- CISD lacks meaningful two-way communication between central administration and other district stakeholders.
- CISD lacks a systematic process to evaluate the effectiveness of its instructional programs in meeting programmatic goals.
- CISD does not implement its curriculum consistently with considerable differences by grade level and content area.
- CISD's inadequate financial management, lack of internal controls and transparency has resulted in several discrepancies or unexplained financial or fiscal issues in the district.
- CISD does not have adequate internal controls on financial processes, increasing the risk of error and misappropriation.
- Transportation operations at CISD are conducted in the absence of specific policy and procedure guidance for service expectations.
- CISD does not have a recruitment and retention process that consistently attracts and develops employees that can meet district performance expectations.
- CISD has not developed targeted standards for food, labor, and non-food expenditures as a percentage of revenue, or developed a system for routinely monitoring those expenditures to ensure that the Child Nutrition Program (CNP) fund remains within budgeted amounts and is fiscally sound.

SIGNIFICANT RECOMMENDATIONS

BOARD GOVERNANCE

Recommendation: Obtain additional guidance for governance issues from external authorities and implement self-policing guidelines to encourage teamwork. The ability of the board to effectively operate is undermined by a lack of methods and protocols defining relationships between and among school board members and the superintendent. Interviews with a majority of school board members indicated a high level of distrust between board members and district management that has resulted in operations problems causing disruption to both the board meeting process and administrative activities. Examples include instances of disregard for one another and meeting participants at school board meetings, perceptions that input from campus administrators, teachers, parents, and the community are not included by district management when information is presented to the board on district initiatives, and perceptions that information received from district management is presented with preferential treatment towards certain district programs and initiatives. The district should pursue the use of executive coaching or group conflict resolution to overcome the breakdown in the school board's decision-making ability. This should coincide with implementation of self-policing guidelines to encourage teamwork. Finally, the superintendent should distribute weekly notices to all board members to communicate district issues and accomplishments from the previous week.

COMMUNICATION

Recommendation: Develop communication procedures that would increase the opportunity for district stakeholders to provide meaningful input into the decision-making processes of key district initiatives. CISD lacks meaningful two-way communication between central administration and other district stakeholders. There is a general perception among campus administrators and teachers that central administration is unwilling to consider other opinions and does not collaborate or seek input on the implementation of districtwide initiatives prior to mandating their use. This limits the ability of the district to effectively implement new initiatives. Additionally, campus administrators frequently mentioned that central administration does not seek their input on large issues facing the district or other key functions such as the budget, facility planning, or curriculum. Directives and educational initiatives are mandated from the central administration with no input, and subsequently little to no buy-in from campus

level staff responsible for implementing these programs. The lack of effective dialogue and collaboration between the central administration and its campuses has created a measure of dissension, low morale, fear of reprisal and job loss, and diminished trust among and between central and campus administrators. Additionally, CISD presents few opportunities to garner substantive input on decision-making issues such as district budgeting and facilities planning from parents, local citizens, and other district stakeholders. To encourage effective two-way internal communication, CISD should institute monthly staff meetings with campus personnel to give central administration the opportunity to present information on the district's decision-making issues and obtain staff input. To encourage greater external communication, the superintendent and school board should work together to create a positive relationship with the community by advertising and holding public forums on all major policy issues in order to solicit input.

PROGRAM EVALUATION

Recommendation: Develop and implement a program evaluation system to include a report to the school board.

CISD lacks a systematic process to evaluate the effectiveness of its instructional programs in meeting programmatic goals. Aside from analysis of student performance on benchmark tests and the state assessment, and monitoring its bilingual/English as a Second Language and special education programs based on its continuous improvement plans, the district does not perform evaluations of its instructional programs. Program evaluation is a key component of accountability and improvement in student performance. The primary reason for conducting program evaluations is to collect quantitative data and qualitative evidence that will help with making informed decisions about various programs. Without evaluation, districts are limited in their ability to determine if a program is meeting the specific goals for which the program was instituted. The program evaluation system should have a timetable ensuring that the district evaluates all instructional and instructional support programs on a regular basis to determine their effectiveness with a three to five year horizon to ensure that all programs will be evaluated each year, identify when these evaluations will take place, and ensures all significant programs receive an evaluation over that time period. The evaluation should define the purpose and scope of the program, articulate the qualitative and quantitative measures to evaluate program effectiveness, specify the type of data to collect and methods of data collection, describe

how to analyze the data, and outline the most significant contents of an evaluation report. The report should include specific recommendations and associated action plans that target staff responsible for implementing the recommendation. A follow-up report that documents whether the district has implemented the recommendations and how implementation affected student achievement should be provided to the school board either individually or in a consolidated annual report.

CURRICULUM

Recommendation: Conduct a needs assessment of the curriculum management system to determine the underlying causes behind the inconsistent implementation, develop an implementation manual based on this assessment, and institute a uniform lesson review system to monitor curriculum implementation.

CISD does not implement its curriculum consistently with considerable differences by grade level and content area. CISD adopted the CSCCOPE curriculum in school year 2008–09. CSCCOPE is a curriculum management system developed by the Texas Education Service Center Curriculum Collaborative (TESCCC). According to district administrators, implementation is highest at the elementary level and lowest at the high school level. In its third year of implementation, teacher buy-in is still not complete. CISD teachers that were interviewed find it not user friendly, that CSCCOPE is not always consistent with the state assessment, and that assessments are not rigorous causing teachers to have to develop their own assessments or supplement the CSCCOPE assessments. Exacerbating the curriculum implementation concerns, CISD teachers at all grade levels indicated they did not have instructional materials and other CSCCOPE specific resources and, therefore were not able to implement the CSCCOPE lessons. The need for a curriculum management system that is used districtwide and consistently by teachers is important, especially for a district like Cotulla with a history of low academic student performance. This needs assessment should include an inventory of the various challenges and recurring problems that teachers have had with implementing CSCCOPE into their work. The scope of this needs assessment should be wide enough to capture issues that support curriculum, but which do not specifically concern the curriculum management system. This will give district administrators a clearer picture of where the largest roadblocks to implementation reside and to identify the underlying causes to these obstructions. Following this needs assessment, a CSCCOPE implementation manual tailored to

the district should be developed with strategies on how to implement CSCOPE in each grade level and content area. This information will allow school administrators and teachers to direct their time and resources in an efficient manner and develop lesson plans for the identified topics/areas. Finally, CISD should implement a rigorous lesson review system to ensure that the lessons teachers prepare are consistent with the CSCOPE instructional approach.

FINANCIAL MANAGEMENT

Recommendation: Cooperate with the Texas Education Agency (TEA) regarding the recommendation of the Legislative Budget Board that TEA conduct an investigation of Cotulla ISD under the provisions of the Texas Education Code §39.056, on-site investigations, and §39.057, special accreditation investigations. CISD's inadequate financial management, lack of internal controls and financial transparency has resulted in several discrepancies or unexplained financial or fiscal issues in the district. This includes an inability of the CISD administration to provide the review team with basic financial documentation that is generally readily available such as a list of all bank accounts by type and use, a record of all certificates of deposit and balances, a list of all pledged securities, and copies of investment reports. Furthermore, other discrepancies within the department and other operational areas were noted by the review team. These include:

- delays in providing financial information and or statements to the board leading to one frustrated board member and the review team filing open records requests to the district;
- lack of internal controls or safeguards in several areas eventually leading to fraudulent activity in the student activity funds area;
- lack of contract management;
- inability to calculate state revenues accurately for the last three years with budgeted state revenue exceeding actual revenues;
- lack of a fund balance policy that permitted significant fund balance reductions from 2007–08 to 2009–10; and
- inability to post financial information on the district's website in a timely manner as required by law.

The LBB has requested a TEA investigation regarding these issues.

INTERNAL CONTROLS

Recommendation: Develop internal control processes related to expenditures and management of district finances and periodically audit to ensure procedures are followed. CISD does not have adequate internal controls on financial processes, increasing the risk of error and misappropriation. Examples of this include:

- The district does not have a process for analyzing the impact of benefits on payroll, or appropriately capturing administration errors;
- The district's purchasing process focuses on compliance with procedures rather than timely delivery of requested items;
- The district's contracting process lacks operational oversight from the development of the contract through its execution; and
- The inventory maintained by the technology department is not complete.

CISD has established procedures, but has not fully applied, communicated or monitored them. For example, procedures establish that travel reimbursements will be made only on original receipts. The procedure does not discuss the submission of original receipts in other purchases. Establishing and communicating effective control procedures has been hampered by the level of turnover in administration. The Finance Director should identify teachers and administrators willing to serve on a committee to review and update procedures for purchasing, asset management, and other processes that regularly affect staff or for which staff will be held accountable. The administrator responsible for the performance of control processes primarily performed within a single department should update those processes with input from staff. The internal control procedures should be included in the business procedures manual.

TRANSPORTATION POLICIES AND PROCEDURES

Recommendation: Establish a consolidated transportation policy and operations manual. Transportation operations at CISD are conducted in the absence of specific policy and procedure guidance for service expectations. Within CISD there is a very limited collection of policy and procedure documentation for transportation services. A limited statement of transportation eligibility is included in the student handbook along with a reference to the transportation policy and procedure manual to be distributed to parents of eligible students. Included in the student handbook are a

summary of behavior expectations and a limited statement regarding opportunities for alternate pickup and drop off points. No single manual or document was available that details which students are eligible for service; what areas within the district are considered hazards for purposes of transportation services; the maximum time students are to ride the bus; or the expectations of all parties in the event of an accident. These are among the most basic expectations of service provisions and must be clearly defined for any transportation department to be considered a high functioning organization. The absence of documentation has resulted in an operation that is wholly dependent on historical practices and individual personalities. This absence of documentation also exposes the operation to a number of potential issues, particularly in the event of an accident or incident. The recommended manual should focus on critical planning and operational parameters including:

- Clearly defining eligibility for services;
- Defining hazard areas throughout the district that would make otherwise ineligible students eligible for services;
- Establishing guidelines and a process for students to be picked up or dropped off from an alternate address;
- Defining expectations of all parties and the process to be followed in the event of an accident or incident on a bus; and
- Establishing processes to regularly record bus route information in a manner consistent with TEA requirements for the state transportation allotment.

RECRUITMENT AND RETENTION

Recommendation: Develop a comprehensive recruitment process that incorporates strategies for timely attracting employees with desired characteristics, provides for timely contact and follow up, and include post-hire programs that develop the desired skills and commitment in recruits. CISD does not have a recruitment and retention process that consistently attracts and develops teachers that can meet district expectations. CISD's teacher turnover is high with approximately 20 percent leaving the district in 2009–10. Particularly, a majority of this turnover is among teachers who had been with the district less than three years. This suggests a recruitment and retention process that does not clearly communicate expectations to recruiters or applicants; does not allow for the timely selection of applicants before the pool of preferred qualifications is

exhausted; or, does not address the needs of teachers after being hired. The CISD recruitment process does not take full advantage of the teacher recruitment season with activities typically not starting early enough to reach potential candidates aggressively seeking the best positions or to compete with districts aggressively seeking the best recruits.

The district's continual turnover and reorganization has left CISD with gaps in critical services, resulting in undesirable alternatives, such as the use of long-term substitutes in core teaching positions. To address these concerns, CISD should first identify the characteristics of the preferred teacher candidate, including the desired skills and values expected of successful teachers. Once the essential qualifications are identified, district job descriptions should be reviewed to ensure that minimum and preferred requirements are appropriately included and then posted on the district's website. Interview questions should be developed that help predict if a candidate fits the desired qualifications and the questionnaire provided to interviewers. Additionally, CISD should also evaluate the information gathered from the exit process so that long term retention is more likely. Finally, CISD should review its post-hire induction programs to determine if the district is providing the right mix of support and opportunities for district employees to succeed.

FOOD SERVICE FINANCIAL MANAGEMENT

Recommendation: Develop targeted standards for expenditures by category (food, labor, and non-food) as a percentage of revenue. CISD has not developed targeted standards for food, labor, and non-food expenditures as a percentage of revenue, or developed a system for routinely monitoring those expenditures to ensure that the Child Nutrition Program (CNP) fund remains within budgeted amounts and is fiscally sound. CISD was unable to provide accurate end-of-year financial information representing the food, labor, and non-food expenditures; and total revenue of the CNP for 2006–07 to 2009–10. Additionally, the Food Service Director does not receive accurate monthly revenue and expenditure reports from the Finance Department, and therefore could not develop profit and loss statements for individual schools.

The CISD Finance Director and Food Service Director should cooperatively monitor the revenue and expenditures of the CNP funds, otherwise the district risks losing the opportunity to take immediate corrective action when deficit spending is identified. In addition, the Finance Department should provide the Food Service Director with an accurate

monthly revenue and expenditures report itemized for each individual school.

GENERAL INFORMATION

- Cotulla ISD is located in La Salle County in the city of Cotulla, approximately 90 miles south of San Antonio and 65 miles north of Laredo, TX on Interstate 35. The city had a population of 3,603 in 2010.
- Recent discoveries of large shale oil reserves within La Salle County and south Texas in general have the strong possibility of raising the property wealth of the CISD to a point where it may be categorized “property wealthy” per the auspices of Texas Education Code Chapter 41.
- In school year 2009–10 the district had 1,191 students, with a student population of 93.1 percent Hispanic, 6.6 percent Anglo, 0.3 percent African American, and 85.1 percent economically disadvantaged.
- The superintendent is Ms. Elizabeth Saenz. She assumed leadership of the district in August 2005. Previously she was superintendent of Balmorhea ISD. As of June 2011, Ms. Saenz has accepted the position of superintendent with West Oso ISD.
- In school year 2009–10, CISD had 118.1 total staff, with 44.9 percent, or 53, being teachers.
- CISD received an Academically Acceptable rating for school year 2009–10 from the Texas Education Agency. During that school year, one campus received a Recognized rating and the remaining four received Academically Acceptable ratings.
- CISD is served by the Regional Education Service Center XX (Region 20) located in San Antonio.
- The legislators for the district are Senator Judith Zaffirini and Representative Tracy O. King.

SCHOOLS

- Encinal Elementary School (Pre-K–5)
- Ramirez Burks Elementary School (Pre-K–5)
- Newman Middle School (6–8)
- Cotulla High School (9–12)

FINANCIAL DATA

- Total actual expenditures (2009): \$26.1 million.
- Fund balance: 10.2 percent of 2009–10 total budgeted expenditures.
- Tax Rate (2009–10): \$1.492 (\$1.170 Maintenance and Operations and \$0.322 Interest and Sinking).
- In 2009–10 CISD’s Wealth per Student was \$339,950 with a Wealth per WADA of \$226,093.
- The percentage of total actual expenditures spent on instruction was 24.7 percent; total actual operating expenditures spent on instruction was 47.7 percent. The district’s per pupil actual operating expenditure (2009–10) was \$11,366.
- Instructional Expenditure Ratio (2009–10): 56.1 percent.

The chapters that follow begin with a summary of the district’s accomplishments, findings, and recommendations. Detailed explanations for accomplishments and recommendations follow the summary and include fiscal impacts. Each chapter concludes with a fiscal impact chart listing the chapter’s recommendations and associated savings or costs for 2011–12 to 2014–15.

The following table summarizes the fiscal impact of all 59 recommendations in the performance review.

FISCAL IMPACT

	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) SAVINGS	ONE TIME (COSTS) SAVINGS
Gross Savings	\$154,219	\$197,535	\$239,872	\$238,412	\$236,968	\$1,067,006	\$6,281
Gross Costs	(\$186,694)	(\$187,694)	(\$183,894)	(\$184,894)	(\$185,894)	(\$929,070)	(\$4,000)
TOTAL	(\$32,475)	\$9,841	\$55,978	\$53,518	\$51,074	\$137,936	\$2,281

CHAPTER 1

EDUCATIONAL SERVICE DELIVERY

COTULLA INDEPENDENT SCHOOL DISTRICT

CHAPTER 1. EDUCATIONAL SERVICE DELIVERY

Cotulla Independent School District (CISD) is located in La Salle County and serves the cities of Cotulla and Encinal and the community of Fowlerton. CISD has four schools. The district's educational management is overseen jointly by the superintendent and the Assistant Superintendent. Two instructional facilitator positions whose purpose is to support implementation of district educational strategies report directly to the Assistant Superintendent. The Director of Music/Cultural Arts, District Nurse, and Athletic Director each report to the superintendent. Each campus is managed by a Principal and Assistant Principal for the exception of Encinal Elementary which only has a principal.

Exhibit 1-1 shows individual campus and district enrollments over the past five years. The district has seen a slight decrease in total student enrollment since school year 2006–07. The district's ethnic distribution has remained relatively stable over the past four years with approximately 90 percent of the total student enrollment classified Hispanic. White students make up an overwhelming majority of the remaining 10 percent.

Exhibit 1-2 shows the accountability ratings for the school district and individual campuses for both the state and federal accountability systems. The instances where both the district and campuses failed to meet adequate yearly progress

EXHIBIT 1-1 STUDENT ENROLLMENT SCHOOL YEARS 2006–07 TO 2009–10 CAMPUSES AND DISTRICT

CAMPUS	SCHOOL YEAR				PERCENT CHANGE
	2006–07	2007–08	2008–09	2009–10	
Encinal Elementary	92	95	85	109	18%
Ramirez Burks Elementary	549	562	557	517	(6%)
Frank Newman Middle School	230	209	224	244	6%
Cotulla High School	319	294	330	308	(3%)
District	1,226	1,219	1,196	1,178	(4%)

SOURCE: AEIS, April 2011.

EXHIBIT 1-2 ACCOUNTABILITY RATINGS CAMPUSES AND DISTRICT SCHOOL YEARS 2006 TO 2010

CAMPUS	SCHOOL YEAR									
	2006		2007		2008		2009		2010	
	STATE	AYP	STATE	AYP	STATE	AYP	STATE	AYP	STATE	AYP
Encinal Elementary	R	Meets AYP	AA	Meets AYP	R	Meets AYP	R	Meets AYP	R	Meets AYP
Ramirez Burks Elementary	AA	Meets AYP	AA	Meets AYP	AA	Meets AYP	AA	Meets AYP	AA	Meets AYP
Frank Newman Middle School	AA	Meets AYP	AA	Meets AYP	AA	Missed AYP	AU	Meets AYP	AA	Meets AYP
Cotulla High School	AA	Missed AYP	AA	Missed AYP	AA	Missed AYP	AA	Missed AYP	AA	Meets AYP
District	AA	Meets AYP	AA	Meets AYP	AA	Missed AYP	AU	Missed AYP	AA	Meets AYP

*Indicates where the district or campus did not meet adequate yearly progress in Math.

SOURCE: AEIS, April 2011.

are mostly due to math performance, though the 2008 rating was due to both math and reading performance. The district received an Accredited Warned status for school year 2009–10 due in part to the district receiving an Academically Unacceptable rating in 2009.

While CISD has made some progress from 2008–09 to 2009–10, its Texas Assessment of Knowledge and Skills (TAKS) performance in 2009–10 remained below state performance averages in all grade levels and subject areas with the exception of Grade 8 social studies where its performance matched the state average (**Exhibit 1-3**). The differences between CISD and state performance averages were especially large in Grade 6 math (48 percentage points), Grade 9 math (40 percentage points), Grade 8 math (24 percentage points) and Grade 5 math (20 percentage points).

ACCOMPLISHMENTS

- CISD organized a comprehensive, professional staff development conference for all district staff at the beginning of the school year that offered a wide range of sessions to meet the needs of educators and support staff.
- CISD has made technology access a priority in the district which is reflected by the degree to which this technology is available throughout the district.
- The Federal Programs Director uses registration week to meet with parents and inform them in person and through brochures about instructional and support services available through Title I to students and how to access these services.

**EXHIBIT 1-3
PERCENTAGE OF CISD AND STATE STUDENTS TESTED
MEETING TAKS STANDARD BY SUB-TEST AND GRADE
2009–10**

PERCENTAGE OF CISD AND STATE STUDENTS TESTED MEETING TAKS STANDARD								
GRADE	DISTRICT/ STATE	READING	MATH	WRITING	ENGLISH LANGUAGE ARTS	SCIENCE	SOCIAL STUDIES	ALL TESTS
Grade 3*	CISD	88%	84%					82%
	State	92%	87%					84%
Grade 4*	CISD	67%	71%	77%				53%
	State	86%	89%	92%				79%
Grade 5	CISD	66%	66%			70%		51%
	State	86%	86%			88%		76%
Grade 6	CISD	66%	35%					31%
	State	86%	83%					77%
Grade 7	CISD	85%	75%	94%				69%
	State	86%	82%	95%				75%
Grade 8	CISD	78%	57%			75%	95%	47%
	State	91%	81%			78%	95%	70%
Grade 9	CISD	82%	32%					34%
	State	92%	72%					71%
Grade 10	CISD		58%		86%	62%	88%	48%
	State		75%		91%	75%	93%	66%
Grade 11	CISD		72%		86%	83%	92%	62%
	State		89%		93%	92%	98%	83%

*Only – English.

SOURCE: Texas Education Agency, AEIS, 2009–10.

FINDINGS

- CISD lacks a systematic process to evaluate the effectiveness of its instructional programs in meeting programmatic goals.
- CISD does not implement its curriculum consistently with considerable differences by grade level and content area.
- CISD does not have a Gifted and Talented (G/T) curriculum and G/T is not integrated into the district curriculum.
- CISD lacks an appropriate number of English as a Second Language certified teachers to fully support its Limited English Proficient (LEP) students in the high school.
- Cotulla High School's Career and Technical Education (CTE) program lacks assigned leadership and a process to evaluate if the program is meeting district expectations.
- CISD does not effectively prepare its students for Advanced Placement tests and college entrance exams.
- CISD lacks a comprehensive dropout reduction and high school completion program with detailed strategies outlined in the district and campus improvement plans.
- CISD lacks a staffing strategy to determine its number of certified librarians and aides.
- CISD lacks a strategy to ensure its library collection meets acceptable standards relating to collection size and age.

RECOMMENDATIONS

- **Recommendation 1: Develop and implement a program evaluation system to include a report to the school board.**
- **Recommendation 2: Conduct a needs assessment of its curriculum management system to determine the underlying causes behind the inconsistent implementation, develop an implementation manual based on this assessment, and institute a uniform lesson review system to monitor curriculum implementation.**

- **Recommendation 3: Conduct a comprehensive evaluation of its G/T program.**
- **Recommendation 4: Expand and increase the incentives it offers to teachers to obtain an ESL certification and publicize its change of incentive policy among high school teachers.**
- **Recommendation 5: Establish a CTE Department and an advisory committee to assist in evaluating the program at Cotulla High School.**
- **Recommendation 6: Request an AP Diagnostic review of the AP program from the College Board.**
- **Recommendation 7: Implement a comprehensive dropout reduction and high school completion program with multiple, inter-dependent strategies.**
- **Recommendation 8: Develop a librarian staffing strategy that enables each campus to have a fully staffed library.**
- **Recommendation 9: Develop a library collection strategy that enables each campus library to meet minimum acceptable standards both in terms of collection size and age.**

DETAILED ACCOMPLISHMENTS

COTULLA ISD MINI CONFERENCE

CISD organized a comprehensive, professional staff development conference for all district staff at the beginning of the school year that offered a wide range of sessions to meet the needs of educators and support staff.

The district organized the weeklong “Designing for the Future for the Next 100 Years – Engage. Enrich. Empower” mini conference for the 2010–2011 school year. The mini conference took place on August 16–20, 2010 shortly before the beginning of the school year. It included both district and outside presenters. The sessions during the first day targeted all staff and addressed issues such as: District Accountability, State of the District: Past, Present & Future; and Preventing Sexual Harassment. The mini-conference also devoted one day to address CISD's school reform approach with sessions for all staff. These included: Campus Core Beliefs, Campus Expectations, Educator Expectations, TECHspectsions, and Policies and Procedures.

The sessions in the subsequent days offered two tracks: one for support staff and the other for educators. The sessions for

support staff addressed mainly issues of safety and included topics such as: Identify Asbestos in the Workplace, Safety in the Workplace, Proper Use of Chemicals in the Workplace, and Use of Fire Extinguishers.

The educator track offered a wide range of curricular, classroom and student management sessions. The sessions were repeated several times allowing educators to attend multiple sessions. Educators were asked to select four to six sessions that best met their needs. Sessions offered are listed in **Exhibit 1-4**.

**EXHIBIT 1-4
EDUCATOR MINI CONFERENCE SESSIONS**

TOPIC	CONTENT
AWARE: Student Information	Eduphoria session on Teacher Data Analysis, Student Profile, and building teacher assessments.
English Language Professional Standards (ELPS) Math	ELPS strategies for all grade levels using a math activity that can be modified for all students.
ELPS Science	ELPS strategies for all grade levels using a science activity that can be modified for all students.
ELPS ELA	ELPS strategies for all grade levels using an ELA activity that can be modified for all students.
ELPS Social Studies	ELPS strategies for all grade levels using a Social Studies activity that can be modified for all students
411 on Drugs	Interactive session to increase awareness on drug and alcohol facing youth.
411 on Internet Safety	Overview of how teens communicate via social and video networking sites both positively and negatively.
ARD Process and Terminology	What teachers need to know about ARD and how to prepare for a meeting.
Sheltered Instruction Observation Protocol (SIOP)	Using sheltered instruction to improve instruction for ELL students.
State TAKS & Benchmark Testing	The Texas Student Assessment Program and CSCOPE Curriculum Based Assessments (CBAs).
Texas Performance Standards for GT Students	Information on the Texas Performance Standards project and how CISD will use it.
Did You Do Your Homework?	Understanding the background and traditions of your students.
Classroom Discipline	Levels of discipline and how teacher’s behavior helps maintain classroom discipline.
Characteristics of Dyslexia	Truth and myths about dyslexia.
CSI: Count on Success (Math)	How the Newman Math Department re-analyzed their data, teaching practices, and instructional Strategies.
ELL: Teaching Academic Vocabulary	Best practices and instructional strategies for ELLs using a systematic approach.
Response to Intervention (RTI)	Techniques and strategies to use with students who are struggling with the general curriculum.
Best Practices: Social Studies	Strategies to facilitate learning by disaggregating benchmark results to focus on student needs.
Fair Use and Copyrights: Educator Guidelines	Information on fair use and copyright of materials or media available for educational purposes.
Working on the Work (WOW)	WOW framework overview: being part of a learning organization and designing engaging academic work.
Student Services	Procedures and Accountability for attendance and textbooks.
Prevent Bullying in School	Programs and strategies that reduce or prevent bullying.
Science Confidential	Using CSCOPE to teach the Texas Essential Knowledge and Skills (TEKS). Classroom best practice strategies.
CSCOPE Curriculum Updates	New ELAR format and the updated documents for the new Science TEKS.
CISD Library Services	Media program services available to students and staff.

SOURCE: Cotulla ISD Educator Mini Conference Schedule of Events, August 17, 2010.

The conference also devoted a day to technology (**Exhibit 1-5**). The Technology Mini Conference offered sessions on eight topics of which teachers were asked to select four to attend.

CISD staff considered the mini conference effective. Out of 110 staff that responded to the evaluation, 96 or 87.3 percent indicated that the mini conference met their needs. Between 86 and 96 of the staff considered the conference “effective” or “very effective.” The educator and support staff sessions were rated “very effective” or “effective” by 96 percent of the staff; 64 percent rated these sessions “very effective.” The technology sessions were rated “very effective” or “effective” by 93 percent of the staff; 62 percent gave them a “very effective” rating.

TECHNOLOGY ACCESS

CISD has made technology access a priority in the district which is reflected by the degree to which this technology is available throughout the district.

CISD is a technology rich district. The technology each school has is presented in **Exhibit 1-6**.

According to a February 2011 survey of CISD administrators and teachers, 81.3 percent of the teachers and 85.8 percent of administrators are confident in the ability of district’s computers to apply new technology (**Exhibit 1-7**). More than 85 percent of CISD teachers and administrators are also confident in the ability of the district’s teachers to use technology in instruction.

Teachers use technology in all subject areas in a variety of ways. For example, an elementary Physical Education (PE) teacher uses a software program to show different exercises to the students. Teachers use technology to show CSCOPE handouts, link to science websites, use math online software, access health information, connect to Region 20 for distance learning sessions or obtain professional development.

MARKETING TITLE I SERVICES

The Federal Programs Director uses registration week to meet with parents and inform them in person and through brochures about instructional and support services available to students through Title I and how to access these services.

During registration week, the Federal Program Director sets up an information booth/table for parents as part of the registration procedures during the first week in August. This is an opportunity for the Federal Programs Director to meet and greet parents and explain supplemental instructional and tutorial programs and services available to the students under Title I.

Several brochures concerning Title I are distributed to parents during registration week. The Title I, Part One brochure describes the intent and purpose of Title I, Part A, specifies in which schools it is available, and lists the ten components of a Title I School-wide program. The brochure also lists the services provided through Title I, including: computer lab instructors, technology, instructional aides, instructional materials, training and staff development, instructional consultants, tutorials, a counselor, parent liaisons, and supplemental educational services for high

EXHIBIT 1-5 TECHNOLOGY MINI CONFERENCE SESSIONS

TOPIC	CONTENT
Basic Excel	New and enhanced features of Excel.
Teacher Web Page	New web tools 10 for creating and updating teacher web pages to meet district ad campus technology expectations.
Campus Broadcasting	Training on MediaCAST application including classroom usage of video on demand, live broadcasts, and the digital library.
Online Training	Online training packages available to all district employees, parents, students and community members.
SMART Boards in the Classroom	How SMART boards and Notebook software can improve classroom instruction through interactive lessons and engaging activities.
CISD Technology	CISD’s TECHspectations and new software programs, Technology TEKS K-12, teacher web guidelines, and AESOP – a substitute calling system.
Reading Assistant/Fast ForWord	Training on the use of the program that is designed to strengthen brain processing skills and increase reading proficiency in students of all ages.
Online Staff Development	Training on the use of PD 360, an on-demand library of professional development resources.

SOURCE: Cotulla ISD Designing the Future for the Next 100 Years, 2010–2011 School Year Brochure, August 19, 2010.

**EXHIBIT 1-6
CISD SCHOOL TECHNOLOGY**

SCHOOL	TECHNOLOGY
Encinal Elementary	Distance learning lab Lab with 20 computers Each classroom has a ceiling mounted projector Every classroom has five student laptops Four classrooms have an interactive whiteboard (Mimio Teach) Every classroom has a document camera Each teacher has a laptop
Ramirez Burks Elementary	Two 21-station computer labs: one lab is for grades 3 through 5 students and one for K-2nd grade students Distance learning lab for staff, students, and community All classrooms have a ceiling mounted projector Eight classrooms have an interactive whiteboard (Mmio Teach) Every classroom has a document camera Every classroom has five laptops Every classroom has one interactive smart table Each teacher has a laptop
Newman Middle School	Two 20-station computer labs A 12-station computer lab in the library A 13-station SMART lab Each teacher has a laptop All students have laptops (one on one) All teachers of core academic subjects have five laptops in their classrooms. All classrooms have a ceiling mounted projector Five classrooms have an interactive whiteboard (Mmio Teach) Each department has a document camera (6 in total)
Cotulla High School	Three 20-stations networked computer labs used for TAKS remediation Five mobile carts with 25 laps each used in the classroom One 13-station computer lab used as a SMART lab for broadcasting, robotics and laser engraving All classrooms have ceiling mounted projectors Five classrooms have interactive SMART boards Five document cameras, one per building Each teacher has a laptop As of 2010–11 all 9th grade students have laptops

SOURCE: Cotulla ISD Technology Plan, 2011–2012; Interview with CISD, Technology Director, February 7, 2011.

**EXHIBIT 1-7
CISD TEACHERS USE OF TECHNOLOGY**

RESPONDENTS	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
The ability of teachers to teach computer science and other technology-related courses.						
Teachers	4.2%	4.2%	35.4%	39.6%	10.4%	6.3%
Administrators	0.0%	0.0%	42.9%	14.3%	28.6%	14.3%
The age and condition of computers and their usefulness in applying new technology.						
Teachers	4.2%	14.6%	29.2%	31.3%	20.8%	0.0%
Administrators	0.0%	0.0%	28.6%	28.6%	28.6%	14.3%

*Survey respondents included 52 teachers and 8 administrators responded to the survey.

NOTE: Totals may not equal to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

school students. The brochure emphasizes the importance of parental involvement and lists a range of opportunities that are available for parents and families to get involved. Opportunities for parent involvement include joining a parent organization, becoming a mentor, assisting in school activities, and attending parent conferences. Opportunities for family involvement include becoming a member in a parent organization; attending school open house events, attending the Meet the Teacher night, and academic/TAKS night; and eating lunch at school with the child. District and campus contact information is also provided.

DETAILED FINDINGS

PROGRAM EVALUATION (REC. 1)

CISD lacks a systematic process to evaluate the effectiveness of its instructional programs in meeting programmatic goals.

Aside from analysis of student performance on benchmark tests and TAKS, and monitoring its bilingual/ESL and special education programs (evaluations that the district is required to conduct by the Texas Education Agency) based on its continuous improvement plans, the district does not perform evaluations of its instructional programs.

Interviews with CISD administrators indicated that evaluation criteria for district instructional programs as defined in the District and Campus Improvement Plans were previously used to determine program effectiveness. While these plans provide a holistic breakdown of the district and campus instructional strategies, the formative and summative evaluation criteria defined in them are very broad in scope and limited to a very small number of qualitative and quantitative measures.

Although the district is considering the establishment of an evaluation system through an Academic Committee composed of the Assistant Superintendent, three school board members, and representatives from each campus; it has not developed an evaluation framework, set evaluation criteria or determined its evaluation or data collection methodology. In instances where an evaluation of the program is listed within the program's plan, evaluation criteria are sometimes ambiguous or do not recommend the capturing of data or information that would serve to determine if the goal is being met. Finally, anecdotal evidence obtained through interviews and surveys indicate that the district may not be following through with evaluations set forth in program plans.

For example, the Gifted and Talented Program has a 2010–11 Program Improvement Plan that lists goals for the program and identifies activities and strategies to meet these goals. The plan lacks specificity on how the district will monitor whether this is implemented and evaluate how well this goal has been carried out. Furthermore, although both the Cotulla ISD Gifted and Talented Education Plan and the CISD 2010–2011 Gifted and Talented Program Improvement Plan indicate that the program will be evaluated annually through parent and student surveys, student assessment results and feedback from consultants and specialists, the program has not been evaluated.

Program evaluation is a key component of accountability and improvement in student performance. The primary reason for conducting program evaluations is to collect quantitative data and qualitative evidence that will help with making informed decisions about various programs. Knowing the extent to which a program is meeting its goals helps determine whether or not to continue the program, modify it, or terminate it. Evaluation is necessary for determining if a program meets the needs of all students as well as needs of specific student populations. Evaluation also demonstrates how well the program supports student achievement on district and state tests, helps identify program weaknesses, pinpoint needed changes and guide continuous program improvements. Without evaluation, districts are limited in their ability to determine if a program is meeting the specific goals for which the program was instituted. The lack of evaluation also limits districts in their ability to develop strategies for increasing program effectiveness. Districts develop evaluation guidelines and procedures early in the process to ensure that the evaluation conducted is comprehensive, and that it will use the evaluation results in planning, budget preparation, and improving program effectiveness.

Kerrville ISD identifies three programs per year for in-depth evaluation using a locally developed Program Evaluation Model. The seven-step model includes three phases: organization and design; information collection; and analysis and conclusion. It details in a step-wise manner all activities that the district has to perform and provides associated forms and examples. The superintendent, principals and respective program directors review the evaluation report and its recommendations.

Spring ISD uses consistent standards to determine the worth of its program and identify program strengths and weaknesses. Its *Spring ISD Standard Process for Program Evaluation*,

specifies the standards to be applied to all evaluations of its educational programs. The district implements two types of evaluations: evaluations designed to improve implementation of existing programs and evaluations designed to measure the merit of programs. Variables for program evaluation include degree of program implementation; student performance; quality of teacher preparation and development; teacher satisfaction; adequacy, quality and availability of resources; unintended effects; adequacy of staffing; adequacy of facilities and equipment; and student, parent and community satisfaction.

Galena Park ISD (GPISD) implements a systematic ongoing evaluation process and calendar that integrates with the district's program development cycle. GPISD evaluates one districtwide department or core area and one support service annually. The district uses the evaluation data to plan and revise all its educational programs over a five-year period. The system adopted from the National Curriculum Audit Center evaluates programs based on standards of control, direction, consistency/equity, assessment, and productivity. The evaluation starts with a needs assessment implemented by an external team, followed by stakeholder surveys. The evaluation report is organized by standard, including commendations and recommendations for each standard area, student and staff demographic data, and stakeholder survey results.

The CISD Assistant Superintendent, jointly with the Academic Committee, should develop and implement a program evaluation system to include a report to the school board. The system should have a calendar ensuring that the district evaluates all instructional and instructional support programs on a regular basis to determine their effectiveness. This calendar should have a three to five year horizon that indicates which programs will be evaluated each year, identifies when these evaluations will take place and ensures all significant programs receive an evaluation over that time period.

The evaluation should define the purpose and scope of the program, articulate the qualitative and quantitative measures to evaluate program effectiveness, specify the type of data to collect and methods of data collection, describe how to analyze the data, and outline the most significant contents of an evaluation report.

The evaluation system should include a follow-up report documenting whether the district has implemented the recommendations and how implementation has affected

student achievement. This evaluation report should include specific recommendations and associated action plans and should identify the staff responsible for implementing the plans.

Copies of the evaluation and follow-up reports should be provided to the board either individually or in a consolidated annual report.

This recommendation can be implemented with existing resources.

CURRICULUM (REC. 2)

CISD does not implement its curriculum consistently with considerable differences by grade level and content area.

CISD adopted the CSCOPE curriculum in school year 2008–09 and is in its third year of implementation. CSCOPE is a curriculum management system developed by the Texas Education Service Center Curriculum Collaborative (TESCCC). TESCCC describes CSCOPE as a “comprehensive, customized, user friendly curriculum support system” that is primarily focused on impacting “instructional practices in the classroom to improve student performance.” According to TESCCC, CSCOPE has the following features:

- It is a K–12 systemic model in the four core areas.
- It offers common language, structure and process for curriculum delivery.
- It is an aligned, written, taught, and tested curriculum.
- Has innovative technology.
- Clarifies and specifies TEKS and TAKS expectations assembled in a vertical alignment format.
- Has customizable instructional plans that allow district resources to be integrated into the system.
- Offers lessons in English and Spanish.

The CSCOPE components and instructional approach are presented in **Exhibit 1-8**. CSCOPE lessons suggest lesson duration; provide a lesson synopsis; list the TEKS and related TEKS; specify performance indicators; list guiding questions, vocabulary, materials for each day, and resources; suggest materials to prepare in advance; and apply the instructional procedures to the topic of the lesson.

Prior to the district selecting CSCOPE, CISD did not have a curriculum management system. Teachers used the TEKS,

**EXHIBIT 1-8
CSCOPE CURRICULUM COMPONENTS AND INSTRUCTIONAL PROCEDURES**

COMPONENTS	INSTRUCTIONAL PROCEDURES
<p>Vertical Alignment Documents: presents aligned standards among grade levels.</p> <p>Year at a Glance: presents a quick snapshot of the entire year's instructional plan.</p> <p>TEKS Verification Matrix: ensures that all state standards are fully accounted for in the CSCOPE curriculum.</p> <p>Instructional Focus Documents: logically groups the specified standards into coherent units of instruction.</p> <p>Performance Indicators: includes evidence of student attainment of and/or progression toward an identified standard.</p> <p>Unit Tests: assesses the specified student expectations as noted on the Instructional Focus Document.</p> <p>Exemplar Lessons: provides a comprehensive resource of exemplar instructional activities.</p> <p>Lesson Planner: is used to develop, share, and maintain plans for high quality instruction.</p>	<p>ENGAGE: In this stage the learner is engaged by teacher questions or a story about an unusual event.</p> <p>EXPLORE: In this stage, the student has the opportunity to work through the problem with hands-on experience; discuss the problem with other students; and receive minimal guidance from the instructor. This will help the student to become more familiar with the problem and to generate additional interest in solving the problem.</p> <p>EXPLAIN: During this stage, students begin to learn the terminology (definitions, explanations, and relationships) surrounding the material.</p> <p>ELABORATE: In this stage the students use what they have learned in order to solve the initial problem. They should also be able to use the concepts learned in the Explain stage to solve additional problems. The instructor listens for their understanding of the concepts and terminology but does not provide direct answers or introduce new material.</p> <p>EVALUATE: During this stage, instructors can assess their students' learning through a variety of assessments, including the student's self-assessment.</p>

SOURCE: CSCOPE, <http://www.cscope.us/curriculum.html>. March 2011.

worksheets and textbooks as their curriculum. According to district administrators, principals and teachers, each teacher was essentially responsible for his/her own curriculum and developing a scope and sequence. CSCOPE was initially piloted in 2007–08 in the middle school for science. At the end of that school year district administration recognized that the use of its curriculum management system did not meet expectations. In response, the decision was made to require its use.

Implementation of the curriculum varies across schools and subject areas. According to district administrators, implementation is highest at the elementary level and lowest at the high school level. Administrators associate the level of implementation to the extent of administrator and teacher stability in the school. Implementation at the high school is lowest; a campus that has been subject to multiple administrator changes and to a high rate of teacher turnover.

- **Elementary Campuses:** Use varies by grade and subject. CSCOPE does not offer a pre-k curriculum. It is used in kindergarten, first and second grades but not in all core subjects. It is not used in first grade reading; instead teachers use basal readers. Use also varies in Grades 3, 4, and 5 by subject area. Teachers in Grades 4 and 5 use textbooks for reading because they find the curriculum “too complicated,” they lack

the resources specified in CSCOPE, and consider the lessons “too paper intensive.” In Grade 4, teachers said math lessons do not match the assessments, are not consistent with the TEKS and do not offer enough repetition. Elementary school teachers find the curriculum use very time consuming and fault the curriculum management system for inaccurate estimations of time lessons take. The elementary school teachers use CSCOPE the most in science and like its hands-on approach, science web site and available resources. In social studies, teachers indicated that CSCOPE has gaps and needs to be supplemented. Overall, elementary school teachers conclude that the curriculum does not stand on its own. Teachers use it mainly as a supplementary tool.

- **Middle School Campus:** The CSCOPE math and science components are more developed, social studies is still being developed, and ELA is the least developed because the district requires ELA teachers, starting in 2010–11 to also use a new ELA software system. In 2008–09, Newman Middle School was Academically Unacceptable because of students' low performance in math and science. Teachers received a considerable amount of professional development in these two subject areas, leading to the development of

these components of CSCOPE. However, CSCOPE requires a lot of equipment and materials in science that the school does not have, thereby limiting its use. CSCOPE math curriculum is discovery based; teachers said that the curriculum has many gaps which have been filled with supplemental material. In the middle school, teachers use CSCOPE more as a framework or skeleton, supplementing it with other instructional programs; which increases teacher workload and their willingness to use it.

- **High School Campus:** Use varies by core subject area and across teachers. The curriculum is used most often in English and Social Studies. Teachers are allowed to make changes but they have to justify these changes and obtain department head approval. The principal then reviews the documentation and the teacher is provided time during professional development periods to make the necessary changes. Teachers indicated that the CSCOPE math component does not allow enough time for re-teaching, especially if students are one year or more behind. This creates a problem because Cotulla High School has a considerable group of students who are behind in math. CSCOPE is used as a framework and teachers have to supplement it where there are gaps or where it is not aligned with TEKS.

In its third year of implementation, teacher buy-in is still not complete. CISD teachers that were interviewed find it not user friendly, that the curriculum is not always consistent with the TEKS, and that assessments are not rigorous causing teachers to have to develop their own assessments or supplement the CSCOPE assessments. For example, because the science curriculum has not updated to reflect the new

standards before the start of the 2010–11 school year, it cannot be used this year. This has left science teachers without a curriculum.

Exacerbating the curriculum implementation concerns, CISD teachers at all grade levels indicated they did not have instructional materials and other CSCOPE specific resources and, therefore were not able to implement the CSCOPE lessons. This was blamed on district personnel changes in the Finance Department that contributed to a failure to respond in a timely fashion to principal and teacher requests for materials in the 2010–11 school year. CSCOPE implementation and use has also been hampered by the unavailability of the two instructional facilitators the district hired to support the teachers.

The need for a curriculum management system that is used districtwide and consistently by teachers is important, especially for a district like Cotulla with low academic performance. CISD had the lowest performance in TAKS reading, math, writing, and all tests among its peers from school year 2008–09 through 2009–10 (**Exhibit 1-9**) In 2008–09, Newman Middle School and the district were Academically Unacceptable because of low performance in math and science. While CISD has made some progress from 2008–09 to 2009–10, its TAKS performance in 2009–10 remained below state performance in all grade levels and subject areas with the exception of Grade 8 social studies where performance matched the state average

Diboll ISD, a district similar in size to Cotulla, implemented CSCOPE in 2007. Previously, the district, like Cotulla did not have a districtwide curriculum. One of the key steps in implementation was the adoption of a board policy that required CSCOPE implementation district wide. This sent a

EXHIBIT 1-9
2008–09 AND 2009–10 TAKS PASS RATES
READING, WRITING, MATHEMATICS, AND ALL TESTS
CISD, PEER DISTRICTS, REGION 20 AND STATE

SCHOOL YEAR	READING		MATH		WRITING		SCIENCE		SOCIAL STUDIES		ALL TESTS	
	08–09	09–10	08–09	09–10	08–09	09–10	08–09	09–10	08–09	09–10	08–09	09–10
Cotulla	80%	75%	64%	58%	84%	83%	72%	54%	91%	76%	55%	48%
Freer	82%	80%	72%	64%	85%	85%	64%	61%	84%	84%	59%	52%
Jim Hogg County	85%	83%	75%	76%	93%	90%	77%	63%	91%	83%	65%	61%
Quanah	87%	86%	65%	63%	91%	90%	72%	63%	91%	89%	60%	57%
Region 20	90%	88%	81%	78%	93%	92%	81%	76%	95%	93%	74%	70%
State	90%	88%	84%	80%	93%	92%	83%	78%	95%	93%	77%	72%

SOURCE: Texas Education Agency AEIS, 2009–10.

clear message to the staff and ensured them that they have the full support of the board behind CSCOPE. Diboll ISD also developed a manual for the staff to help with CSCOPE implementation. The *Curriculum, Assessment, and Instructional Design and Delivery Manual* contains a statement of the district's curriculum philosophy and curriculum mission statement; describes community expectations and proficiencies from its graduates; defines the written, taught, and tested curriculum; specifies the curriculum development and review cycle; defines roles and responsibilities of individuals assigned with curriculum development, review, delivery, and monitoring; presents a staff development plan that is aligned with curriculum goals; specifies a process for monitoring curriculum implementation; has a glossary of terms; and includes CSCOPE related board policies and regulations.

Implementation of a curriculum management system is more effective when there is high/complete teacher buy-in, when teachers have clear guidelines on what and how to implement, when needed resources are available, and when the curriculum management system is all encompassing and does not require teachers to identify and use additional sources to supplement or substitute what the curriculum management system offers. Effectiveness of implementation is also facilitated through district and school administrative actions such as a systematic review of teachers' lesson plans and consistent monitoring of classroom implementation.

CISD should conduct a needs assessment of its curriculum management system to determine the underlying causes behind the inconsistent implementation, develop an implementation manual based on this assessment, and institute a uniform lesson review system to monitor curriculum implementation.

This needs assessment should include an inventory of the various challenges and recurring problems that teachers have had with implementing the curriculum into their work. The scope of this needs assessment needs to be wide enough to capture issues that support curriculum, but which do not specifically concern the curriculum management system. This allows for the identifying of problems such as delays in acquiring CSCOPE materials. This will give district administrators a clearer picture of where the largest roadblocks to implementation reside and identify the underlying causes to these obstructions. This should include anonymous end user surveys to provide teachers with an opportunity to provide honest assessments of the curriculum management system.

Following this needs assessment, an implementation manual should be developed with strategies on how to implement CSCOPE in each grade level and content area. The manual, based on an evaluation of the status of CSCOPE implementation and the school district's expectation of its use, should clearly specify for each grade level and content area, whether and how CSCOPE should be used, what topics and areas are fully developed and which need to be developed or where development needs to be completed; and set a timeline for developing those topics/areas. Specific challenges and recurring problems that were identified in the needs assessment, along with examples of successful implementation by district teachers can be used to develop manual sections that focus on solutions to resolve the issues. This should include step-by-step examples of how to use CSCOPE as a tool for development of lesson plans.

This information will allow school administrators and teachers to direct their time and resources in an efficient manner and develop lesson plans for the identified topics/areas. Pairs of teachers can work on these lesson plans during their common daily conference time or during days allocated to staff development.

Finally, CISD should implement a rigorous lesson review system to ensure that the lessons teachers prepare are consistent with the CSCOPE instructional approach. CISD's Curriculum and Instruction Department should develop a uniform lesson review form with explicit review criteria incorporated into the form. CISD should also monitor lesson implementation using a consistent walkthrough approach and a feedback form. The monitoring system should require district and school administrators to conduct a set number of classroom walkthroughs. The Curriculum and Instruction Department should train district and school administrators in using the lesson review form and in monitoring/walkthrough procedures and feedback.

This recommendation can be implemented with existing resources.

GIFTED AND TALENTED (REC. 3)

CISD does not have a G/T curriculum and G/T is not integrated into the district curriculum.

At the elementary level, G/T trained teachers use differentiated instruction to serve G/T students. Differentiation is generally defined through three specific components: what is being taught, how it is being taught, and tangible results produced based on students' interests

and abilities. This strategy utilizes a unique approach to accommodate the needs of highly able learners.

At CISD, G/T students are placed in clusters and work with a G/T trained teacher. CISD was not able to provide evidence that exemplifies whether differentiation is implemented in the classroom, how rigorous it is, and how consistently and effectively it is implemented.

The district presents advanced learning opportunities at the secondary level by offering pre-AP, AP and dual credit courses. G/T students are expected to participate in these classes and take the associated exam.

Concerns about the implementation and effectiveness of the G/T program emerged in a February 2011 survey of CISD administrators, teachers, staff, students and parents that the review team conducted. As shown in **Exhibit 1-10**, one-half of CISD teachers who responded to the survey indicated that the G/T program needs to be improved in order to meet student needs. These concerns were also expressed by 44.4 percent of the parents, 42.9 percent of the administrators, and 35.8 percent of the students.

EXHIBIT 1-10
CISD PROGRAMS IN NEED OF IMPROVEMENT: GIFTED AND TALENTED*

CISD	PERCENT
Teachers	50.0%
Administrators	42.9%
Parents	44.4%
Students	35.8%

*Survey respondents included 52 teachers, 8 administrator, 46 parents, and 169 students responded to the survey.
SOURCE: School Performance Review Survey, February 2011.

Katy ISD has developed a G/T curriculum for all grade levels. The elementary G/T curriculum is developed around themes and concepts that enrich the core curriculum. Elementary G/T students participate in a program with a rigorous curriculum that seeks to develop their critical and creative thinking, problem solving, independent inquiry, research skills, and affective learning. At the secondary level, the pre-AP and AP classes have differentiated G/T curricula. The G/T curriculum is supplemented with programs such as Destination ImagiNation and a mentorship program matching G/T students with adult professionals.

CISD should conduct a comprehensive evaluation of its G/T program. As part of this evaluation, the district should

examine the extent to which teachers with G/T students differentiate the curriculum and assess the quality of their differentiation. In addition, the evaluation should explore how the district can create a continuous and rigorous G/T curriculum and integrate it into CSCOPE.

Finally, CISD should evaluate its G/T program monitoring procedures and set up an effective monitoring system. As part of this process, CISD should communicate with the Texas Education Service Center Curriculum Collaborative to identify districts that have developed and integrated their G/T curriculum into CSCOPE. CISD should contact these districts, review their G/T curriculum and determine whether they want to adopt it.

BILINGUAL/ESL (REC. 4)

CISD lacks an appropriate number of ESL certified teachers to fully support its Limited English Proficiency (LEP) students in the high school. This contributes to the district’s challenges in meeting the academic needs of its LEP population.

In 2009–10, CISD had 102 LEP students. Of these, 100 LEP students participated in the district’s bilingual/ESL program. CISD has the second highest percentage of bilingual/ESL students among its peers. Its percentage is lower than regional and state averages (**Exhibit 1-11**).

The percentage of its budget that CISD allocated to bilingual/ESL education was lower than regional and statewide rates (**Exhibit 1-12**). In comparison to Region 20 and the state, CISD spent 25 percent per student of what Region 20 spent and 18 percent of what the state spent on average per bilingual/ESL student. Jim Hogg County ISD, a peer district with a bilingual/ESL student population twice CISD’s, spent 2.5 times per student than CISD.

CISD had 13 LEP high school students in 2009–10 in the ESL program and 14 students in 2010–11. CISD’s LEP students’ performance on the TAKS was poor. In its 2008, 2009, and 2010 Performance-Based Monitoring Analysis System reports, TEA cited the district (level 3) for the poor performance of LEP students on TAKS. For example, in 2009–10, only 14 percent of LEP high school students passed TAKS reading/ELA, 38 percent passed TAKS math, 40 percent passed TAKS science and less than 1 percent passed all TAKS tests. With a heavy emphasis on improving the academic performance of LEP students in CISD, as articulated in both the district’s 2010–11 Bilingual Education/ESL Continuous Improvement Plan and Program

EXHIBIT 1-11
BILINGUAL/ESL TEACHER TO STUDENT RATIO
CISD, PEER DISTRICTS, REGION 20 AND STATE
2009–10

DISTRICT	STUDENTS ENROLLED IN BILINGUAL/ESL	PERCENT OF TOTAL ENROLLMENT	BILINGUAL/ESL TEACHERS	PERCENT OF BILINGUAL/ESL TEACHERS TO TOTAL TEACHERS	STUDENT TO TEACHER RATIO
Quanah	6	1.1%	0.0	0.0%	*
Freer	29	3.5%	3.0	4.4%	9.7:1
Cotulla	100	8.5%	0.0	0.0%	*
Jim Hogg County	197	17.4%	6.0	7.1%	32.8:1
Region 20	39,677	10.0%	1,690.5	6.5%	23.5:1
State	778,806	16.1%	23,412.4	7.0%	33.3:1

*District does not have any bilingual/ESL teachers.
 SOURCE: Texas Education Agency, AEIS, 2009–10.

EXHIBIT 1-12
BILINGUAL/ESL PER STUDENT EXPENDITURE
CISD, PEER DISTRICTS, REGION 20 AND STATE
2009–10

DISTRICT	STUDENTS ENROLLED IN BILINGUAL/ ESL	PERCENT OF TOTAL ENROLLMENT	BUDGETED EXPENDITURES*	PERCENT OF BUDGETED EXPENDITURES	PER STUDENT EXPENDITURES
Quanah	6	1.1%	\$3,379	0.1%	\$6
Freer	29	3.5%	\$9,913	0.1%	\$12
Cotulla	100	8.5%	\$58,452	0.6%	\$49
Jim Hogg County	197	17.4%	\$135,999	1.6%	\$121
Region 20	39,677	10.0%	\$75,234,899	3.0%	\$195
State	778,806	16.1%	\$1,295,663,024	4.2%	\$274

*Bilingual/ESL Education expenditures from "All Funds."
 SOURCE: Texas Education Agency, AEIS, 2009–10.

Improvement Plan, having high school ESL certified teachers is critical.

Although **Exhibit 1-11** shows that CISD did not have any bilingual/ESL teachers in 2009–10, the district had 28 teachers with bilingual or ESL certifications. Eight of these teachers had both bilingual and ESL certifications, and 13 had ESL certifications only. In 2010–11, CISD has 40 teachers with bilingual or ESL certifications: 27 of those have an ESL certification. In 2010–11, the district assigned two teachers to the high school. One teacher has an ESL grades 8–12 certification but the second teacher is a "bilingual generalist" who is certified to teach Early Childhood to Grade 4. The teacher who is a "bilingual generalist" pulls out ESL students for one class a day.

While the district has encouraged teachers to get ESL certifications and reimburses teachers for costs of the test, its efforts have not been effective with its high school teachers.

In its Bilingual Education/ESL Monitoring System 2010–2011 Continuous Improvement Plan, CISD indicates that as part of its goal to "continue ESL training and certification implementation; all campuses have met criteria with the exception of Cotulla High School."

La Vega ISD (LVISD) was successful in increasing the number of its ESL certified teachers by offering multiple incentives. To motivate teachers across all grade levels to become ESL certified, LVISD offers a 4-day free ESL academy in the summer. As an incentive the district reimburses the test fees for each teacher who passed the TExES ESL examination. La Vega Junior High also offers additional incentives to its science and social studies teachers to become ESL certified. The district encourages special education teachers to get ESL certifications. Two of its ESL certified teachers are special education teachers: one is at the primary school and one teaches at the high school. The

LVISD number of ESL certified teachers quadrupled from 2006–07 to 2009–10 from 13 to 58.

CISD should expand and increase the incentives it offers to teachers to obtain an ESL certification and publicize its change of incentive policy among high school teachers. This includes determining what type of incentives would motivate these teachers to get an ESL certification. In 2010–11, CISD offers a relatively small stipend of \$750 for teachers who are ESL certified and who have ESL students. In comparison, the district offers a \$1,250 stipend to teachers who have a bilingual certification and teach ESL students and a \$2,500 stipend to teachers with a bilingual education certification who also have a dual language teaching assignment. CISD should increase its ESL stipend, especially for high school teachers, to match the bilingual certification stipend for those teaching ESL students.

CISD should encourage two high school teachers a year to get their ESL certification. Added cost to CISD is \$1,000 a year in increased stipend for two teachers, assuming that the new stipend will be \$1,250 per teacher instead of \$750, an increase of \$500. If the district were to have two additional high school teachers obtain ESL certifications per year, then the total added stipend cost over a 5-year period would be \$15,000.

CAREER AND TECHNICAL EDUCATION (REC. 5)

Cotulla High School's Career and Technical Education (CTE) program lacks assigned leadership and a process to evaluate if the program is meeting district expectations.

CISD's CTE program consists of courses offered at both Newman Middle School and Cotulla High School. It includes a Tech Prep component, CTE courses that provide enrolled students with opportunities to obtain postsecondary credit held in escrow at a community or technical college. Previously, an Assistant Superintendent acted as the CTE coordinator, but this Assistant Superintendent left the district at the beginning of 2010 and the CTE coordinator responsibilities were not reassigned to a different position.

The Cotulla High School Campus Improvement Plan for 2010–2012 addresses CTE only once with regard to conducting a "self-evaluation for congruence with the regular curriculum" in association with Goal 2: "Cotulla ISD will continue to close the achievement gap between minority, special education, economically disadvantaged, limited English proficient, at-risk, and other students." The Cotulla High School Campus Improvement Plan specifies a single

evaluation criterion: repeated enrollments in sequential courses. The plan has not been updated, its evaluation criteria have not been expanded and it still identifies the person in charge of the CTE program self-evaluation as the Assistant Superintendent/CTE coordinator, a non-existent position.

Cotulla High School broadened its CTE Program in 2009–10 adding courses and teachers. Before 2009–10, the CTE program had one Agriculture teacher and one Business teacher. The Cotulla High School principal, who came to the district in 2009 and was previously a CTE teacher, hired three teachers and expanded the course offerings to Business Image Management and Multimedia (BIMM), Business Computer Information Systems (BCIS), and Architecture and Construction in addition to Agriculture, Food, and Natural Resources. All CTE teachers are certified and highly qualified.

The CTE program was expanded, according to the high school principal, as part of a broader strategy to reduce the district's dropout rate and engage students who do not consider going to college. In 2009–10, 76.3 percent of Cotulla High School students and 42.2 percent of Newman Middle School students were enrolled in CTE. When compared to total districtwide enrollment, 338 or 28.7 percent of CISD students were enrolled in CTE programs in 2009–10, a larger percentage than two of CISD's peer districts and above the regional and state rates.

The priority CISD places on its CTE program is reflected in the budgeted expenditures directed to the program. CISD had the lowest CTE budget as a percent of total budget among its peers; its CTE budget was also below the region and state rates. CISD's per student expenditures for CTE were the lowest among its peers and below the regional and state rates (**Exhibit 1-13**).

The CISD CTE program starts in grades 7 and 8 with a yearlong Smart Lab class, allowing middle school students to explore different aspects of technology. **Exhibit 1-14** lists the CTE classes CISD offered in 2010–11 along with student enrollment numbers per course. The CTE courses with the highest enrollment include BIMM, Principles of Agriculture, Architectural Design, and Animation. Cotulla High School CTE students participate in Future Farmers of America (FFA), the only CTE student organization on campus.

Cotulla ISD maintains four articulation agreements with Southwest Texas Junior College as part of its Tech Prep program. These four agreements are for the following programs:

EXHIBIT 1-13
CTE STUDENT ENROLLMENT AND BUDGETED EXPENDITURES
CISD, PEER DISTRICTS, REGION 20 AND STATE
2009–10

DISTRICT	NUMBER OF STUDENTS IN CTE	PERCENT ENROLLED IN CTE	BUDGETED CTE EXPENDITURES*	PERCENT BUDGETED CTE EXPENDITURES	PER STUDENT EXPENDITURES
Jim Hogg County	224	19.8%	\$413,807	4.7%	\$367
Freer	231	27.5%	\$309,653	4.0%	\$376
Quanah	240	43.3%	\$405,963	6.8%	\$730
Cotulla	338	28.7%	\$217,838	2.4%	\$182
Region 20	83,545	21.2%	\$79,372,200	3.2%	\$206
State	1,025,940	21.3%	\$1,009,165,942	3.3%	\$213

*Includes all funds.

SOURCE: Texas Education Agency, AEIS, 2009–10.

EXHIBIT 1-14
COTULLA HIGH SCHOOL CTE COURSES
BY ENROLLMENT
2011

CTE COURSE	TOTAL NUMBER OF COURSES OFFERED	COURSE ENROLLMENT
Business Image Management and Multimedia (BIMM) – 3 sections	3	46
BIMM II	1	7
Digital Graphics Media	1	13
Business Support Systems – A	2	5
Business Support Systems – B	1	*
Animation – 2 sections	1	20
Audio/Video Production	1	13
Digital Graphics	1	16
Web Mastering	1	15
Wildlife Management	1	12
AG Mechanics & Metal	2	20
Professional Standards in Agribusiness	1	12
Principles of Agriculture	2	35
Advanced Animal Science	1	16
Architectural Design	3	34
Principles of Architecture & Construction	1	15
Mill & Cabinet	1	10
Construction Management	1	8

*Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34 CFR Part 99 and Texas Education Agency procedures OP 10-03.

SOURCE: Cotulla High School, Schedule of Classes, Semester 2, 2011.

- Agribusiness Management
- Computer Information Systems
- Management
- Office Systems Technology

Exhibit 1-15 shows that CISD has the fewest total number of articulation agreements when compared to its peers. Conversely, CISD had the highest total number of Tech Prep students with 35 students classified as Tech Prep for school year 2009–10.

**EXHIBIT 1-15
CISD TECH PREP ENROLLMENT AND ARTICULATION AGREEMENTS
2009–10**

SCHOOL DISTRICT	TOTAL TECH PREP ENROLLMENT 2009–10	NUMBER OF ARTICULATION AGREEMENTS	PARTICIPATING COLLEGES
Jim Hogg County	0	8	Laredo Community College
Freer	14	17	Del Mar College Coastal Bend College
Quanah	0	5	Vernon College
Cotulla	35	4	Southwest Texas Junior College

SOURCE: Tech Prep of Texas, 2011.

One-half of the teachers who responded to the review team survey indicated that the CISD CTE program needs to be improved in order to meet student needs (**Exhibit 1-16**). The need for improving the CTE program was also echoed by 41.2 percent of the professional staff, 33.3 percent of the administrators, 29.5 percent of the parents and 25.9 percent of students who took part in the survey.

Most of the teachers, professional staff, parents and students did not consider CISD’s CTE program to be highly effective in meeting student needs (**Exhibit 1-17**). Only 14.3 percent of the teachers and administrators who responded to the

survey and 16.7 percent of the professional staff rated the CTE program as good or excellent. Nearly 30 percent of the teachers and professional staff who responded to the survey consider the program poor or below average.

An advisory committee is an integral part of a CTE program. Such a committee is particularly important when the program does not have a coordinator to oversee it. Typically, a CTE advisory committee consists of academic and CTE teachers, school and district administrators, career and academic counselors, staff, parents, and members of the business community and industry. The purpose of business and industry participation is to help the district assess local industry and business needs, assist in establishing proficiency standards for students, evaluate the adequacy of CTE facilities and programs, promote school-to-career connecting activities, and provide encouragement to students seeking jobs and training. The CISD Campus Improvement Committee, a committee that assists the high school principal and had input into the CTE program, cannot substitute for a CTE advisory committee because it lacks the needed respective business and industry expertise.

One of the key roles of the CTE Advisory Committee is to participate in the annual evaluation of the CTE program. The evaluation should address areas such as the administrative leadership of the CTE program; its Tech Prep program;

**EXHIBIT 1-16
CISD PROGRAMS IN NEED OF IMPROVEMENT: CAREER AND TECHNICAL EDUCATION***

CISD	PERCENT
Teachers	50.0%
Administrators	33.3%
Professional staff	41.2%
Parents	29.5%
Students	25.9%

*Survey respondents included 52 teachers, 8 administrators, 19 professional staff, 46 parents, and 169 students responded to the survey.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

**EXHIBIT 1-17
CISD EFFECTIVENESS IN MEETING THE NEEDS OF THE WORK-BOUND STUDENT***

RESPONDENTS	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
Teachers	8.2%	28.6%	38.8%	14.3%	0.0%	10.2%
Administrators	0.0%	14.3%	71.4%	0.0%	14.3%	0.0%
Professional staff	11.1%	16.7%	44.4%	16.7%	0.0%	11.1%
Parents	8.9%	22.2%	26.7%	20.0%	4.4%	17.8%
Students	8.9%	15.5%	41.7%	14.3%	4.2%	15.5%

*Survey respondents included 52 teachers, 8 administrators, 19 professional staff, 46 parents, and 169 students responded to the survey.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

integration of special populations in the program; student recruitment, selection, and enrollment procedures; occupational competencies; curriculum; instructional objectives; facilities and equipment; instructional materials and resources; opportunities for employment; linkages with post-secondary institutions; fiscal management, and accountability. The results of the evaluation lead to program improvement recommendations.

Districts that utilize CTE advisory committees typically hold committee meetings several times a year, usually quarterly. In addition to participation in the annual evaluation, responsibilities of the committee include: review of program progress, addressing program issues as necessary, assisting the CTE program through the formation and expansion of business and industry partnerships, and supporting the students through internships and scholarships.

Kerrville ISD has a 35 member CTE Advisory Board composed of community members, business leaders, and parents. The board meets monthly and provides input into the program. The board divided into two-member teams for the evaluation. All members were trained on using the evaluation instrument, tailored after the TEA instrument and covered each CTE course. The board plans to evaluate the CTE program annually.

The Spring ISD CTE Advisory Board advises the district on its long- and short-term CTE plan, current job needs, and the relevance of the CTE courses the district offers. It provides a forum for recommending equipment and training so that the CTE program can meet its goals, and encourages students through scholarships to continue their education and preparation for a career beyond high school. The board also enhances the community's support for career and technology education.

Cotulla High School should establish a CTE Department and an advisory committee to assist in evaluating the program. The district should assign one of the CTE teachers to act as a department head. An estimated annual stipend for these responsibilities based on a review of CISD's existing extra-duty stipends would be \$3,000 annually. The school should also establish a CTE advisory committee with representatives from local business and industry. The CTE advisory committee should meet at least once per semester and should be involved in an annual evaluation of its program. This evaluation should serve as a base for development of specific strategies and activities related to

CTE for inclusion in Cotulla High School's Campus Improvement Plan.

This evaluation should, at a minimum, include school district performance targets for each of the Perkins Core Indicators that use state performance levels as a benchmark since these are required program evaluation measures that are reported to the Texas Education Agency. The district could also consider including the following measures:

- The alignment of CTE course offerings to local, regional, and state labor market demand.
- The number of CTE and Tech Prep students that enter into postsecondary education in the fall after their graduation and to which institutions these students enroll.
- The postsecondary performance of former CTE students.
- A survey of what types of CTE courses that CISD students may have some interest that the district could consider offering in the future.

Finally, the district should also consider increasing the number of articulation agreements it has with nearby community colleges. Southwest Texas Junior College, with whom CISD already has an existing relationship, has agreements with other area school districts in three additional program areas: automotive technology, child development, and law enforcement. Laredo Community College has agreements with school districts in 14 program areas, many of which relate to CTE courses offered at Cotulla High School. Assistance with forming these relationships can be obtained through contacting either the STAR or South Texas Tech Prep Consortia depending on which college the district has interest.

ADVANCED PLACEMENT AND COLLEGE ENTRANCE EXAMS (REC. 6)

CISD does not effectively prepare its students for Advanced Placement (AP) tests and college entrance exams.

ADVANCED PLACEMENT

The AP program provides college-level courses to high school students to ease their transition to college. According to the College Board, the organization that manages the Scholastic Aptitude Test (SAT) and the AP program, the number of advanced courses that students complete is one of the best predictors of success on the SAT and in college. Participation in Advanced Placement courses benefits students by exposing

them to college-level academic content and challenging them to complete more rigorous coursework. Students with qualifying examination scores can also earn college credit. Even without taking the exams, students who take AP courses often receive more favorable consideration in the college admission process.

CISD offers pre-AP classes in its middle school and offers both pre-AP and AP classes in its high school. In middle school, CISD offers pre-AP classes in the core subjects in 6th, 7th and 8th grades.

In high school CISD offers pre-AP classes in English 1 and English 2. It offers English 3 AP and English 4 AP, Spanish 3 AP, Chemistry AP, AP Physics, and Biology AP. CISD students also took dual credit courses in U.S. government, U.S. History, English 3, and English 4 through distance learning from Southwest Texas Junior College.

CISD’s AP enrollment policy requires students who want to take an AP class have to have a “score of 2200 or better on the appropriate TAKS test. Students with lower scores may apply through an AP review committee.” CISD increased the percentage of students completing advanced placement (AP)/dual credit courses from 2004–05 to 2008–09 (**Exhibit 1-18**). However, the percentage of CISD students that completed these courses has remained below regional and state rates since 2004–05.

CISD requires students who take an AP class for two semesters to take the AP exams. **Exhibit 1-19** shows that the percentage of CISD students taking AP course exams increased substantially after the 2004–05 school year and has since remained relatively stable at approximately 17.5 percent. The percentage of students taking AP exams

followed similar participation trends and has remained stable at around 16 percent.

No CISD student who took AP exams in 2006–07, 2007–08, and 2008–09 had scores that exceeded the criterion (a score of 3 or higher). In comparison, more than 40 percent of Region 20 students and more than 50 percent of students statewide who took AP exams in 2006–07, 2007–08, and 2008–09 had scores exceeding criterion. Similarly, more than 36 percent of the AP scores in 2006–07, 2007–08, and 2008–09 in Region 20 and more than 46 percent of AP scores statewide in 2006–07, 2007–08, and 2008–09 exceeded criterion.

About 30 percent of CISD teachers and students reported that the district’s advanced placement program needs to be improved in order to serve its students better (**Exhibit 1-20**).

COLLEGE ENTRANCE EXAMS

CISD student’s performance on another key college readiness indicator: performance on the ACT/SAT, showed similar characteristics to their AP exam performance. Despite High School Campus Improvement Plan strategies that indicate SAT/ACT preparation classes were scheduled to be held in the fall, interviews with CISD staff said the district did not offer any college entrance exam preparation classes. Staff also mentioned the district does not train its teachers on how to prepare students for the exams.

While CISD students in the Class of 2009 had the highest participation rate in SAT/ACT among its peers and above regional and statewide rates, only 2.3 percent of the students met SAT/ACT performance criteria. CISD mean ACT and SAT scores were below the scores students as compared to its peer districts as well as below regional and statewide scores.

**EXHIBIT 1-18
PERCENT OF STUDENTS COMPLETING
AP AND DUAL ENROLLMENT COURSES
CISD AND PEER DISTRICTS
2004–05 TO 2008–09**

	2004–05	2005–06	2006–07	2007–08	2008–09
Cotulla	6.7%	11.9%	17.5%	17.7%	17.3%
Freer	17.6%	18.3%	16.0%	17.6%	15.5%
Jim Hogg County	17.9%	21.9%	19.2%	16.2%	16.4%
Quanah	20.7%	20.9%	23.6%	16.7%	11.5%
Region 20	20.1%	20.5%	21.4%	23.0%	24.4%
State Average	20.5%	21.0%	22.1%	23.1%	24.6%

SOURCE: Texas Education Agency, AEIS, 2004–05 through 2008–09.

EXHIBIT 1-19
CISD, REGION 20 AND STATE PERFORMANCE ON
ADVANCED PLACEMENT EXAMINATIONS
2004–05 TO 2008–09

	2004–05	2005–06	2006–07	2007–08	2008–09
Percent Taking AP Exams					
Cotulla	12.2%	23.5%	15.7%	16.7%	15.5%
Region 20	18.6%	19.5%	22.5%	24.6%	25.5%
State	18.4%	18.9%	20.0%	20.9%	21.2%
Percent of All AP Scores Exceeding Criterion					
Cotulla	11.8%	3.1%	0.0%	0.0%	0.0%
Region 20	37.7%	39.5%	36.6%	35.8%	38.4%
State	47.4%	47.2%	46.8%	46.0%	47.4%
Percent of AP Examinees with Scores Exceeding Criterion					
Cotulla	11.8%	3.1%	0.0%	0.0%	0.0%
Region 20	42.7%	44.4%	40.1%	40.4%	42.5%
State	51.8%	51.3%	50.5%	50.1%	51.2%

SOURCE: Texas Education Agency, AEIS, 2004–05 through 2008–09.

EXHIBIT 1-20
CISD PROGRAMS IN NEED OF IMPROVEMENT: ADVANCED
PLACEMENT*

CISD	PERCENT
Teachers	30.4%
Administrators	14.3%
Professional staff	16.7%
Parents	17.8%
Students	28.5%

*Survey respondents included 52 teachers, 8 administrators, 19 professional staff, 46 parents, and 169 students responded to the survey.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

CISD's ACT scores were the lowest among its peers and more than four percentage points lower than the regional and state average scores. CISD's SAT scores were 68 points lower than the regional score and 94 points lower than the average statewide score (**Exhibit 1-21**).

While the rate of CISD student participation in ACT/SAT exams from 2004–05 to 2008–09 exceeded the regional and state rates, the performance of its students was below Region 20 and statewide averages in all these years (**Exhibit 1-22**). CISD student participation in SAT/ACT varied from 2004–05 to 2008–09. It was the highest in 2007–08 at 76.5 percent and decreased in 2008–09 to 70.5 percent. The percentage of SAT scores exceeding criterion was highest in 2005–06 and decreased in subsequent years; it was the lowest

EXHIBIT 1-21
PERCENT OF STUDENTS TAKING ACT/SAT EXAMS, MEETING CRITERIA, AND MEAN ACT/SAT SCORES
CLASS OF 2009

DISTRICT	STUDENTS TAKING SAT/ACT EXAMS	STUDENTS MEETING SAT/ACT CRITERIA	MEAN ACT SCORE	MEAN SAT SCORE
Freer	76.9%	16.7%	18.1	-
Cotulla	70.5%	2.3%	16.0	891
Quanah	69.2%	11.1%	16.4	-
Jim Hogg County	**	4.3%	16.5	*
Region 20	61.0%	24.0%	20.2	959
State	61.5%	26.9%	20.5	985

**AEIS report used a "?"

SOURCE: Texas Education Agency, AEIS Report, 2009–10.

EXHIBIT 1-22
CISD, REGION 20 AND STATE PERFORMANCE ON SAT/ACT EXAMINATIONS
CLASS OF 2005 THROUGH CLASS OF 2009

	CLASS OF 2005	CLASS OF 2006	CLASS OF 2007	CLASS OF 2008	CLASS OF 2009
Percent Taking SAT Exams					
Cotulla	63.5%	44.9%	57.1%	76.5%	70.5%
Region 20	62.9%	63.3%	67.1%	65.4%	61.0%
State	65.5%	65.8%	68.2%	65.0%	61.5%
Percent of All SAT Scores Exceeding Criterion					
Cotulla	2.5%	16.1%	11.1%	5.1%	2.3%
Region 20	23.3%	23.6%	22.6%	23.8%	24.0%
State	27.4%	27.1%	27.0%	27.2%	26.9%
Mean SAT Score					
Cotulla	*	952	*	890	891
Region 20	957	965	958	956	959
State	992	991	992	987	985
Mean ACT Score					
Cotulla	17.1	18.7	17.9	17.1	16.0
Region 20	19.6	19.9	19.8	20.1	20.2
State	20.0	20.1	20.2	20.5	20.5

*Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34 CFR Part 99 and Texas Education Agency procedures OP 10-03.

SOURCE: Texas Education Agency, AEIS, 2004–05 through 2009–10.

in 2008–09 at 2.3 percent. CISD mean ACT and SAT scores also decreased in 2008–09 from 2005–06.

Despite the continual poor performance of Cotulla students on such college readiness benchmarks as the SAT/ACT and AP exams, the district improvement plan lacks any strategy or activity within its first goal that focuses on having students master academic rigorous academic standards to prepare them for higher education and postsecondary experiences. The plan does not list any activities or strategies that particularly focus on college readiness. This is a concern

given the length of time that student performance on these exams has been well below regional and state averages.

The SAT/ACT and AP exams fall under general college readiness strategies employed by school districts. The school review survey asked respondents to rate the extent to which the district meets the needs of the college-bound student (**Exhibit 1-23**). More than 44 percent of the professional staff rated the preparation of the district's college bound students as "poor" or "below average" and only 16.7 percent gave it a "good." Thirty percent of the teachers, 25.1 percent of the parents, and 22.5 percent of the students also rated the

EXHIBIT 1-23
EXTENT TO WHICH CISD MEETS NEEDS OF COLLEGE-BOUND STUDENTS*

	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
Teachers	2.0%	28.0%	28.0%	28.0%	6.0%	8.0%
Administrators	0.0%	14.3%	42.9%	28.6%	14.3%	0.0%
Professional staff	22.2%	22.2%	33.3%	16.7%	0.0%	5.6%
Parents	8.7%	17.4%	37.0%	15.2%	8.7%	13.0%
Students	7.7%	14.8%	34.9%	20.7%	6.5%	15.4%

*Survey respondents included 52 teachers, 8 administrators, 19 professional staff, 46 parents, and 169 students responded to the survey.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

preparation of CISD's college bound students to be "poor" or "below average."

Districts with high participation in AP courses and exams and high performance on AP and college entrance exams integrate their AP program into their curriculum by preparing students academically to take rigorous and advanced courses before they reach high school. These districts set participation goals and offer multiple pre-AP courses starting in middle school. They offer training to AP and regular education teachers in test-taking strategies. Districts also offer tutorials on test-taking strategies and provide access to computer labs equipped with applicable software.

The W.T. White High School in Dallas ISD, a school with 2,250 students in 2010–11, had the highest TAKS scores of any comprehensive high school in Dallas ISD. W.T. White High School has an 86.2 percent minority student population. It enrolls 67 percent of its students in pre-AP and AP programs. The school offers a wide range of advanced placement classes and athletic and academic extra-curricular programs such as debate, Academic Decathlon, Whiz Kid, art, chess, and drama activities. W.T. White High School was one of three schools in the U.S. to win the 2003 College Board AP Inspiration Award for exemplary work in improving the academic environment and helping economically disadvantaged students go to college. More than 80 percent of its graduates attend four-year colleges and 11 percent attend two-year colleges. The school receives millions in scholarship awards annually and students get accepted to a large number of colleges. The school has an experienced and highly qualified cadre of teachers with low turnover: 75 percent of the teachers have master's degrees. Teachers have on average 15 years experience.

CISD should request an AP Diagnostic review of its AP program from the College Board. According to the College Board, this two-day diagnostic involves a comprehensive review of a district's AP program conducted by College Board staff that can provide the district with strategies to increase AP participation and performance. The review includes district and school staff interviews, AP classroom observations, and AP documents review in each of the following program components:

- Academic and Learning Environment
- AP Foundation
- Data That Informs

- Instructional Support for Teachers and Support for Students and Families

A final report is issued with customized recommendations and associated timelines for implementation that is intended to augment work already done in the district. These services are offered free of charge for school district requests honored by the College Board.

This recommendation can be implemented with existing resources.

HIGH SCHOOL COMPLETION AND DROPOUT (REC. 7)

CISD lacks a comprehensive dropout reduction and high school completion program with detailed strategies outlined in the district and campus improvement plans. In particular, the district lacks specific strategies that target the district's student populations with the largest dropout rates: LEP and economically disadvantaged students.

CISD had the lowest or second lowest graduation rates among its peers for the Classes of 2006 through 2009 (**Exhibit 1-24**). Its graduation rates were lower than the regional and state rates for the Classes of 2007 through 2009. CISD's high dropout rates contributed to the district's low high school completion rates. CISD's dropout rates increased from 10.8 percent in 2005–06 to 23.5 percent in 2007–08 and dropped to 15.3 percent in 2008–09. Its dropout rates were higher than the regional and state rates throughout this period with the exception of 2005–06 when its dropout rate matched the Region 20 dropout rate.

CISD had the overall lowest graduation rate for the Class of 2009 among its peers and the second lowest graduation rate of Hispanic students. CISD's high school dropout rates for the Class of 2009 were particularly high among LEP students at 33.3 (**Exhibit 1-25**). In its 2008, 2009, and 2010 Performance-Based Monitoring Analysis System reports, TEA also cited the district (level 2) for high LEP annual dropout rates in grades 7–12. Compared to the statewide annual dropout rate for LEP students of 2.0 percent, CISD LEP students had a 5.9 percent dropout rate in 2010, 7.1 percent in 2009, and 5.6 percent in 2008.

CISD had the highest annual dropout rate in grades 7 to 12 among its peers in 2004–05 and 2008–09 and the second highest from 2005–06 to 2007–08 (**Exhibit 1-26**). Its annual dropout rates exceeded the Region 20 and state rates in 2004–05, 2007–08 and 2008–09.

**EXHIBIT 1-24
PERCENT OF STUDENTS GRADUATING AND DROPPING OUT
CLASSES OF 2006, 2007, 2008, AND 2009
CISD, PEER DISTRICTS, REGION 20 AND STATE**

	CLASS OF 2009		CLASS OF 2008		CLASS OF 2007		CLASS OF 2006	
	PERCENT GRADUATES	PERCENT DROP OUTS (4-YEAR)	PERCENT GRADUATES	PERCENT DROP OUTS (4-YEAR)	PERCENT GRADUATES	PERCENT DROP OUTS (4-YEAR)	PERCENT GRADUATES	PERCENT DROP OUTS (4-YEAR)
Quanah	93.8%	0.0%	94.7%	2.6%	97.1%	0.0%	97.2%	0.0%
Jim Hogg County	81.7%	17.1%	85.2%	13.6%	81.0%	13.1%	93.3%	6.7%
Freer	73.0%	15.9%	68.9%	26.2%	73.4%	14.1%	75.0%	15.0%
Cotulla	71.9%	15.7%	70.6%	23.5%	73.7%	20.0%	83.1%	10.8%
Region 20	75.4%	12.5%	74.0%	13.0%	74.5%	13.6%	77.3%	10.8%
State	80.6%	9.4%	79.1%	10.5%	78.0%	11.4%	80.4%	8.8%

SOURCE: Texas Education Agency, AEIS, 2006–07 through 2009–10.

**EXHIBIT 1-25
PERCENT GRADUATES AND DROPOUTS BY STUDENT GROUP
CISD AND PEER DISTRICTS
CLASS OF 2009**

DISTRICT	STATUS	ALL STUDENTS	AFRICAN AMERICAN	HISPANIC	ANGLO	ECONOMICALLY DISADVANTAGED	LEP
Quanah	Graduates	93.8%	*	100.0%	91.3%	85.7%	-
	Dropouts	0.0%	*	0.0%	0.0%	0.0%	-
Jim Hogg County	Graduates	81.7%	*	81.8%	*	84.2%	-
	Dropouts	17.1%	*	16.9%	*	15.8%	-
Freer	Graduates	73.0%	-	69.8%	88.9%	78.8%	*
	Dropouts	15.9%	-	18.9%	0.0%	15.2%	*
Cotulla	Graduates	71.9%	-	69.9%	100.0%	86.0%	66.7%
	Dropouts	15.7%	-	16.9%	0.0%	12.3%	33.3%

*Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34 CFR Part 99 and Texas Education Agency procedures OP 10-03.

SOURCE: Texas Education Agency, AEIS, 2009–10.

**EXHIBIT 1-26
ANNUAL DROPOUT RATES (GRADES 7-12)
CISD, PEER DISTRICTS, REGION 20 AND STATE
2004–05 TO 2008–09**

DISTRICT	2004–05	2005–06	2006–07	2007–08	2008–09
Jim Hogg County	0.6%	1.9%	2.7%	3.3%	3.2%
Freer	0.3%	4.3%	4.5%	5.2%	1.6%
Cotulla	1.3%	2.4%	3.1%	4.6%	3.4%
Quanah	0.0%	0.0%	0.0%	0.4%	0.0%
Region 20	1.2%	3.4%	3.2%	2.9%	2.8%
State	0.9%	2.6%	2.7%	2.2%	2.0%

SOURCE: Texas Education Agency AEIS, 2004–05 through 2008–09.

The Focused Data Analysis (FDA) of the Class of 2009 that TEA performed showed that the 20 students who dropped out were academically low performers: failing grades and low TAKS scores were prevalent among the group. All the dropouts had low attendance and truancy issues. CISD teachers did not take any action against students with excessive absences. Discipline was also identified as an issue with the majority of these students. This group of students, who did not include any migrant students, also had a high mobility rate moving in and out of school to live with different family members.

CISD administrators attribute the high dropout rate to multiple factors. These factors include frequent changes in high school principals that contributed to poor discipline, low attendance, poor academic performance, low engagement in school, and low parent expectations and involvement. This cohort of students also received poor elementary education at Ramirez Burks: when this cohort was in elementary school, the school was rated Academically Unacceptable (2004–05). Students in this group who were not planning to go to college also exhibited lack of engagement since the high school did not offer any classes of relevance to them or their post high school plans. The CTE program the high school offered was limited to Agriculture classes.

Although the district's dropout rate has remained high, its District Improvement Plan for 2010–12 does not include any goals that explicitly target graduation and dropout reduction. Under Goal 2 of closing the achievement gap between minority, special education, economically disadvantaged, Limited English Proficient, at-risk, and other students, the plan lists continuing support of the Parent education Program (PEP), identifying students for credit recovery, and enforcing the attendance policy. The word “dropout” is mentioned only once in regards to students who are teen parents. The Cotulla High School Campus Improvement Plan for 2010–2012 lists similar strategies to the strategies listed in the DIP including implementation of a mentoring program for students at risk of dropping out and a mandatory intervention meeting before a student withdraws. Neither plan explicitly articulates dropout prevention strategies specifically targeted to LEP or economically disadvantaged students; the two populations with the highest dropout rates.

In 2009–10, Cotulla High School increased its strategies to reduce dropout and improve high school completion. Cotulla High School hired a high school at-risk specialist who works at the high school counseling center and focuses

on enforcing attendance and monitoring services to at-risk students. The school offers a 4-day a week after school tutorial program, credit recovery, and mentoring of students. It also expanded its CTE class offering to appeal to non-college going students and moved 5th and 6th year high school students to a minimum high school plan. In spite of these efforts, a high percentage of administrators, teachers, staff, parents and students pointed to the district's dropout recovery program as ineffective and in need of improvement, as shown in **Exhibit 1-27**. Furthermore, the number of dropouts has remained high.

EXHIBIT 1-27
CISD PROGRAMS IN NEED OF IMPROVEMENT: DROPOUT PREVENTION*

CISD	PERCENT
Teachers	52.2%
Administrators	44.4%
Professional staff	42.9%
Parents	35.6%
Students	34.4%

*Survey respondents included 52 teachers, 8 administrators, 19 professional staff, 46 parents, and 169 students responded to the survey.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

Although CISD has had high dropout rates over the past five years, the district has done little to recover its dropouts. The district's current dropout recovery strategy is limited to contacting dropouts and inviting them to take the TAKS. Of the nine dropouts contacted from the Class of 2010, most needed both credits and passing TAKS.

The *Best Practices in Dropout Prevention* TEA 2008 study identified several effective dropout prevention strategies:

- **School-community collaboration** by recognizing the value of community entities such as libraries, places of worship, museums, and community agencies and businesses.
- **Safe learning environments** through the implementation of a comprehensive violence prevention plan including conflict resolution through problem recognition and evaluation, goal setting, planning, expecting challenges, controlling anger, and expressing emotion.

- **Family engagement** to affect student's academic achievement, attendance, attitudes and behavior in school.
- **Mentoring/tutoring** by pairing a caring adult to each student to engage in one-on-one activities focusing on academics.
- **Alternative schooling** that gives students the opportunity to succeed based on their own personal goals and achievements.
- **Active learning** implementing teaching and learning strategies that engage students in the learning process through cooperative learning, multiple intelligence theory, and project-based learning.
- **Career and technical education** integrating academic and career-based skills and providing all students with a solid academic foundation regardless of their post high school plans.

The *Dropout Recovery Resource Guide*, developed in 2008 for the Texas Education Agency, identifies a wide range of promising dropout recovery practices and offers hands-on strategies to districts on how to set-up effective dropout recovery programs. The Guide provides strategies for program planning and administration, program staffing, forming collaborative partnerships, identification and tracking of students who dropped out, re-enrollment, program options, academic supports, CTE supports, social supports, post-secondary advancement supports, how to address special populations, and program costs and funding.

While CISD is moving in the right direction by implementing several of the strategies identified as effective dropout prevention strategies, its high school dropout rate is still very high and its high school completion rate is low. To be effective, Cotulla High School needs to implement a comprehensive dropout reduction and high school completion program with multiple, inter-dependent strategies rather than a collection of individual strategies. The district also needs to recognize that dropout reduction and high school completion programs cannot reside in high school alone. They have to include all grade levels, starting in first grade or even earlier.

The district should implement a comprehensive dropout reduction and high school completion plan involving all grade levels. Each school and its staff should clearly understand their role in contributing to and affecting high school completion, be accountable, and take proactive

measures. The district should strengthen its vertical alignment not only with its curriculum, but also in regards to students' engagement, attendance, and behavior. Each school should implement appropriate strategies to facilitate high school completion and not just completion of grades at that respective school.

This recommendation can be implemented with existing resources.

LIBRARY STAFFING (REC. 8)

CISD lacks a staffing strategy to determine its number of certified librarians and aides. This has resulted in the district having fewer certified librarians and aides as compared to standards established by the Texas State Library and Archives Commission and has limited teacher and student library use.

The Texas State Library and Archives Commission (TSLAC) in its *School Library Program Standards: Guidelines and Standards* classify libraries into four categories: exemplary, recognized, acceptable, and below standard. The TSLAC public school library staffing standards are based on schools' average daily attendance (ADA). **Exhibit 1-28** shows TSLAC standards for professional and non-professional staff.

According to the minimal standards (Acceptable) of TSLAC, schools with 500 or fewer students require one certified librarian and 0.5 paraprofessional/aide to meet the Acceptable standard. Schools with 500 to 1,000 students require 1.0 certified librarian and 1.0 paraprofessional. CISD has three schools with enrollment between 122 and 266 students and one school with 552 students. CISD has two certified librarians: one librarian is in charge of the elementary school libraries and one librarian is in charge of the secondary school libraries. In addition, CISD has two library paraprofessionals, one at Ramirez Burks Elementary School and one at Newman Middle School.

Exhibit 1-29 shows 2010–11 student enrollments at each CISD school and the number of professional and paraprofessional library staff, and compares these statistics to the TSLAC acceptable standards. Based on the student population, Encinal Elementary and Cotulla High should have 0.5 paraprofessional/aide each. Newman Middle School has a full-time aide although a 0.5 aide meets the acceptable standard. However, Newman Middle School does not have a librarian.

This distribution of librarians and aides and the level of their non-library duties affect library use. The elementary librarian spends four days a week at Ramirez Burks Elementary and

**EXHIBIT 1-28
TSLAC LIBRARY STAFFING STANDARDS
2010**

STAFF	STANDARDS			
	EXEMPLARY	RECOGNIZED	ACCEPTABLE	BELOW STANDARD
Professional Staff	At least:	At least:	At least:	
0-500 ADA	1.5 Certified Librarians	1.0 Certified Librarian	1.0 Certified Librarian	Less than 1 Certified Librarian
500-1,000 ADA	2.0 Certified Librarians	1.5 Certified Librarians	1.0 Certified Librarians	Less than 1.0 Certified Librarians
1,001-2,000 ADA	3.0 Certified Librarians	2.0 Certified Librarians	1.0 Certified Librarians	Less than 1.0 Certified Librarians
2,001 + ADA	3.0 Certified Librarians + 1.0 Certified Librarian for each 700 students	2.0 Certified Librarians + 1.0 Certified Librarian for each 1,000 students	2.0 Certified Librarians	Less than 2.0 Certified Librarians
Paraprofessional Staff	At least:	At least:	At least:	
0-500 ADA	1.5 Paraprofessionals	1.0 Paraprofessionals	0.5 Paraprofessionals	Less than 0.5 Paraprofessionals
500-1,000 ADA	2.0 Paraprofessionals	1.5 Paraprofessionals	1.0 Paraprofessionals	Less than 1.0 Paraprofessionals
1,001-2,000 ADA	3.0 Paraprofessionals	2.0 Paraprofessionals	1.5 Paraprofessionals	Less than 1.5 Paraprofessionals
2,001 + ADA	3.0 Paraprofessionals + 1.0 Paraprofessional for each 700 students	2.0 Paraprofessionals + 1.0 Paraprofessional for each 1,000 students	2.0 Paraprofessionals	Less than 2.0 Paraprofessionals

SOURCE: Texas State Library and Archives Commission (TSLAC), School Library Programs: Standards and Guidelines for Texas, 2010.

**EXHIBIT 1-29
CISD ENROLLMENT, NUMBER OF LIBRARIANS AND LIBRARY AIDES,
TSLAC ACCEPTABLE STANDARD BY CAMPUS
2010–11**

CAMPUS	ENROLLMENT	ADA*	LIBRARIANS	TSLAC ACCEPTABLE STANDARD	LIBRARY AIDES	TSLAC ACCEPTABLE STANDARDS	OVER/ (UNDER)
Encinal Elementary	122	116	0.20 Certified Librarian	At least 1 Certified Librarian	0	At least 0.5 aide	(0.5 aides)
Ramirez Burks Elementary	552	524	0.80 Certified Librarian	At least 1 Certified Librarian	1	At least 1.0 aide	-
Newman Middle School	266	253	0 Librarian	At least 1 Certified Librarian	1	At least 0.5 aide	0.5 aide
Cotulla High School	263	250	1 Librarian	At least 1 Certified Librarian	0	At least 0.5 aide	(0.5 aides)
TOTAL	1,210*	1,143	2 Certified		2.0	2.5	(0.5)

*ADA was calculated by multiplying school enrollment by 95 percent.

**Total includes seven students at Bigfoot Alternative Center.

SOURCE: CISD Enrollment for School Year 2010–11, February 25, 2011 Enrollment. Texas State Library and Archives Commission (TSLAC), School Library Programs: Standards and Guidelines for Texas, 2011.

one day at Encinal Elementary. During the four days each week when the librarian is not at Encinal Elementary, although teachers can use the library, its use is limited because it does not have an aide. The elementary librarian does not have non-library duties but spends 90 percent or more of her time on clerical duties at both libraries. The secondary

librarian spends all her time at the high school. The high school library is closed when the librarian is not there because of the additional non-library duties. The secondary librarian has multiple non-library responsibilities: serves as a substitute teacher, when needed; is in charge of benchmark testing; is the “teacher of record” for a reading remediation program;

monitors TAKS testing; works with National Honor Society students; and chaperones field trips. When she does not perform non-library duties, the librarian spends about five percent of her time shelving and 95 percent of her time cataloging and cleaning up the library database. In addition, the high school library's use has also been limited because the library was relocated to a classroom and is awaiting construction of a new library.

The middle school library only has an aide; the library is closed when the aide is involved in other non-library duties, such as frequently serving as a substitute teacher. CISD librarians spend little time on high priority activities such as collaborating and working with teachers and students. The elementary librarian estimated that she spends less than 10 percent of her time working with teachers. The secondary librarian indicated that teachers do not ask for her assistance and do not use the library for research projects because the library in its current location does not have any computers. Teachers tend to take their classes to the computer lab to work on research projects and do not consult the librarian or seek her assistance.

The lack of library aides has a significant impact on the services that librarians can provide. The 2001 study *Texas School Libraries: Standards, Resources, Services and Student Performance* showed that lower than recommended staffing levels and especially the absence of library aides significantly curtail the range and type of services that librarians can provide. The presence of library aides and the number of hours they work are critical to librarians' ability to perform the range of high priority activities. Library aides "free" the librarian from having to perform basic library activities and allow the librarian to allocate time to activities that are more directly related to teaching and training staff and students, such as collaboratively planning and teaching with teachers, providing staff development to teachers, facilitating information skills instruction, managing technology, communicating with school administrators, and providing reading incentive activities. In addition, the extent to which library aides are available increases library usage by individuals and classes.

CISD should develop a librarian staffing strategy that enables each campus to have a fully staffed library. To meet acceptable library staffing standards, CISD would need to create two librarian and a 0.5 library aide positions. As librarians are key academic support staff, each school should have a full-time librarian. Similarly, Encinal Elementary and Cotulla High School should each have a 0.5 aide. Therefore, the full-time

aide at Newman Middle School should spend 0.5 of the time at Newman and 0.5 at Cotulla High School. The fiscal impact of this recommendation beginning in 2011–12 is based on a salary of a certified librarian of \$54,575 (the average salary for librarian—\$50,579 plus \$3,996 in benefits. Benefits are based on monthly insurance cost for district—\$333 times 12).

The annual cost for adding two librarians is \$109,150.

The salary of the library aide of \$8.77 per hour multiplied by 20 hours per week multiplied by 38 weeks a year, or \$6,665 annually.

Total annual costs for this recommendation would be \$115,815 for a 5-year total of \$579,075.

LIBRARY COLLECTION SIZE AND AGE (REC. 9)

CISD library collections are outdated with an average collection age of 24 to 27 years. All collections are below the Acceptable standard as defined by the Texas State Library and Archives Commission.

The *School Library Programs Standards and Guidelines for Texas* defines an "Acceptable" collection as a balanced collection of 9,000 books, audiovisual software, and multimedia, or at least 16 items per student at the elementary level, at least 14 items per student at the middle school level, and at least 12 items per student at the high school level, whichever is greater. A "Recognized" collection is defined as a balanced collection of at least 10,800 books, audiovisual software, and multimedia, or at least 18 items per student at the elementary level, at least 16 items per student at the middle school level, and at least 14 items per student at the high school level, whichever is greater. An "Exemplary" collection is a balanced collection with at least 12,000 books, audiovisual software, and multimedia, or at least 20 items per student at the elementary level, at least 18 items per student at the middle school level, and at least 16 items per student at the high school level, whichever is greater.

Three CISD libraries meet or exceed the TSLAC standard relating to collection size and one library falls below standard. Ramirez Burks Elementary and Newman Middle School meet the Exemplary standard, Encinal Elementary meets the Acceptable standard, and Cotulla High School is below standard (**Exhibit 1-30**). However, a high percentage of CISD's library collection is out of date (older than 15 years).

The Texas State Library & Archives Commission's standard regarding average collection age, has four categories. Libraries

**EXHIBIT 1-30
ENROLLMENT, LIBRARY HOLDINGS, BOOKS PER STUDENT AND STANDARDS
2010–11**

SCHOOL	AVERAGE DAILY ATTENDANCE	NUMBER OF BOOKS	NUMBER OF BOOKS PER STUDENT	TSLAC LIBRARY STATUS – COLLECTION SIZE
Encinal Elementary	116	9,190	79	Acceptable
Ramirez Burks Elementary	524	21,856	42	Exemplary
Newman Middle School	253	15,086	60	Exemplary
Cotulla High School	250	8,868	35	Below Standard

SOURCE: CISD Librarians Report, February 18, 2011. CISD Enrollment Recap Report for School Year 2010–11, Enrollment as of February 25, 2011. Texas State Library and Archives Commission (TSLAC), School Library Programs: Standards and Guidelines for Texas, 2011.

falling under the Exemplary category maintain an overall average age of collection of less than 11 years. Libraries falling under the Recognized category maintain an overall average age of collection of less than 13 years. Libraries falling under the Acceptable category maintain an overall average age of collection of less than 15 years. Libraries that are Below Standard maintain an overall average age of collection of 15 or more years. CISD school libraries have collections with an average age of 24 to 27 years, all below the Acceptable standard. Encinal Elementary average collection age is 24. The average collection age at Ramirez Burks Elementary and Newman Middle School is 26 years. The average collection age at Cotulla High School is 27 years. On average, 83

percent of CISD's library materials are more than 15 years old. The percentage of items that are more than 15 years old ranges from 74 percent at Cotulla High School library to 90 percent at Ramirez Burks Elementary (**Exhibit 1-31**).

Overall, CISD has a collection of 55,000 books, more than the 36,000 books it needs to meet the Acceptable standard. Only 15.2 percent of its current collection is less than 15 years old. Using the 36,000 minimum collection size, CISD needs to replace approximately 27,627 or 76.7 percent of the books (**Exhibit 1-32**).

CISD should develop a library collection strategy that enables each campus library to meet minimum standards

**EXHIBIT 1-31
CISD SCHOOL LIBRARIES COLLECTION AND COLLECTIONS AGE
2010–11**

SCHOOL	COLLECTION SIZE	PERCENTAGE OF COLLECTION 15 OR MORE YEARS OLD	NUMBER OF ITEMS 15 OR MORE YEARS OLD
Encinal Elementary	9,190	84%	7,720
Ramirez Burks Elementary	21,856	90%	19,670
Newman Middle School	15,086	84%	12,672
Cotulla High School	8,868	74%	6,565

SOURCE: CISD Librarians Report, March 2011.

**EXHIBIT 1-32
CISD SCHOOL LIBRARIES COLLECTION SIZE AND ITEMS NEEDING REPLACEMENT
2010–11**

SCHOOL	COLLECTION SIZE	COLLECTION SIZE TO MEET ACCEPTABLE STANDARD	NUMBER OF BOOKS LESS THAN 15 YEARS OLD	NUMBER OF BOOKS IN NEED OF REPLACEMENT*
Encinal Elementary	9,190	9,000	1,470	7,530
Ramirez Burks Elementary	21,856	9,000	2,186	6,814
Newman Middle School	15,086	9,000	2,414	6,586
Cotulla High School	8,868	9,000	2,303	6,697
TOTAL	55,000	36,000	8,373	27,627

*Number of books in need of replacement = number of books meeting Acceptable standard – number of books less than 15 years old.

SOURCE: CISD Librarians Reports, March 2011.

both in terms of collection size and age. As shown in **Exhibit 1-32**, CISD needs to replace 27,627 books: 14,344 elementary school books and 13,283 books for its secondary school libraries. According to the *School Library Journal*, the 2011 average price of children’s titles is \$21.55 and the average price of a young adult book is \$24.97. Replacing 14,344 children books is estimated at \$309,113 (14,344 x \$21.55). Replacing 13,283 young adult books is estimated at \$331,677 (13,283 x \$24.97). The total cost of replacing

27,627 books is estimated at \$640,790. CISD should update its libraries over a ten-year period to adequately distribute the total cost associated with this recommendation. CISD needs to add/replace 27,627 books. Replacing these books is estimated at \$640,790 or \$64,079 a year. CISD may reduce the number of books it needs to replace by accessing online databases and may consider book acquisitions through book fairs and business sponsorships.

FISCAL IMPACT

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

RECOMMENDATION	2011-12	2012-13	2013-14	2014-15	2015-16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
1. Develop and implement a program evaluation system.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2. Develop a needs assessment of its curriculum management system to determine the underlying causes behind the inconsistent implementation, develop an implementation manual based on this assessment, and institute a uniform lesson review system to monitor curriculum implementation.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3. Conduct a comprehensive evaluation of its G/T program.	(\$1,000)	(\$1,000)	(\$1,000)	(\$1,000)	(\$1,000)	(\$5,000)	\$0
4. Expand and increase the incentives it offers to teachers to obtain an ESL certification and publicize its change of incentive policy among high school teachers.	(\$1,000)	(\$2,000)	(\$3,000)	(\$4,000)	(\$5,000)	(\$15,000)	\$0
5. Establish a CTE Department and an advisory committee to assist in evaluating the program at Cotulla High School.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6. CISD should review its AP participation policy to determine whether students who take AP classes are academically prepared for such classes.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
7. Implement a comprehensive dropout reduction and high school completion program with multiple, inter-dependent strategies.	\$0	\$0	\$0	\$0	\$0	\$0	\$0

FISCAL IMPACT (CONTINUED)

RECOMMENDATION	2011-12	2012-13	2013-14	2014-15	2015-16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
8. CISD should develop a librarian staffing strategy that enables each campus to have a fully staffed library.	(\$115,815)	(\$115,815)	(\$115,815)	(\$115,815)	(\$115,815)	(\$579,075)	\$0
9. Develop a library collection strategy that enables each campus library to meet minimum acceptable standards both in terms of collection size and age.	(\$64,079)	(\$64,079)	(\$64,079)	(\$64,079)	(\$64,079)	(\$320,395)	\$0
TOTALS	(\$181,894)	(\$182,894)	(\$183,894)	(\$184,894)	(\$185,894)	(\$919,470)	\$0

CHAPTER 2

DISTRICT LEADERSHIP, ORGANIZATION, AND MANAGEMENT

COTULLA INDEPENDENT SCHOOL DISTRICT

CHAPTER 2. DISTRICT LEADERSHIP, ORGANIZATION, AND MANAGEMENT

Effective school districts establish goals based on strategic planning efforts, clearly defined roles for the Board of Trustees and the district's management, and policies and processes in place to ensure student learning. The organization and management of a school district requires cooperation between elected members of the Board of Trustees, the superintendent, and the district staff. Their participation and involvement from the community is essential for strong school governance.

The board hires the district's superintendent to perform as the Chief Executive Officer (CEO) who implements the board's vision by establishing the district's organizational structure, overseeing daily operations, providing administrative and instructional leadership, and recommending staffing and funding allocations to achieve established goals. The board's role is to establish goals and objectives for the district in both instructional and operational areas, determine the policies that will govern the district, approve the plans to implement those policies and ensure adequate funding is available to carry out the primary mission of the district, which is to provide a high quality education to its students.

An elected seven-member Board of Trustees governs Cotulla Independent School District (CISD), with board members serving three-year terms. **Exhibit 2-1** identifies the 2010–11 CISD board members, their position, term expiration, and occupation. Board member Kim Hoff previously served the CISD as an elementary principal and was appointed to the Board in January 2011 to complete the term of a resigned board member.

The board has established four standing committees and each board member is appointed to at least one of the committees. The four standing committees cover construction, finance, discipline, and academics.

Board meetings are held on the third Monday of each month at 6:00 PM in the high school cafeteria, with the June and December meetings held at the Encinal Elementary School. The public is welcome to attend all meetings with individuals allotted five minutes to voice opinions or concerns up to a total of 30 minutes per meeting. Community members who wish to address the board about specific items on the agenda or other issues sign up with the board president or the superintendent prior to the meeting.

The superintendent, in consultation with the board president, prepares the agenda, and any board member may request an item be included on the agenda. In accordance with local board policy, the deadline for submitting items for inclusion on the agenda is noon of the third calendar day before regular meetings and noon of the third calendar day before special meetings. Any trustee may request that a subject be included on the agenda for a meeting. The Board President does not have authority to remove from the agenda a subject that was timely submitted by another trustee without that trustee's specific authorization. The agenda is posted at least 72 hours in advance of regular meetings on the door outside of the administrative offices located at 310 North Main Street in Cotulla.

The superintendent prepares a letter to the board as part of each board agenda packet that outlines events since the last

EXHIBIT 2-1 CISD BOARD OF TRUSTEES 2010-2011 SCHOOL YEAR

NAME	BOARD POSITION	TERM EXPIRATION	OCCUPATION
Roel (Roy) Rodriguez, Jr.*	President	2011	Vice President, Stockmen's National Bank
Deonicio (Dennis) Ramirez, Jr.	Vice President	2011	Kerr McGee Production
Raquel Nunez	Secretary	2012	Center Director, Teaching & Mentoring Communities, Inc.
Kim Hoff	Member	2011	Family Veterinarian Clinic, Former CISD Teacher/Principal
Scott Reese	Member	2012	Rancher and Self-Employed Gauger
George Trigo	Member	2013	Justice of the Peace, Rancher, and former County official
Alfredo Zamora, Jr.	Member	2013	CEO, South Texas Rural Health Services

*Roel Rodriguez, Jr. was replaced by Juan Dominguez during the 2011 board elections.

SOURCE: CISD Central Office and Review Team Interviews, February 2011.

board meeting, upcoming events, and information about items on the agenda. The superintendent's secretary collects information for the board packet, including supporting documentation for posted agenda items. Board packets are delivered to trustees via email on the Friday before the regularly scheduled Monday night board meeting. Any board member may contact the superintendent with questions or clarification about information in the agenda packet.

Prior to CISD, the superintendent served as superintendent at Balmorhea ISD and as a central administrator at Presidio ISD. The superintendent's current 5-year contract expires in June 2015 however, as of June 2011 she has accepted the position of superintendent of West Oso ISD. Her responsibilities include, but are not limited to, leadership for the planning, operation, supervision, and evaluation of the educational programs, services, and facilities of the district; assuming administrative authority and responsibility for the assignment and evaluation of all personnel; managing the district's daily operations; and preparing and submitting to the Board of Trustees a proposed budget and organizing the district's central administration.

ACCOMPLISHMENTS

- The CISD School Health Advisory Council (SHAC) has developed partnerships with outside organizations to promote the health and well-being of students.
- CISD uses Parent Involvement Aides at each campus to serve as a liaison between students, parents, and the district and support the Texas Education Agency's statewide Parental Involvement Initiative.

FINDINGS

- The ability of the board to effectively operate is undermined by a lack of methods and protocols defining relationships between and among school board members and the superintendent.
- CISD's organizational structure does not support the most efficient and effective structure for conducting business and operations.
- CISD lacks meaningful two-way communication between central administration and other district stakeholders.
- CISD does not have a records management process that easily or timely provides information to

requestors, which can affect perceptions of district accountability to its stakeholders.

- Board meeting agendas prepared by the administration and presented to the board for review and approval do not contain appropriate summarized information for board members to make informed business decisions.
- The CISD superintendent's performance evaluation lacks specific performance measures.
- CISD has not developed a strategic plan that anticipates upcoming decisions that will result from changes in property tax revenue and student enrollment due to the current boom in the oil and gas industry.
- CISD does not have an effective volunteer program that encourages participation by community members.

RECOMMENDATIONS

- **Recommendation 10: Obtain additional guidance for governance issues from external authorities and implement self-policing guidelines to encourage teamwork.**
- **Recommendation 11: Revise the district organizational chart and restructure roles and responsibilities to improve the district's accountability for student performance, financial operations, and support service effectiveness.**
- **Recommendation 12: Develop communication procedures that would increase the opportunity for district stakeholders to provide meaningful input into the decision-making processes of key district initiatives.**
- **Recommendation 13: Clarify the process for school board or other authorized requests for information, identify employees responsible for answering records requests and train them in the requirements of the Public Information Act.**
- **Recommendation 14: Analyze and present monthly financial and operational information to the board in an easily understood format.**
- **Recommendation 15: Incorporate specific measurable performance standards into the superintendent's performance evaluation.**

- **Recommendation 16: CISD should conduct a comprehensive assessment of the impact that the oil boom will have on student enrollment and property values.**
- **Recommendation 17: Appoint the campus Parent Involvement Aides as the volunteer coordinator for each campus.**

DETAILED ACCOMPLISHMENTS

SCHOOL HEALTH ADVISORY COUNCIL PARTNERS WITH OUTSIDE ORGANIZATIONS

The CISD School Health Advisory Council (SHAC) has developed partnerships with outside organizations to promote the health and well-being of students.

In February 2011, the SHAC brought together community resources to host the Second Annual Coordinated School Health Forum to address health issues and foster student achievement by helping students establish healthy behaviors to last a lifetime. The Coordinated School Health program provides a systematic approach to promote healthy choices among CISD students in order to reduce the physical, emotional, and social problems that interfere with student function. CISD collaborates with outside organizations to enhance ongoing student and community awareness of health and social issues. The eight components of Coordinated School Health incorporate education for lifelong healthy living choices and include:

- Health education;
- Physical education;
- Health services;
- Mental health and social services;
- Nutrition services;
- Healthy and safe environments;
- Family and community involvement; and
- Staff wellness.

Approximately 125 parents and members of the community attended the event, visiting booths set up and supervised by members of the SHAC. The booths provided literature, surveys, and interactive lesson examples for each of the eight health components.

Members of the SHAC worked diligently for several months prior to the forum in order to obtain participation from

outside organizations. In addition to providing blood pressure and glaucoma checks and H1N1 vaccines, the SHAC arranged participation by the following organizations:

- South Texas Rural Health Services
- Camino Real Mental Health and Mental Retardation
- Serving Children and Adolescents in Need, Inc.
- Wesley Nurse program
- Methodist Hospital Psychiatric Program
- Texas State Department of Health Services

In January 2011, the SHAC partnered with the Regional Educational Service Center 20 (RESC) in San Antonio to present pertinent information on the issue of bullying in schools. The RESC consultant presented a program at the middle school cafeteria to parents, school staff, and community members called “411 on Bullying.” The presentation was also video streamed to the Encinal Elementary School cafeteria for individuals in that community. The program brought to light relevant facts, current trends, and techniques to prevent bullying and other acts of violence in schools. Approximately 150 individuals attended the event and the informal feedback to the district was very positive.

In addition to hosting forums and presentations to promote healthy lifestyle choices, the SHAC further encourages parental involvement by offering students a reward of a free “jeans” day or “out of uniform” day if their parents attend the events.

The events coordinated by the CISD SHAC are an important means of incorporating education into choices made for lifelong healthy living, nutritious meals, policies that support a positive psycho-social and hazard-free environment, involvement of families and communities in promoting the well-being of students, opportunities for CISD staff members to foster their own well-being, and services that prevent or treat mental and physical health conditions that potentially interfere with student learning.

PARENT INVOLVEMENT AIDES

CISD uses Parent Involvement Aides at each campus to serve as a liaison between students, parents, and the district and support the Texas Education Agency’s statewide Parental Involvement Initiative.

As stated by the Texas Education Agency, the mission of the public education system's No Child Left Behind (NCLB) State Parent/Family Involvement Plan is to:

"...ensure that all Texas children have access to a quality education that enables them to achieve their potential and fully participate now and in the future in the social, economic, and educational opportunities of our state and nation. That mission is grounded on the conviction that a general diffusion of knowledge is essential for the welfare of this state and for the preservation of the liberties and rights of citizens. It is further grounded on the conviction that a successful public education system is directly related to a strong, dedicated, and supportive family and that parental involvement in the school is essential for the maximum educational achievement of a child."

The vision of the statewide initiative is to ensure parents, families, educators, and members of the community work together to improve achievement for all students. As part of this vision, the TEA has established a number of goals for local school districts to include:

- Promoting regular, two-way communication between home and school;
- Promoting a safe and open atmosphere for parents/families to visit the school their children attend and actively solicit parent/family support and assistance for school programs;
- Ensuring that information is disseminated to parents on all required notifications;
- Supporting the development of trusting and respectful relationships among parents, families, educators, and community members;
- Ensuring all parents/families, regardless of income, education, or cultural background, are supported as concerned and involved partners who want their children to learn at high levels;
- Encouraging parents to play an integral role in assisting their child's learning; and
- Offering parent/family learning workshops on relevant topics to be held at convenient times and places easily accessible to all families.

The Parent Involvement Aide at each of the CISD campuses is responsible for the following tasks and duties to support the goals of the Parental Involvement Initiative:

- Checking student absences;
- Documenting student illness which requires parental action;
- Maintaining records for student behavior;
- Maintaining communication from the school regarding parent meetings or special concerns;
- Transporting students and/or parents to and from school as the need arises;
- Tending and sharing documents with the attendance committee;
- Maintaining a log of daily contact, to include absences, mileage, and home visits;
- Scheduling parent conferences;
- Documenting student tardiness;
- Checking daily attendance postings for the campus;
- Documenting all visitors to the campus
- Preparing attendance sheets for substitute teachers;
- Updating the weekly campus newsletter; and
- Documenting all parental involvement for the campus, to include open house, events, and parent meetings.

The Aide for each CISD campus exists to facilitate and coordinate a strong relationship between parents, community, and school. They share information with parents that provide them with varied opportunities to be involved in supporting their child's learning at home. Aides provide outreach for parents of limited English proficiency (LEP) so they can be involved in their child's education, which includes providing pertinent school information in the parents' native language.

The Aides document attendance for parent teacher organizations and events at each of the campuses and send out flyers to parents to encourage their involvement in student learning. Parent Involvement Aides call parents when students are absent and coordinate the appropriate documentation necessary when students must present proof for excused or excessive absences. The Aides coordinate

communication between parents and teachers and facilitate programs to further engage parents in their child's education.

The Parent Involvement Aide at the CISD middle school implemented the Circles of Purpose program with a guest speaker to discuss the importance of parental involvement in education. The Circle of Purpose program is designed to teach strategies to accomplish the following:

- Increase communication by gaining the participation of parents at their child's parent-teacher conferences and by communicating directly with parents through phone calls, letters, home visits, and conferences;
- Increase student attendance by stressing to parents the importance of daily school attendance and maintaining the health of their child;
- Increase parent participation by helping parents become advocates for the school and volunteering at school functions;
- Increase student achievement by decreasing student absenteeism and setting goals to motivate a child toward success; and
- Decrease student discipline referrals with early communication between the family and the school to set behavior goals.

The daily interaction of the CISD Parent Involvement Aides with students, parents, and educators and their own initiatives to increase parent participation in school-related activities works to accomplish all goals established by the Parental Involvement Initiative.

DETAILED RECOMMENDATIONS

BOARD GOVERNANCE (REC. 10)

The ability of the board to effectively operate is undermined by a lack of methods and protocols defining relationships between and among school board members and the superintendent.

Interviews with a majority of school board members indicated a high level of distrust between board members and district management that has resulted in operations problems causing disruption to both the board meeting process and administrative activities. Examples include:

- Instances of personal attacks and an overall disregard for one another and meeting participants at school board meetings;

- Perceptions that input from campus administrators, teachers, and/or parents and the community is not included by district management when presenting information to the school board on district initiatives;
- Failure by district management to respond to repeated information requests from board members in a timely manner;
- Perceptions that information received from district management is presented with preferential treatment towards certain district programs and initiatives causing some board members to seek input directly from campus-level staff; and
- A belief among school board members that the central administration does not distribute information on the district, including incidents involving district staff, to all school board members equally.

These instances as identified by the review team are in conflict with team building concepts required in annual training for board members as required by CISD Board Policy BBD (LEGAL). This training is designed to "enhance the effectiveness of the Board-Superintendent team and to assess the continuing education needs of the Board-Superintendent team." Regional Education Service Center XX (Region 20)'s school board training, designed to meet State Board of Education annual training requirements, that includes communication and how to function as a team of eight.

The extent to which conflict exists among school board members and district management is also exemplified by survey results from the school review. **Exhibit 2-2** presents school review survey responses from parents, teachers, administrators, professional staff, and auxiliary staff regarding the effectiveness of the board and superintendent relationship. When asked about the ability of the superintendent and the board to work well together, 50.4 percent of all respondents indicated they feel the relationship is poor or below average while only 17 percent of all respondents categorized this relationship as good or excellent. In addition, 37.6 percent of survey respondents indicated that they believe the performance of the school board in setting good policies for the district is poor or below average, while only 16.5 percent classified this performance as good or excellent.

This level of conflict is marked by a breakdown in normal decision making processes and participants feeling threatened. It produces low morale, low productivity, and low effectiveness. While the CISD superintendent and Board

**EXHIBIT 2-2
CISD SURVEY RESPONSES**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
The ability of the superintendent and the board to work well together.						
Parents	24.4%	24.4%	28.9%	8.9%	6.7%	6.7%
Teachers	33.3%	31.4%	15.7%	7.8%	5.9%	5.9%
Administrators	14.3%	28.6%	28.6%	14.3%	14.3%	0.0%
Professional Staff	21.1%	10.5%	36.8%	10.5%	21.1%	0.0%
Auxiliary Staff	14.3%	28.6%	42.9%	14.3%	0.0%	0.0%
TOTAL	25.6%	24.8%	24.8%	9.0%	8.3%	7.5%
The performance of the school board in setting good policies for the district.						
Parents	10.9%	28.3%	37.0%	10.9%	2.2%	10.9%
Teachers	13.7%	23.5%	41.2%	13.7%	2.0%	5.9%
Administrators	0.0%	14.3%	42.9%	28.6%	14.3%	0.0%
Professional Staff	26.3%	10.5%	36.8%	5.3%	10.5%	10.5%
Auxiliary Staff	0.0%	71.4%	0.0%	14.3%	14.3%	0.0%
TOTAL	12.8%	24.8%	36.1%	12.0%	4.5%	9.8%

NOTE: Totals may not equal to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

of Trustees have worked with a Texas Association of School Boards (TASB) facilitator to develop draft board operating procedures to help overcome these conflicts, it has yet to be fully implemented and made an integral part of the board's conduct.

Exhibit 2-3 shows CISD Board Members Ethics Standards in CISD Policy BBF (LOCAL). This policy covers the standards to be followed by board members in dealing with district issues and working as a team to promote the best interests of the district as a whole. This policy was last updated in June 2000.

With the many duties for which the Board of Trustees is responsible, it is imperative that work is conducted cooperatively with each other and with the superintendent in order to effectively lead and manage the CISD.

CISD should obtain additional guidance for governance issues from external authorities and implement self-policing guidelines to encourage teamwork.

Self-policing should be combined with one-on-one and small group discussions among the superintendent, board president, and school board members. The district should pursue the use of executive coaching or group conflict resolution to overcome the breakdown in the school board's decision-making ability. With a multitude of resources available from the Texas Association of School Boards

(TASB), many education consultants and mediators across the state of Texas, online materials available from TASB and other education resources, the cost for training could be nominal. The district should use the established training budget to obtain materials, online resources, one-on-one and group counseling or remediation services.

CISD should also consider the continued use of the TASB facilitator to address specific concerns regarding the micromanagement of district activities by board members and to build trust and strong working relationships between the board and the superintendent. As governance issues are addressed, the board can discuss specific remedies or practices that would support their efforts to avoid micromanagement.

The superintendent distribute a weekly note to all board members to keep them up to date on district issues and accomplishments from the previous week. CISD should also consider holding informal monthly meetings to openly address these issues. The Board of Trustees might also consider developing a sub-committee for the Board charged with developing strategies to improve board governance and interaction amongst board members and central administrators. Feedback from meetings might also indicate needs for discussion items or additional training.

Additional costs for training and facilitators would be approximately \$4,800 per year for two years based on a facilitator fee of \$150 per hour for quarterly eight-hour

**EXHIBIT 2-3
COTULLA ISD ETHICS STANDARDS
POLICY BBF (LOCAL)**

ETHICAL STANDARD	STANDARD COMPONENTS
Equity in Attitude	<ul style="list-style-type: none"> • I will be fair, just, and impartial in all my decisions and actions. • I will accord others the respect I wish for myself. • I will encourage expressions of different opinions and listen with an open mind to others' ideas.
Trustworthiness in Stewardship	<ul style="list-style-type: none"> • I will be accountable to the public by representing District policies, programs, priorities, and progress accurately. • I will be responsive to the community by seeking its involvement in District affairs and by communicating its priorities and concerns. • I will work to ensure prudent and accountable use of District resources. • I will make no personal promise or take private action that may compromise my performance or my responsibilities.
Honor in Conduct	<ul style="list-style-type: none"> • I will tell the truth. • I will share my views while working for consensus. • I will respect the majority decision as the decision of the Board. • I will base my decisions on fact rather than supposition, opinion, or public favor.
Integrity of Character	<ul style="list-style-type: none"> • I will refuse to surrender judgment to any individual or group at the expense of the District as a whole. • I will consistently uphold all applicable laws, rules, policies, and governance procedures. • I will not disclose information that is confidential by law or that will needlessly harm the District if disclosed.
Commitment to Service	<ul style="list-style-type: none"> • I will focus my attention on fulfilling the Board's responsibilities of goal setting, policymaking, and evaluation. • I will diligently prepare for and attend Board meetings. • I will avoid personal involvement in activities the Board has delegated to the Superintendent. • I will seek continuing education that will enhance my ability to fulfill my duties effectively.
Student-Centered Focus	<ul style="list-style-type: none"> • I will be continuously guided by what is best for all students of the District.

SOURCE: Cotulla ISD Online Board Policy, April 2011.

sessions. Internal training and enhanced efforts toward conflict resolution and team building to create a better means of communication would cost nothing.

ORGANIZATION STRUCTURE (REC. 11)

CISD's organizational structure does not support the most efficient and effective structure for conducting business and operations.

CISD's senior administrative organization includes a superintendent, assistant superintendent, a Finance Director, a Director of Technology, a Director of Federal Programs and Assessment, and a Director of Student Services all of whom report directly to the superintendent. Instructional facilitators at the campus level report directly to the assistant superintendent who is responsible for instruction. The campus administrators, district nurse, director of music and cultural arts, maintenance supervisor, and athletic director report directly to the superintendent while the transportation

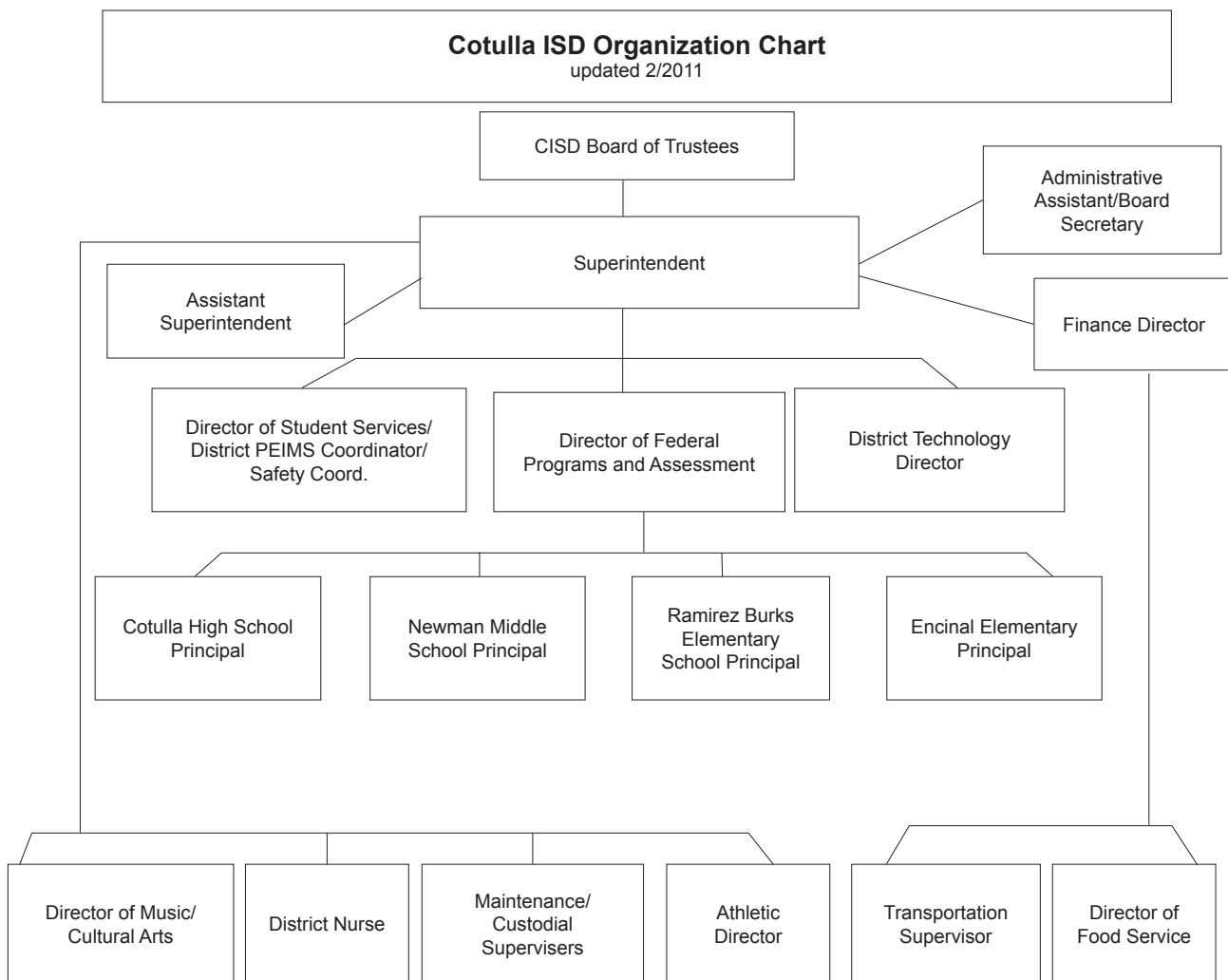
supervisor and director of food service report directly to the Finance Director.

Exhibit 2-4 presents the district's organization chart of record as provided to the review team in February 2011. In this chart, the lines of authority are not clearly indicated, the assistant superintendent appears to have no responsibility other than reporting to the superintendent, Food Service Director and the Transportation Supervisor both report directly to the Finance Director, and all other personnel report directly to the Superintendent.

Since onsite work in February 2011, the district updated their organization chart in April 2011 to better reflect lines of authority and clarify organizational structure. This chart differs from the one provided by the district during onsite work in the following ways:

- The Elementary and Secondary Curriculum Facilitators report to the Assistant Superintendent;

**EXHIBIT 2-4
CISD ORGANIZATION CHART
FEBRUARY 2011**



SOURCE: CISD Central Office, February 2011.

- The four campus principals each report to the Superintendent; and
- The Maintenance/Custodial Supervisors report to the Finance Director.

The superintendent assumed district leadership of CISD in August 2005. Interviews with the superintendent and school board members indicate that prior to the superintendent’s arrival the district’s financial state was in disarray and the district lacked a strong instructional leader. This organizational structure placed a majority of the authority and responsibility for the day-to-day operations and management of the district into the hands of three assistant

superintendents. In response to the concerns, the central administration structure was changed to increase the responsibility, authority and leadership of the superintendent position. In interviews, school board members recognized the stability brought to the district as a result of these changes.

Despite the positive benefits associated with these changes, the administrative structure creates an excessive number of direct reports for some positions and establishes inappropriate reporting lines between staff for others. For example, the number of direct reports to the superintendent exceeds the span of control or “rule of thumb” of six to eight employees for a supervisor. The CISD superintendent has 12 direct reports. The superintendent also receives monthly reports

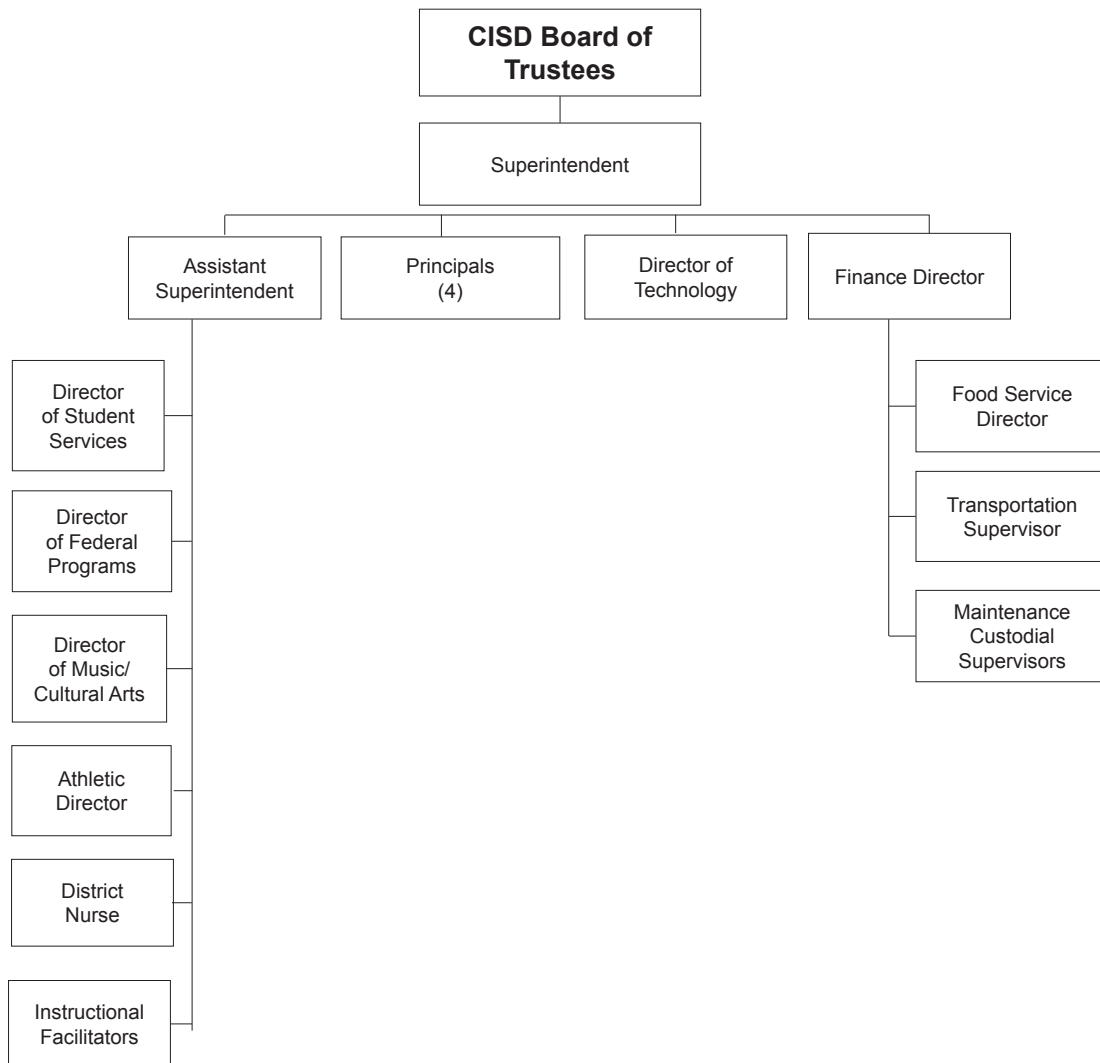
from the Director for the Special Education Co-op of which Cotulla ISD is a member. Additionally, there is an inappropriate alignment of functions among administrators with few significant functions assigned to the Assistant Superintendent.

CISD should revise the district organizational chart and restructure roles and responsibilities to improve the district's accountability for student performance, financial operations, and support service effectiveness. As part of the revision process, the district should consider existing reporting relationships, including the number of employees each manager supervises, and take into account the skills, management style, and statutory responsibilities involved.

This restructuring should take into consideration the factors that lead the district to revise its organizational chart in April 2011 to ensure continuity of purpose between the current and anticipated organizational structure. This change will serve to restructure district roles and responsibilities, improve the district's operational effectiveness, and create improved accountability for student and district performance. **Exhibit 2-5** presents the proposed organizational structure, which clarifies relationships and provides a clear understanding of the lines of authority:

- Reducing the span of control for the Superintendent from 12 direct reports to seven. The proposed structure leaves the Assistant Superintendent, Principals,

**EXHIBIT 2-5
PROPOSED CISD ORGANIZATION**



SOURCE: CISD Central Office, February 2011.

Director of Technology, and Finance Director under the superintendent's direct control to create balance of responsibilities between the Superintendent, Assistant Superintendent, and the Finance Director.

- Assigns the curriculum and special programs to the Assistant Superintendent to more closely reflect the position's responsibility for curriculum; and

The Board of Trustees should approve and direct the superintendent to implement the reorganization.

This recommendation can be implemented with existing resources.

COMMUNICATION (REC. 12)

CISD lacks meaningful two-way communication between central administration and other district stakeholders. There is a general perception among campus administrators and teachers that central administration is unwilling to consider other opinions and does not collaborate or seek input on the implementation of districtwide initiatives prior to mandating their use. This limits the ability of the district to effectively implement new initiatives.

INTERNAL COMMUNICATION

In interviews, campus administrators frequently mentioned that central administration does not seek their input on large issues facing the district or other key functions such as the budget, facility planning, or curriculum from campus staff. These individuals are uniquely situated to provide a perspective on the impact these issues will have at the campus level and provide recommendations on how to address the situation. For example, campus administrators cited having little input into the expenditure of budgeted funds designated for their campuses.

Directives and educational initiatives are mandated from central office with no input, and subsequently little to no buy-in from campus level staff responsible for implementing these programs. Additionally, a large number of campus administrators and teachers indicated that they frequently cannot obtain information from central office even when requested repeatedly and questioned the value central office places in their opinion on educational initiative and strategies they are asked to implement. This has exacerbated a perception among campus staff that central office administrators do not respond well to negative critiques about such things as mandated educational strategies. Several board members also confirmed a general lack of

communication between the superintendent, teachers, and campus level administrators.

The lack of effective dialogue and collaboration between the central office and its school campuses has created a measure of dissention, low morale, fear of reprisal and job loss, and diminished trust among and between central and campus administrators.

EXTERNAL COMMUNICATION

CISD presents few opportunities to garner substantive input on decision-making issues such as district budgeting and facilities planning from parents, local citizens, and other district stakeholders.

The review team conducted a community focus group and numerous interviews amongst faculty, staff, and board members to examine the district's process for soliciting input from the CISD stakeholders. While members of the focus group agreed the district calendar was adequate and allowed sufficient time for input, they stated that parents and community members would like to have more awareness of and input into the areas of curriculum, budget, and facilities planning. This perception amongst the community was confirmed by similar statements made by several members of the Board of Trustees indicating that they do not feel there is an appropriate level of involvement afforded the community, staff, and campus administrators with regard to their input on important governance, planning, and budget issues.

Exhibit 2-6 presents school review survey responses from parents, teachers, administrators, professional staff, and auxiliary staff regarding their ability to provide input to the district's decision-making process. When asked about the ability of parents, citizens, students, faculty, staff, and the board to participate and provide input into facility planning, 49.7 percent of respondents believe it's poor or below average, while 55.7 percent of respondents feel the ability of the public to provide sufficient input during the budget process is poor or below average. In addition, 43.6 percent of respondents believe the effectiveness of site-based budgeting in involving principals and teachers in the budget process is poor or below average.

It is the responsibility of school district central administration to set the broad scope and vision of the district by establishing policies, creating procedures, and instituting strategies and programs specifically designed to improve the district's educational quality. While acting within this leadership capacity, it is also necessary that a measure of respect and

**EXHIBIT 2-6
CISD SURVEY RESPONSES**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
Ability of the parents, citizens, students, faculty, staff, and the board to participate and provide input into facility planning.						
Parents	15%	24%	35%	15%	2%	9%
Teachers	23%	42%	8%	15%	2%	10%
Professional Staff	11%	39%	22%	17%	0%	11%
TOTAL	18%	34%	21%	16%	2%	9%
The effectiveness of site-based budgeting in involving principals and teachers in the budget process.						
Parents	15.6%	22.2%	37.8%	8.9%	4.4%	11.1%
Teachers	32.7%	26.5%	18.4%	14.3%	0.0%	8.2%
Administrators	28.6%	42.9%	0.0%	14.3%	14.3%	0.0%
Professional Staff	11.1%	16.7%	44.4%	11.1%	0.0%	16.7%
Auxiliary Staff	0.0%	28.6%	42.9%	0.0%	14.3%	14.3%
TOTAL	20.3%	23.3%	27.1%	11.3%	3.0%	11.3%
The ability of the public to provide sufficient input during the budget process.						
Parents	15.2%	43.5%	23.9%	4.3%	0.0%	13.0%
Teachers	34.7%	28.6%	20.4%	4.1%	0.0%	12.2%
Administrators	28.6%	42.9%	14.3%	0.0%	14.3%	0.0%
Professional Staff	5.6%	44.4%	16.7%	5.6%	0.0%	27.8%
Auxiliary Staff	0.0%	28.6%	28.6%	0.0%	14.3%	28.6%
TOTAL	19.6%	36.1%	19.6%	3.8%	1.5%	19.6%

NOTE: Totals may not equal 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

consideration be provided to the individuals responsible for implementation of these programs. Failure to do so results in lack of staff buy-in leading to halfhearted program execution. This can ultimately reduce that program or strategy's overall effectiveness and intended positive impact.

It is also incumbent upon campus staff and administrators to recognize the responsibility central administration has to lead the district. This means being receptive to changes directed from central administration and making a good faith effort to implement them despite individual concerns that these strategies may not be the best course of action.

CISD should develop communication procedures that would increase the opportunity for district stakeholders to provide meaningful input into the decision-making processes of key district initiatives.

To encourage effective two-way internal communication, CISD should institute monthly staff meetings with campus personnel to give central administration the opportunity to present information on the district's decision-making issues and obtain staff input. These staff meetings would provide an

opportunity for staff concerns to be expressed and acknowledged by central administration. Further, campus administrators should be provided monthly summarized budget information allowing them to manage district initiatives on their campuses.

To encourage greater external communication, the superintendent and Board of Trustees should work together to create a positive relationship with the community by advertising and holding public forums on all major policy issues in order to solicit input. Accessibility of the superintendent amongst parents, business leaders, staff, and community groups to discuss CISD issues and policies, gather community input on important issues, and assess public satisfaction with the district's operations are key to obtaining input from district stakeholders.

The superintendent should conduct community meetings on major policy issues and address specific issues and concerns. The superintendent should seek, document, and report to the board about the public's satisfaction with opportunities for community input to the district. In addition to input

solicited, decisions made should be communicated with those involved with CISD to keep all parties well informed of the district's operations.

Weekly campus newsletters, quarterly district newsletters, public announcements of school board meetings and agenda, in addition to the district website and numerous communications sent to parents provide substantial opportunity for the district to publicize and invite input to important district issues. Participation by the superintendent and hosting of public forums to discuss major policy issues will provide another opportunity for input from parents, teachers, staff, and members of the community.

This recommendation can be implemented with existing resources.

INFORMATION TRANSPARENCY (REC. 13)

CISD does not have a records management process that easily or timely provides information to requestors, which can affect perceptions of district accountability to its stakeholders. In the process of developing a cohesive vision and message for CISD, the superintendent centralized information management, but did not prioritize the development of procedures for distribution. As a result, parents, taxpayers, and other stakeholders cannot easily obtain public information despite a district goal of increasing communication and despite clear board policies on accessing public information.

The Texas Public Information Act (PIA) makes information collected and maintained by governments available to the public, unless the information meets an exception. Release of confidential information has criminal penalties, as well as serves as a reason for removal from office. In addition to the PIA, school districts must also maintain records under other confidential records laws such as the Family Educational Rights and Privacy Act (FERPA).

Under the PIA, information is presumed to be public if the governmental entity does not request an Attorney General's Opinion within 10 days of the request. However, the governmental entity must promptly provide information that is clearly public, providing notice to the requestor when the public information will be available if additional time is needed to produce the information. The notice of the date and time the information will be available must be provided within 10 days of the original request. The PIA recognizes the balance between the public interest and the district's need

to accomplish its business by regulating standing requests, repetitive requests, and voluminous requests.

The PIA is triggered by a written request. The requestor can mail, fax, e-mail, or hand deliver the request, although the method of the request can affect an organization's response. If an individual submits a request in writing for documents or data maintained by the district, the request does not have to refer to the PIA, because the PIA applies to the request. CISD board policy specifies the positions responsible for compliance with the PIA. The board has designated the superintendent as the public information officer and has designated department heads as agents of the superintendent in responding to requests.

CISD has a form for making public information requests. The form includes a place for the date written, the information requested, requestor signature and contact information, the name of the employee accepting the request and the date received. This is the minimum amount of information needed to initiate the process. The form does not request information that would help the district more easily determine how to respond to the request. For example, the form does not ask the requestor what format is desired, or if there is a preference for viewing the information on site before requesting copies.

It is important that the district information request processes address the differences between PIA requests and intra and intergovernmental requests for information. For example, during the school review many requests were made in writing for information. In some cases, the information was not provided timely, or at all. The review team was sympathetic to the additional work placed on district employees during the review, but the failure to provide information timely blurs the line between a public information request and the legislatively authorized information requests of the review team. If the review team requests were determined to meet the requirements of a request under the PIA, any confidential records requested would be presumed public.

The request of a governing body for the records of a governmental entity is not a request under the Public Information Act. It is a request pursuant to the authority of the office, relative to the duties of the office. It is an important distinction. Where the public does not have a right to require government to research, analyze, create information, or share confidential data in response to a request, the governing body may compel information that would otherwise be protected by the PIA or other law from public view. Should

the governing body or other authority receive information in its official capacity it is responsible for maintaining confidentiality or other privileges.

The consequences for violating open government laws are significant. Texas Government Code Section 552.352 makes dissemination of confidential information a crime punishable by fine of not more than \$1,000 and up to six months in jail. This section also defines the release of confidential information as official misconduct.

CISD should clarify the process for school board or other authorized requests for information, identify employees responsible for answering records requests and train them in the requirements of the Public Information Act. The board should agree upon a process to distinguish official requests by the board, or a member of the board, from a request made by a board member in his or her capacity as a private citizen. For example, the procedure may be that all requests by a board member are official unless otherwise specified in writing. The board may also want to be notified as a group of all individual member requests in order to monitor the need for additional staff or other resources to meet the workload. The procedure might also include that the employee receiving the board request acknowledge receipt with the projected date the information will be available, or the reason it will not be provided. A timeline for providing internal information that is in keeping with timelines for providing public information will avoid an argument that the information was covered by the PIA. If there is any question whether request for non-public information is a request under the PIA, the district should call the Attorney General's open government hotline or legal counsel.

The district should ensure employees and administrators have been trained on the requirements of the Public Information Act, as well as other confidentiality laws that pertain to school district information. Training resources are readily available on the Internet. The Attorney General's Office provides free training on the Public Information Act through its website, and there are various FERPA tutorials with general information about the Act.

The website should also include directions for making a records request, with basic information about the process or a link to the Attorney General's Office public information page. The website should also have a link to an updated district form, which asks sufficient information for the district to provide timely information in the desired format.

Since information requests are time sensitive, the superintendent should provide at least one other employee with access to the superintendent's email account for purposes of receiving information requests when the superintendent is unavailable. As an alternative, the district may create an email address for the position of public information officer such as www.publicinformationofficer@cotulla.org and task several employees with responsibility for regularly checking the email and notifying the superintendent of requests. The district should provide the email and fax number for public information requests on its website to reduce the potential for requests to the wrong location.

Since onsite work, the district has taken steps to improve its information transparency. The district has created an email account to direct all Public Information/Open Records Requests to a single location. A webpage has also been designated with an email link and district form for faxed requests. This account is checked by the Webmaster and Superintendent's Secretary on a daily basis to ensure timely responses.

This recommendation can be implemented with existing resources.

BOARD PACKETS (REC. 14)

Board meeting agendas prepared by the administration and presented to the board for review and approval do not contain appropriate summarized information for board members to make informed business decisions.

Boards have the power and authority over a range of topics and as such they have an obligation to make the best decisions possible when it comes to the education and welfare of students and the expenditure of public funds. The basis for all decisions is good explanation and financial data.

The superintendent and board secretary indicated that board packets are always generated and emailed or hand delivered to each school board member within 72 hours of regularly scheduled board meetings. However, interviews among board members indicated the follow problems with board packets received:

- Board packets are not distributed on time, despite being electronic;
- Board packets contain hundreds of pages of financial information each month, and there is not enough time to review them before the school board meetings;

Agendas contain item numbers and item names, but often lack adequate descriptions of pending issues and cost-justification data. Board members often must engage in additional discussions during the board meeting to get the necessary data to make informed decisions.

Most of the school board members interviewed indicated concern with the board packets received. If board packets are not accompanied by adequate support material to justify the recommendation, it may lead to one of the following, the last of which being a frequent occurrence at CISD:

- Members are left to take an educated guess;
- Members remain silent in order to not seem uninformed; or
- Members and district administrators get into long discussions about the merit of the recommendation, unnecessarily extending the board meetings.

Exhibit 2-7 shows the total number of pages in school board packets over the course of the 2010 school board meetings. This record supports the anecdotal perspectives obtained from school board member interviews. Packet sizes ranged from 173 to 444 pages with an average of 274 pages.

Recommendations made to the board for action should include a rationale for the action including a cost-benefit analysis, name of the vendor (if applicable), start/end date,

**EXHIBIT 2-7
NUMBER OF BOARD PACKET PAGES
SCHOOL BOARD MEETINGS DURING 2010**

BOARD MEETING	NUMBER OF BOARD PACKET PAGES
January 18, 2010	255
February 15, 2010	240
March 29, 2010	315
April 26, 2010	248
May 17, 2010	265
June 21, 2010	310
July 26, 2010	444
August 16, 2010	242
September 20, 2010	264
November 1, 2010	344
November 15, 2010	187
December 13, 2010	173
TOTAL	3,287
AVERAGE	274

SOURCE: CISD Technology Director, February 2011.

and fiscal information including one-time and/or recurring charges.

Rather than presenting the board members with a large packet identifying all individual receipts and disbursements for a month, which could mean hundreds of pages of unnecessary information, district staff should analyze and present monthly financial and operational information to the board in an easily understood format. This packet should be distributed to board members with enough time for the board members to have the opportunity to thoroughly review the document. Summary information should provide comparisons of budgeted revenues and expenditures to year-to-date revenues and expenditures. The Finance Director should use this information to project the district's actual financial position at the end of the year.

The Finance Director should prepare a report of the district's cash position that shows the current balance and the projected receipts and disbursements to the end of the year. Narrative information should explain the district's current financial condition and what has caused variances between the district's budget and actual revenues and expenditures. The district's budget should be updated with the most current information available. Adjustments should be made to the budget as soon as data indicates that the amounts budgeted for expenditures will be exceeded or when budgeted revenues will not be received. This will allow the district to make financial decisions on current information. **Exhibit 2-8** presents the components of an ideal summary of financial data the CISD should provide in board packets to members of the board each month. This list of components includes some documentation that is currently being provided to school board members within the packets they receive prior to each board meeting.

This recommendation can be implemented with existing resources.

SUPERINTENDENT EVALUATION (REC. 15)

The CISD superintendent's performance evaluation lacks specific performance measures. This results in a highly subjective review with wide ranges of performance scored by individual board members.

CISD Policy BJCD (LOCAL) governs the Superintendent's evaluation and specifies that the instrument used by the school board to evaluate the superintendent shall be based on the Superintendent's job description as located in CISD Policy BJA (LOCAL). These duties are organized by function

**EXHIBIT 2-8
CISD BOARD PACKET
MONTHLY FINANCIAL REPORT**

REPORT NAME	DESCRIPTION	REPORT COMPONENTS
Budget vs. Actual	Compares actual revenue and expenditures to budget	Actual revenues and expenditures to date Projected revenues and expenditures to year-end Variance Explanation/Summary
Cash Flow (General Fund)	Summarizes the district's cash position	Beginning balance Receipts during month Expenditures for month Additional encumbrances Ending balance
General Fund Balance	Summarizes the district's general fund	Beginning general fund balance Changes during the period Projected ending general fund balance Target general fund balance
Investment Report	Summarizes the district's investments and interest earnings.	Name of account Beginning Balance Interest Earned Ending Balance
Extraordinary Items	Presents any non-budgeted items	Description of item Purpose of item Function Impact on general fund balance

SOURCE: LBB Review Team, March 2011.

into three overarching categories: Educational Leadership, District Management, and Board and Community Relations. Within each broad category are subcategories with more specific duties:

- Educational Leadership
 - Instructional Management
 - Student Services Management
 - Staff Development and Professional Growth
- District Management
 - Facilities and Operations Management
 - Fiscal Management
 - Human Resources Management.
- Board and Community Relations
 - Board
 - Community

An effective means of providing focus and direction to a school district leadership team is a well-conceptualized and well-developed evaluation process. Texas Education Code Section 21.354 requires a school district to conduct an annual written evaluation of each administrator's performance

utilizing the appraisal process and performance criteria recommended by the Texas Commissioner of Education or an alternative process and performance criteria appropriately adopted by the district's Board of Trustees. The administrator's evaluation process, including the criteria for evaluation, the timeline, and the instrument, must be conducted through the use of a written evaluation instrument. The evaluation instrument should be cooperatively developed and reviewed in advance of the evaluation so that the district and its administrators can prepare for and benefit from the evaluation process.

According to the Texas Association of School Boards (TASB), a successful superintendent evaluation process begins with clear expectations, performance standards, and timelines agreed to by the team of superintendent and the Board of Trustees.

Before conducting the appraisals, each appraiser must be trained in appropriate personnel evaluation skills related to the locally established criteria and process. Texas Administrative Code 150.1022(c) establishes minimum criteria for the administrator's evaluation process. Evaluation criteria include:

- Instructional management
- School or organization morale

- School or organization improvement
- Personnel management
- Management of administrative, fiscal, and facilities functions
- Student management
- School or community relations
- Professional growth and development
- Academic excellence indicators and campus performance objectives
- School board relations (for superintendents only)

Whether a district chooses to use the commissioner-recommended appraisal process or develops its own, the administrators' formal evaluation should mirror the goals, objectives, and expectations of the district.

CISD should incorporate specific measurable performance standards into the superintendent's performance evaluation. The board should hold the superintendent responsible for a target fund balance, a balanced budget, and targets for operating expenditures per student and the percentage of operating expenditures spent on instruction. The superintendent should also be held accountable for academic performance, such as school ratings, student pass rates on state mandated testing, student attendance, and Public Education Information Management System reporting.

CISD should consider evaluating the superintendent's performance on each criteria using one of the following four ratings:

- exceeding expectations;
- proficient;
- below expectations; and
- unsatisfactory

This recommendation can be implemented with existing resources.

PLANNING FOR ENROLLMENT AND PROPERTY VALUE GROWTH (REC. 16)

CISD has not developed a strategic plan that anticipates upcoming decisions that will result from changes in property tax revenue and student enrollment due to the current boom in the oil and gas industry.

The recent discovery of large shale reserves in South Texas has had and continues to have a significant impact on property value and economic development in these regions. La Salle County sits at the heart of these reserves with Cotulla, in particular, already seeing dramatic changes.

One of the consequences of the boom anticipated by Cotulla ISD includes an increase in student enrollment due to oil and gas workers bringing their children with them. This could impact the district's need for such things as additional buses, classroom space or facilities, teachers, and educational programs. The district, whose enrollment has declined slightly over the last few years, is beginning to experience this growth. For 2010–11, CISD saw an increase in its student enrollment of 2.7 percent from the 1,178 students in the previous year.

Another significant consequence of the oil boom is dramatic increases in the appraised property value within the district, and correspondingly large increases in property tax revenue. The relative wealth of a school district is measured by its taxable value of property.

As shown in **Exhibit 2-9**, CISD's wealth per student has increased considerably since the 2005–06 school year. This is due, in part, to decreases in student enrollment coupled with relatively stable property values. If the district's appraised property value continues to climb, the district could face classification as a property wealthy district per Texas Education Code, Chapter 41. The state requires Chapter 41 school districts to send a share of local tax dollars to the state as a part of the equalization of wealth provisions stipulated by law.

Chapter 41 districts may select from the following options to achieve the equalized wealth level:

- consolidation with another district;
- detachment of territory;
- purchase of average daily attendance credit;
- education of nonresident students; or
- tax base consolidation with another district.

These options may be exercised singly or in combination. Once districts decide which option(s) they intend to exercise, each district must annually notify TEA of its intention and submit an agreement or contract outlining how the district will fulfill that option.

CISD should conduct a comprehensive assessment of the impact that the oil boom will have on student enrollment and property values. This should include contacting other school districts that have experienced the challenges that have come with previous Texas oil booms, such as Midland ISD, to learn about the challenges they experienced, the decisions they were faced with, and the district's response to these challenges.

Based on the comprehensive assessment, CISD should develop an integrated long-range strategic plan that addresses the decision points and anticipated challenges identified from the assessment. This should include a projection for student enrollment and the overall financial and operational implications of Chapter 41 status the district could incur. The Finance Director and the superintendent, in a collaborative effort involving input from teachers, administrators, parents, and members of the community, should ensure that the strategic plan is purposely integrated with the annual budget development process and ultimately be presented to the board for review and approval.

This recommendation can be implemented with existing resources.

**EXHIBIT 2-9
CISD ENROLLMENT AND PROPERTY VALUE PER STUDENT
2005–06 TO 2009–10**

SCHOOL YEAR	ENROLLMENT	VALUE PER STUDENT
2009–10	1,178	\$339,950
2008–09	1,196	\$341,300
2007–08	1,219	\$347,806
2006–07	1,226	\$357,425
2005–06	1,247	\$277,355

SOURCE: TEA, AEIS Reports, 2006 through 2010.

VOLUNTEER PROGRAM (REC. 17)

CISD does not have an effective volunteer program that encourages participation by community members.

The district employs Parent Involvement Aides at each campus and has implemented extensive efforts to maintain attendance and work cooperatively to keep parents involved in the daily educational activities of their children. However, CISD is not able to determine if these efforts have had their intended effect since volunteer participation is not recorded at the district level.

The most recent District Improvement Plan made available to the review team for school years 2010–12 identifies Goal 6 as improving two-way communication between the district and the community to foster a positive climate. The Action Plan for this goal lists nine strategies with associated measurements. A majority of these goals focus on encouraging greater parental involvement; however the plan is silent on increasing volunteer activity in the district. Only one of these strategies specifically focuses on community involvement: Strategy Number 7 “Communicate special invitations to community for school events.” The summative performance measure for this strategy is “increase in community support for school event,” an ambiguous objective that cannot provide a quantifiable measure of the district effectiveness in meeting the strategy's goal.

Each Campus Improvement Plan contains the goals located in the District Improvement Plan and provides a list of activities and/or strategies the campus will use to meet the district's goals. For some campuses, this includes a record of the number of volunteers for the last two school years. **Exhibit 2-10** shows how each Campus Improvement Plan has elaborated on District Improvement Plan's Goal 6 from the standpoint of community involvement. While some campuses have recorded the number of volunteers, this has not been consistent across the district. Additionally, neither of the elementary campuses contained strategies that specifically targeted community members. The only strategies listed that focused on volunteer opportunities were through the high school and middle school site based decision making committees.

Anecdotal information was also obtained through on-site interviews and follow-up questions by the review team. Campus administrators and teachers reported poor volunteer participation and assistance for school programs.

Exhibit 2-11 presents school review survey responses from teachers, administrative support staff, and parents on the availability of volunteers at CISD schools. When asked to respond to a survey statement that the school has plenty of volunteers to help with student and school programs, 50 percent of teachers, over 42 percent of professional staff, and over 41 percent of parents respondents felt the availability of volunteers was poor or below average.

**EXHIBIT 2-10
CAMPUS IMPROVEMENT PLANS
DISTRICT GOAL 6
COMPARISON OF COMMUNITY INVOLVEMENT COMPONENTS**

CAMPUS	STRATEGIES THAT TARGET COMMUNITY INVOLVEMENT	NUMBER OF VOLUNTEERS	
		2008-09	2009-10
Cotulla High School	9. Communicate special invitations to community for school events & PTO 10. Establish SBDM committee and train parents and community members on roles and responsibilities 11. Incorporate Veteran’s Day and other community celebrations into school events.	None Listed	None Listed
Newman Middle School	2. Maintain SBDM committee and train parents and community members on roles and responsibilities	5	12
Ramirez Burks Elementary		None Listed	32
Encinal Elementary		None Listed	2
			None Listed

SOURCE: CISD, February 2011.

**EXHIBIT 2-11
CISD SURVEY RESPONSES**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
Survey statement: “The availability of volunteers at all schools to help with student and school programs.”						
Parents	15%	26%	26%	20%	2%	11%
Teachers	15%	35%	25%	10%	2%	13%
Professional Staff	16%	26%	26%	16%	0%	16%
TOTAL	15%	30%	26%	15%	2%	13%

NOTE: Totals may not equal to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

CISD should appoint the campus Parent Involvement Aides as the volunteer coordinator for each campus. The additional responsibilities associated with this could include the following:

- Ensuring campus volunteer opportunities are being communicated throughout the year on the campus and district’s website, on-campus bulletin boards, and school marquees. A special focus should be made at the beginning of the school year as this time presents the greatest possible exposure to parents of volunteer activities available at the district and the individual campuses;
- Tracking both the number of volunteers at the campus and the number of volunteer hours accrued by volunteer program/activity. This could be done through a timesheet maintained at each campus office;

- Managing volunteer applications and forwarding background check requests to central office staff who oversee the district’s background checks; and
- Creating volunteer recognition opportunities that would honor parents and community members that contribute significant volunteer time to the campus.

CISD should modify the Parental and Community Involvement section of the District Improvement Plan to provide a more quantitative measure of the district’s effectiveness in meeting volunteer strategy goals. This should include annual goals such as yearly parental volunteer targets for the number of people volunteering at each campus and district wide and total service hours accrued with each specific program having a targeted number of volunteer hours. This should include an annual summary of each campus’ use and total number of volunteer hours presented to the Board of Trustees.

Other options the district may consider to encourage greater volunteerism within the district include:

- Holding a volunteer orientation session at the beginning of each school year which communicates the various opportunities available with the district, where these volunteers would be most needed, and

would train volunteers on campus procedures and policies that the volunteers would need to follow; and

- Extending invitations to civic groups for volunteer events which the group may have interest.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2011-12	2012-13	2013-14	2014-15	2015-16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
10. Obtain additional guidance for governance issues from external authorities and implement self-policing guidelines to encourage teamwork.	(\$4,800)	(\$4,800)	\$0	\$0	\$0	(\$9,600)	\$0
11. Revise the district organizational chart and restructure roles and responsibilities to improve the district's accountability for student performance, financial operations, and support service effectiveness.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12. Develop communication procedures that would increase the opportunity for district stakeholders to provide meaningful input into the decision-making processes of key district initiatives.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13. Clarify the process for school board or other authorized requests for information, identify employees responsible for answering records requests and train them in the requirements of the Public Information Act.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14. Analyze and present monthly financial and operational information to the board in an easily understood format.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
15. Incorporate specific measurable performance standards into the superintendent's performance evaluation.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
16. Conduct a comprehensive assessment of the impact that the oil boom will have on student enrollment and property values.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
17. Appoint the campus Parent Involvement Aides as the volunteer coordinator for each campus.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS	(\$4,800)	(\$4,800)	\$0	\$0	\$0	(\$9,600)	\$0

CHAPTER 3

FINANCIAL MANAGEMENT

COTULLA INDEPENDENT SCHOOL DISTRICT

CHAPTER 3. FINANCIAL MANAGEMENT

Financial managers must ensure that a school district receives all available revenue from local, state, and federal government resources and that these resources are spent in accordance with law, statute, regulation, and policy to accomplish the district's established priorities and goals. Asset management ensures the district's cash resources and physical assets are managed in a cost-effective and efficient manner; identifies, analyzes and reduces risk to the district's assets and employees through insurance and safety programs; and ensures the district complies with bond covenants and that outstanding bonds pay the lowest interest rate possible. Purchasing management provides districts with quality materials, supplies, services and equipment in a timely manner at the lowest price.

FINANCIAL OUTLOOK

According to the 2009–10 Academic Excellence Information Systems (AEIS), in 2008–09, All Funds, the district received 47.5 percent of revenue from the state, 37.8 percent from local taxes, 11.1 from the federal government, and 3.6 percent from other local and intermediate sources.

CISD's total actual expenditures for All Funds in 2008–09 were \$26,072,126 with per pupil actual operating expenditures of \$11,366. The district invested 47.4 percent

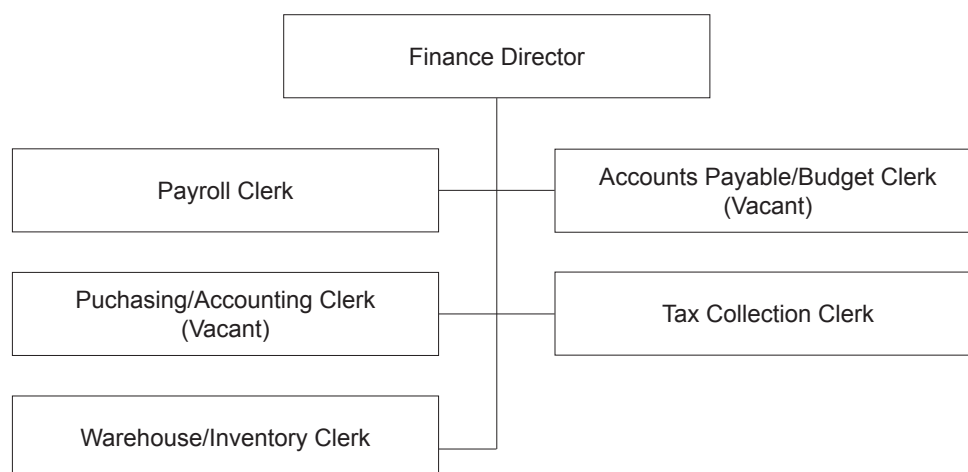
of actual operating expenditures on instruction compared to an average of 58.0 percent by the state.

FINANCIAL MANAGEMENT ORGANIZATION

The Finance Director reports to the superintendent and is responsible for financial management in Cotulla Independent School District (CISD), supported by a payroll clerk, accounts payable/budget clerk, purchasing/accounting clerk, tax collection clerk and warehouse/inventory clerk. The accounting/purchasing clerk and accounts payable/budget clerk positions were vacant at the time of the review team's visit. The Finance Director is also responsible for transportation and food service in the district. The organization of the Finance Department is presented in **Exhibit 3-1**.

Additionally, the Finance Director is responsible for oversight of the department, including budgeting, financial reporting, cash management, bonds, bid preparation and advertising for bids. The payroll clerk is responsible for processing payroll, validating time sheets, monitoring compensatory time and payroll tax payments. The accounts payable/budget clerk is responsible for maintaining purchase orders, payment of invoices, reconciling credit card billings for payment, executing check runs and filing contracts.

EXHIBIT 3-1
CISD FINANCE DEPARTMENT ORGANIZATION
2010–11



SOURCE: CISD, Finance Director, February 2011.

The purchasing/accounting clerk is responsible for purchasing, receipt of centralized activity funds, posting to the accounting system and reconciling travel reimbursements. The tax collection clerk is responsible for tax collections, monthly tax reports, property tax questions and disbursing tax collections to other governmental entities. The warehouse/inventory clerk is responsible for central receiving, maintaining inventories and printing for the district.

CISD provides direct deposit for employees with 80 percent of employees participating. Although their main depository bank does not offer direct deposit, the district has a contract with another bank for direct deposit.

DISTRICT TAXES AND PROPERTY VALUES

CISD taxable property values have increased 15 percent from 2005–06 to 2009–10. The district has seen and will see an increase in property values due to the petroleum exploration that is occurring within the district over the next several years. CISD believes the property value growth will be significant. As the district’s property wealth increases, the district has the potential to be determined a “property wealthy” district and therefore classified as a Chapter 41 district. If that occurs, the district will be required by law to share their local tax revenue with other property poor school districts. A detailed explanation regarding Chapter 41 and CISD’s ability to fall within this classification is located in the District Organization and Management chapter of this report. **Exhibit 3-2** presents the taxable property values and tax rate for this period.

The district adopted a Maintenance and Operation (M&O) tax rate of \$1.17 per \$100 property valuation and an interest and sinking (I&S) rate of \$0.26 per \$100 property valuation for 2010–11.

CISD collects taxes for the City of Cotulla, the Wintergarden Groundwater Conservation District and itself. The district charges the other entities a one percent fee for collecting their taxes. The tax clerk is bonded as required. CISD collected \$6,088,243, including penalty and interest, of CISD M&O and I&S taxes in 2009–10 and expended less than one percent on the tax office, net of appraisal district fees.

ASSET AND RISK MANAGEMENT

The district invests excess funds with its depository bank and two investment pools. The investments comply with the Public Funds Investment Act (PFIA) and board policies. The superintendent and Finance Director are the investment officers of the district and have received the training required by the PFIA. All of the district’s cash and certificates of deposit with its depository banks were fully collateralized by a combination of pledged securities and FDIC insurance as of August 31, 2010. The district invests in investment pools that were rated AAA and AA+ by Standard & Poor’s. **Exhibit 3-3** presents the district’s cash and investments for all funds as of August 31, 2010.

The district insures against loss for real and personal property, liability, school professional legal liability, crime and vehicle loss or damage at an annual cost of \$81,919. The district also insures itself for workers’ compensation claims through a

**EXHIBIT 3-2
CISD TAXABLE VALUES AND TAX RATE**

DESCRIPTION	2005–06	2006–07	2007–08	2008–09	2009–10
Taxable Values	\$345,977,183	\$432,972,349	\$419,616,581	\$406,664,222	\$397,741,008
Total Tax Rate	\$1.555	\$1.555	\$1.4921	\$1.4921	\$1.4921

SOURCE: Texas Education Agency, CISD Audited Financial Statement 2009–10.

**EXHIBIT 3-3
CISD CASH AND INVESTMENTS
AUGUST 31, 2010**

DESCRIPTION	2009–10
Demand Deposits	\$844,443
Investment Pools	\$2,216,003
Short-term Certificates of Deposit	\$656,377
Long-term Certificates of Deposit	\$5,230,372
TOTAL	\$8,947,195

SOURCE: Texas Education Agency, CISD Audited Financial Statement 2009–10, February 2011.

partially self-funded plan; contributes to health insurance for its employees; provides parents with access to student accident insurance; and provides employees with access to a variety of employee funded insurance options. The district oversees textbooks centrally.

The district has two outstanding bond issues, one Qualified Zone Academy Maintenance Tax Notes (QZAMTN), one maintenance tax note and one loan. The bond issues are payable from the debt service fund supported by I&S taxes and the tax notes and loan are payable from the general fund supported by M&O taxes. **Exhibit 3-4** presents the type, interest rate, original amount and amount outstanding at August 31, 2010 for the long-term debts.

The 2007 bonds were for facilities construction and renovation and the 2010 bonds were to refund for savings the district's 1998 bonds. The Loan Star loan was for upgrading the district's heating and air conditioning systems; the 2007 notes were for repair and renovation of facilities, purchase of school buses and purchase of technology; and the 2008 QZAMTN was for renovations and equipment.

PURCHASING AND WAREHOUSING

CISD maintains a small warehouse that is used for storage of district records, central receiving and printing. The warehouse mainly acts as a receiving location and does not have a large inventory of supplies and materials for campuses and departments. The warehouse does maintain a small inventory of janitorial supplies for the district. The warehouse/inventory clerk is responsible for receiving, delivering and notifying accounts payable of the receipt of materials and supplies purchased by the district. The warehouse/inventory clerk is also responsible for printing some materials for the district.

The district uses purchasing cooperatives and state contracts to ensure compliance with the purchasing laws and board

policies. Requests for competitive sealed proposals were done for the major construction projects that were completed with the funds provided by the 2007 bond issue. The proposals were advertised and required the responding contractor to provide all necessary disclosures and required documents.

CISD oversees textbooks centrally and takes an inventory of all textbooks annually. The individual campuses are accountable for the textbooks issued to them.

FINDINGS

- CISD's inadequate financial management, lack of internal controls and transparency has resulted in several discrepancies or unexplained financial or fiscal issues in the district.
- CISD does not have adequate internal controls on financial processes, increasing the risk of error and misappropriation.
- CISD does not make financial information readily available to staff, the board and the community, which helps to foster a lack of trust regarding the operations of the district.
- CISD does not have a fund balance policy that defines the appropriate level of undesignated, unreserved fund balance in the general fund and has reduced its fund balance each of the last three years.
- CISD does not have a process to monitor and adjust state revenues throughout the fiscal year to ensure accuracy.
- CISD does not use a cash flow forecast to monitor its cash position and ensure that adequate funds are available to meet the district's cash requirements.
- CISD does not have an internal timeline for the completion of items to be prepared by the district for

EXHIBIT 3-4 CISD LONG-TERM DEBT AUGUST 31, 2010

TYPE	INTEREST RATE	ORIGINAL AMOUNT	AMOUNT OUTSTANDING
Unlimited Tax School Building Bonds 2007	4.50% – 5.25%	\$14,895,000	\$14,160,000
Unlimited Tax Refunding Bonds 2010	2.00% – 5.00%	\$2,475,000	\$2,345,000
Loan Star Loan	3.00%	\$467,056	\$251,941
Maintenance Tax Notes 2007	4.34% – 4.50%	\$1,500,000	\$926,000
QZAMTN 2008	0.50%	\$8,000,000	\$6,970,000

SOURCE: Texas Education Agency, CISD Audited Financial Statements 2009–10, February 2011.

the annual audit due to the Texas Education Agency at year's end.

- CISD does not approve purchase and travel requisitions in a timely manner.
- CISD does not have an updated business procedures manual to provide guidance for business office staff and other district employees or continuity in the event of employee turnover.
- CISD does not follow board policy CFB (LOCAL) by incorrectly identifying numerous items below the capitalization threshold of \$5,000.
- CISD did not use any competitive procurement process to obtain professional services.

RECOMMENDATIONS

- **Recommendation 18: Cooperate with the Texas Texas Education Agency (TEA) regarding the recommendation of the Legislative Budget Board that TEA conduct an investigation of Cotulla ISD under the provisions of the Texas Education Code §39.056, On-Site Investigations, and §39.057, Special Accreditation Investigations.**
- **Recommendation 19: Develop internal control processes related to expenditures and management of district finances and periodically audit to ensure procedures are followed.**
- **Recommendation 20: Take immediate steps to address the board, public and staff perceptions regarding financial performance and public participation in the budget process and post required information on the district's website.**
- **Recommendation 21: Adopt a fund balance policy for the general fund that sets a target of two months operating expenditures to be maintained in the undesignated, unreserved fund balance of the general fund.**
- **Recommendation 22: Monitor and adjust the state revenue budget during the fiscal year.**
- **Recommendation 23: Establish a cash flow forecasting process and monitor cash position to ensure adequate funds are available.**
- **Recommendation 24: Establish a timeline to ensure the annual financial audit is completed and**

filed with TEA before the 150th day after the end of the district's fiscal year.

- **Recommendation 25: Establish a goal for requisition approval of three days or less.**
- **Recommendation 26: Update the business procedures manual.**
- **Recommendation 27: Follow the board policy for capitalization of assets to include assets of \$5,000 and above.**
- **Recommendation 28: Use a RFP or RFQ process to obtain professional services.**

DETAILED FINDINGS

FINANCIAL MANAGEMENT (REC. 18)

CISD's inadequate financial management, lack of internal controls and transparency has resulted in several discrepancies or unexplained financial or fiscal issues in the district.

While onsite, finance department administration was unable to provide the review team basic financial documentation such as:

- List of all bank accounts by type and use, including bank account statements for January 31, 2011 for each account;
- List of all certificates of deposit and balances for January 31, 2011;
- List of all pledged securities as of January 31, 2011; and
- Copies of investment reports for 2010–11.

The inability to provide the requested information in a timely manner gives rise to questions about the district's ability to manage their finances. Failure to respond to requests for information from the public may lead to a loss of trust in the administration.

Moreover, the review team was told by various administrators that one of the biggest reasons for some of the department's breakdowns were due to financial staff turnover over a course of time and in particular in 2009–10. Turnover of finance positions in small districts such as CISD impact the ability of the district to manage day-to-day operations and can lead to delays in purchasing and financial reporting. However, turnover in the financial management staff was not solely

responsible for the condition of the district's finance department.

The district had a director between 2003 to 2007, another director between 2007–09, an interim director, and hired the current director in November in the 2010–11 school year, following the adoption of the budget for 2010–11 and before the completion of the 2009–10 annual audit. This placed the director in the position of not knowing the assumptions used for the budget nor having detailed knowledge of financial transactions for completing the district's audit. In addition, the purchasing/accounting clerk and accounts payable/budget clerk positions were both vacant at the time of the review team's visit in February 2011. The payroll clerk and the tax collection clerk, however, have been in their respective positions for at least three years.

It appears that the finance department's lack of monitoring to ensure rules, regulations, policies, and best practices are followed in other financial areas and district operations such as purchasing, asset and risk management, transportation and food service has impacted these areas as reported elsewhere in this chapter in greater detail and in other chapters of this report. The following are examples of some of the discrepancies within the department and other operational areas in the district that have been impacted:

- delays in providing financial information and or statements to the board lead to one frustrated board member and the review team filing open records requests to the district;
- lack of preparing (year ended August 31, 2010) financial reports comparing actual to budgeted expenditures (per the Annual Financial and Compliance Report's Schedule of Findings);
- lack of internal controls or safeguards in several areas eventually leading to alleged fraudulent activity in the student activity funds area;
- frequent delays in obtaining goods (supplies/testing materials for counselors) and services (staff development travel requests) for campuses and staff;
- lack of contract management;
- inability to accurately calculate state revenues for the last three years with budgeted state revenue exceeding actual revenues;
- inability over the last three years (2006–07 to 2008–09) to receive higher ratings in the Financial

Integrity Rating System of Texas (FIRST). The 2009–10 audit was significantly delayed placing the district in jeopardy of possibly receiving a substandard rating;

- lack of a fund balance policy that permitted significant reductions in district fund balance from 2007–08 to 2009–10;
- lack of documented operating procedures (outdated business procedures manual);
- inability to post financial information on the district's website in a timely manner as required by law;
- lack of an explanation of the methodology for large expenditures provided to the Food Services Manager on utilities charges to the program to manage an operation that has repeatedly run a deficit;
- lack of inventory controls that maximizing risks for the districts assets;
- lack of a competitive procurement process; and
- lack of a cash flow forecast to monitor its cash position resulting in less than two months operating expenditures in 2009–10.

Additionally, the review team surveyed parents, students, teachers, and staff to obtain input on district operations, including the ability of administrations to effectively manage the district's budget.

As shown in **Exhibit 3-5** regarding the effectiveness of site-based budgeting involving principals and teachers; nearly 72 percent of administrators and 60 percent of teachers answering the survey felt the process was poor to below average.

Components of financial management that determine its effectiveness include: staff, reporting, planning, technology, accounting, and auditing. CISD has some of the pieces for an effective financial department, but has not fully assembled all of the necessary components.

For example, an effective staff member has the education and experience required for assigned tasks; is trained in the business operations of the district; is updated on changes to laws, rules and regulations that control school business operations; and is assigned to duties that strengthen internal controls. CISD staff members appear to have the education and experience necessary for their positions. The business

**EXHIBIT 3-5
CISD SCHOOL REVIEW SURVEY RESULTS
FEBRUARY 2011**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
The effectiveness of site-based budgeting in involving principals and teachers in the budget process.						
Parent	15.6%	22.2%	37.8%	8.9%	4.4%	11.1%
Administrators	28.6%	42.9%	0.0%	14.3%	14.3%	0.0%
Auxiliary	0.0%	28.6%	28.6%	14.3%	14.3%	14.3%
Professional Support Staff	11.1%	16.7%	44.4%	11.1%	0.0%	16.7%
Student	13.5%	15.3%	40.0%	9.4%	0.6%	21.2%
Teacher	32.7%	26.5%	18.4%	14.3%	0.0%	8.2%

NOTE: Percentages may not add to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

office also has a budget of \$2,100 for training for 2010–11 to maintain necessary skills or address any knowledge shortfalls.

Another essential piece, effective reporting, encompasses the preparation of the budget and actual financial reports for management and for the public, as well as the provision of accurate submissions to the Public Education Information Management System (PEIMS). PEIMS data is used by TEA to report on the district’s financial performance through School FIRST. The district has submitted accurate information to PEIMS, defined as a less than three percent error rate, for the last three years rated by School FIRST. The district received a rating of substandard achievement for 2006–07, but an above standard achievement for 2007–08 and a standard achievement for 2008–09. District administration said the substandard achievement rating was the result of the district’s external auditor erroneously reporting negative unrestricted net assets for the year ended August 31, 2007.

Effective financial management requires an effective planning process that uses a documented method for budget preparation, evaluates prior year budget and actual expenditures for reasonableness, and anticipates changes that will impact the budget, involves campus and department staff, engages the community and supports the goals and objectives of the district. A review of the district’s budget preparation manual for 2009–10 revealed a calendar of events; detailed instructions for budget managers to use in preparation of the budget; instructions for accessing prior year and current year budget and actual amounts; and a how-to for the input of requested budget data into the financial information system.

An effective accounting function, critical to the smooth operations of a school district, includes documented procedures for all activities, reviews and evaluates activities for efficiency, complies with the TEA Financial Accountability System Resource Guide (FASRG), and monitors the district’s financial activities. The district has an outdated business procedures manual that is posted on their Internet site. This manual is the only set of business procedures accessible to employees and the community. CISD uses the Texas Association of School Boards (TASB) to ensure business related policies comply with laws, rules and regulations, but the only review of accounting activities noted was the annual financial audit and no material instances of noncompliance with the FASRG were noted.

An effective accounting function also includes an external audit to test its procedures and internal controls, and ensures financial statements fairly represent the financial condition of the organization. Effective external auditing requires a firm that is experienced and trained in school district auditing, complies with generally accepted auditing standards and is licensed by the Texas State Board of Public Accountancy. The audit firm engaged by CISD for the past three years meets all three of these characteristics and received a peer review rating of pass on their most recent quality review. The district received an unqualified opinion on their financial statements on August 31, 2010. An unqualified opinion is the best opinion a public accountant can give out of three possible opinions: unqualified, qualified, or adverse.

Technology has now replaced the accounting ledgers and well-bound books of the past. Effective technology creates documents necessary to manage the district’s finances, controls expenditures through the budget, enhances productivity, and is accessible by a broad range of users.

CISD uses the Regional Service Center Computer Cooperative (RSCCC) business information system to manage financial data and transactions. The district receives technology support from the Regional Education Service Center XX (Region 20). The RSCCC system is compliant with the FASRG and meets the needs of the district. CISD is in the process of upgrading to the Texas Enterprise Information System (TxEIS) from the Texas Computer Cooperative (TCC) through Region 20. Campus principals, campus secretaries, budget managers, department staff and central office staff have access to the system.

Although the district has the framework for an effective department, the district still lacks critical internal controls. The lack of internal controls is aggravated by the district's turnover in department management. Consistent turnover results in a lack of institutional knowledge about district finances, policies and procedures, and places district staff in a position of perpetual adjustment for the learning curve of each new director.

The advent of a new director does provide the district with the opportunity to develop an effective financial management function under new departmental leadership. If the district does not use this opportunity, the lack of updated procedures, budgetary controls over the transfer of funds, financial policies, inventory controls, and other basic internal controls places the district at continued risk for error, misapplication, and defalcation.

CISD should ensure the district's financial management function is effective by maintaining components that work well now and taking steps to improve those functions that are ineffective. The improvement process should include:

- Selecting candidates with the education and experience necessary for open positions;
- Providing training for new employees on the district's financial procedures;
- Communicating the importance of internal control procedures to management and staff, which includes posting policies and procedures on the district website for easy access;
- Assigning staff to duties that strengthen internal controls;
- Consistently presenting monthly budget and actual financial statements to the board and public;
- Creating a fund balance policy;

- Determining and addressing the reasons for the perceived ineffectiveness of the budget process; and
- Monitoring the financial activities of the district.

Additionally, Cotulla ISD should cooperate with the Texas Education Agency regarding the recommendation of the Legislative Budget Board that TEA conduct an investigation of CISD under the provisions of the Texas Education Code §39.056, On-Site Investigations, and §39.057, Special Accreditation Investigations. The TEA investigation should review the actions and environment leading to the discrepancies or unexplained financial or fiscal issues in the district.

CISD should share information with TEA as they conduct the investigation. If properly approached, the TEA findings can be a blueprint for district change.

This recommendation can be implemented with existing resources.

INTERNAL CONTROLS (REC. 19)

CISD does not have adequate internal controls on financial processes, increasing the risk of error and misappropriation. An internal control structure is the process or steps taken by an organization to protect its assets against waste or fraud, and is essential to efficient management of operations. The basic elements of a control environment are missing in several financial areas of the district.

The following examples characterize some issues where the district lacks internal controls:

- The district does not have a *process for analyzing the impact of benefits on payroll*, or appropriately recapturing errors made by administration in a paycheck. Employees noted that mistakes in payroll calculation were committed with some frequency. Although much of the calculation is automated, the district makes benefit decisions that create exceptions to the standard calculations. These benefits are not always made with full analysis of the impact. For example, the district offered housing at less than market rates as a recruiting tool. This benefit has tax implications, which was not discussed with the payroll department to determine if payroll taxes needed to be adjusted. If payroll taxes are not appropriately calculated, the employer may bear responsibility for any reporting shortages.

- The district's *purchasing process focuses on compliance with procedures rather than timely delivery of needed items*. The unwieldy process results in staff purchasing from local stores and asking for reimbursement, or making ad hoc purchases through local stores rather than purchasing on a competitively developed contract. In interviews with the review team, teachers said the purchasing process resulting in repetitive denials of purchase orders with no explanation, and late delivery of items well into the school year. Frustration with ineffective processes can result in procedural violations as individuals find ways to obtain the items they need to perform their duties.
- The district's *contracting process lacks operational oversight* from the development of the contract to its execution. For example, in order to address a housing shortage, the district leases unused land to employees for locating mobile housing. A review of a contract for use of district land revealed a contract with a term of 50 years, and ending if the lessee separate from district employment. Additionally, the lease does not specify the location, but requires the district to pay for utilities. A 50 year term requires a commitment well beyond the tenure of most administrative staff. An annual term with automatic review for renewal with each extension of the employment contract may have been equally effective, but the decision to provide the benefit was not connected to the cost of administration.
- Moreover, the *inventory provided by the technology department was not complete*. Some items lacked serial numbers. The list did not reflect assignment to students although students are assigned individual laptops and must agree to be responsible for damage or loss. The list of servers assigned to multiple buildings reached a count over 50, but only 12 servers were identified in the disaster recovery plan. The district was asked to provide basic information for each server regarding the year purchased and its purpose, but could not. The 50 plus servers were identified by serial numbers and should have been easily locatable if the inventory process properly tracked assignments.

Internal controls on financial processes are influenced by an organization's work environment. An organization must create a culture of ethics among staff, which requires setting expectations, communicating those expectations, and supporting the processes that meet expectations. In an

interview, the superintendent noted she wanted employees who live to ethical standards. This is a laudable goal, and the superintendent has taken steps to separate employees who do not act ethically when conducting district business.

In addition to the culture, a control environment requires establishing and maintaining effective control procedures, timely communicating them, and monitoring for compliance. CISD has established procedures, but has not fully applied, communicated or monitored them. For example, procedures establish that travel reimbursements will be made only on original receipts. The procedure does not discuss the submission of original receipts in other purchases. During onsite work, information surfaced that receipts were duplicated and the copies used to obtain improper reimbursements. The requirement of original receipts for all reimbursements, or the occasional audit of payables to ensure originals were submitted can reduce the risk of misappropriation.

Beside the potential for misappropriation, a lack of internal controls can result in lost funding. For example, a failure to comply with requirements for E-rate funding resulted in a request for a return of funds. It is important to remember that the cost of a control should not exceed the benefit. An internal control should be designed to meet an objective, and be balanced against other controls competing for resources.

Establishing and communicating effective control procedures has been hampered by the level of turnover in administration. All campus administrators, some department heads and several central administrators have been replaced at least once in the past five years.

CISD should develop internal control processes related to expenditures and management of district finances and periodically audit to ensure procedures are followed. The Finance Director should identify teachers and administrators willing to serve on a committee to review and update procedures for purchasing, asset management, and other processes that regularly affect staff or for which staff will be held accountable. The administrator responsible for the performance of control processes primarily performed within a single department should update those processes with input from staff. The internal control procedures should be included in the business procedures manual.

This recommendation can be implemented with existing resources.

FINANCIAL TRANSPARENCY (REC. 20)

CISD does not make financial information readily available to staff, the board and the community, which helps to foster a lack of trust regarding the operations of the district.

At the time of the review in February 2011, the board had not received monthly financial reports for the previous two months. One board member was so frustrated over the issue that the board member filed an Open Records Request for information from district staff. Board members also indicated that the size and complexity of the financial information was unwieldy and difficult to use for decision making.

In addition, district staff indicated in interviews that they did not know what expenditure requests would be approved or when the approvals would be made. The Food Services director stated that this was not enough information to manage the financial aspects of the operation. Large expenditures such as utility costs were charged to the food

service fund at year end without explanation as to methodology. This unanticipated charge resulted in an operating deficit for the fund for the year.

Further, the review team surveyed parents, students, teachers, and staff to obtain their perceptions regarding financial management. Survey respondents rated the district's operations based on survey statements for all functional areas of the district. **Exhibit 3-6** presents the respondents' views of the financial reporting in the district, the ability to the community to have input in the budget process and the ability of district management to effectively manage the budget. The majority of respondents rated all three of these areas as poor or below average. More than 50 percent of the respondents ranked the availability and usefulness of the district's financial reports as poor or below average. And less than 15 percent ranked the district's financial reports as good or excellent.

**EXHIBIT 3-6
CISD SCHOOL REVIEW SURVEY RESULTS
FEBURARY 2011**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
The availability and usefulness of the district's financial reports.						
Parent	23.9%	28.3%	26.1%	4.3%	0.0%	17.4%
Administrators	14.3%	42.9%	28.6%	0.0%	14.3%	0.0%
Auxiliary	0.0%	28.6%	42.9%	0.0%	14.3%	14.3%
Professional Support Staff	16.7%	38.9%	22.2%	0.0%	0.0%	22.2%
Student	15.5%	19.0%	36.3%	7.1%	1.2%	20.8%
Teacher	34.7%	28.6%	20.4%	4.1%	0.0%	12.2%
The ability of the public to provide sufficient input during the budget process.						
Parent	15.2%	43.5%	23.9%	4.3%	0.0%	13.0%
Administrators	28.6%	42.9%	14.3%	0.0%	14.3%	0.0%
Auxiliary	0.0%	28.6%	28.6%	0.0%	14.3%	28.6%
Professional Support Staff	5.6%	44.4%	16.7%	5.6%	0.6%	27.5%
Student	11.8%	15.9%	36.5%	10.6%	0.0%	24.7%
Teacher	32.7%	30.6%	18.4%	4.1%	0.0%	14.3%
The ability of the superintendent and administrators to effectively manage the district's budget.						
Parent	26.1%	21.7%	32.6%	4.3%	0.0%	15.2%
Administrators	0.0%	28.6%	28.6%	14.3%	14.3%	14.3%
Auxiliary	0.0%	42.9%	28.6%	0.0%	14.3%	14.3%
Professional Support Staff	22.2%	27.8%	22.2%	16.7%	0.0%	11.1%
Student	15.3%	13.5%	38.2%	11.8%	2.9%	18.2%
Teacher	46.9%	22.4%	12.2%	10.2%	2.0%	6.1%

NOTE: Percentages may not add to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

A majority of the respondents ranked the ability of the public to participate in the budget process as poor or below average with 58.7 percent of the parents, 71.5 percent of the administrators and 63.3 percent of the teachers in that category. Less than 15 percent of the respondents in each category ranked the ability of the public to participate in the budget process as good or excellent.

The rankings regarding the ability of district management to effectively manage the budget varied from a low of 28.6 percent of administrators ranking this process as poor or below average to 69.3 percent of the teachers ranking this process as below or below average. Good or excellent rankings for this process ranged from 4.3 percent for parents to 28.6 percent for administrators.

By not providing timely and accurate financial information the district creates concerns regarding its financial performance, a possible lack of trust and the potential for poor decision making by the board. The lack of transparency in the day-to-day financial operations and delays in processing routine expenditures limits the ability of district staff to manage their own functions and may create perceptions of favoritism.

Finally, the community does not have access to financial information because it is not posted on the district’s website as required by law. The district maintains a website that has some of the required financial information, but most of the information is from 2007 and the most recent information posted is for 2009–10. The Finance Director is responsible for the financial postings to the website. The district converted to a new Internet web page in the summer of 2010 and the superintendent believes that some of the information was lost in the conversion or not moved to the new web page.

School districts are required to post a variety of financial information on their website by various statutes. The inability of the district to post required information also presents compliance and regulatory issues. The purpose of these requirements is to enhance financial transparency for the public. The Internet is a valuable resource used to communicate financial information to the public that, in turn, supports the school district through taxation. **Exhibit 3-7** presents several of the required postings and the code and section of the statute that establishes the requirement. CISD has not complied with these requirements.

By not posting the required financial information, the district risks losing the public trust. The public trust can be built by

**EXHIBIT 3-7
REQUIRED INTERNET POSTINGS
2010–11**

DESCRIPTION	CODE	SECTION
Metered amount and payments for electric, water, or natural gas utility services	Government Code	2264.001(b)
Access to the statements and questionnaires relating to conflicts of interest	Local Government Code	176.009
Proposed maintenance and operations tax rate	Tax Code	26.05(b)
Summary of proposed budget	Texas Education Code	44.0041
Adopted budget	Texas Education Code	39.084

SOURCE: Government Code, Local Government Code, Tax Code and Education Code, March 2011.

not only posting the required financial information, but posting additional information that improves the transparency of the district. Some of these items include the district’s check register, the continuing disclosures required for bond issues, messages from the superintendent concerning the budget process, the FIRST report and monthly financial statements.

Many school districts post the required information and other pertinent information on their Internet websites to provide financial transparency for the public. For example, Quanah ISD posts much of the required information on a single page of their site. In addition to the required information, they post their check register and annual financial report.

The district should take immediate steps to address the board, public and staff perceptions regarding financial performance and public participation in the budget process. The first priority should be to address financial reporting to the board. The superintendent should ensure that current monthly financial reports are provided to the board in the board packet prior to each monthly board meeting and that the format is usable for board decision making.

The business procedures manual recommended in this chapter should clearly set out the steps to be followed in submitting requests for expenditures and reimbursement requests.

The Finance Director should also post the required information on the district website and the superintendent should review the website to ensure the postings are made

monthly. The regional education service centers and professional organizations such as the Texas Association of School Business Officials (TASBO) may help the district obtain information about all Internet postings that are required. Templates are available from these sources to facilitate the postings. In addition to the required postings, the district should post other financial information that would be of interest to the public. Implementing this recommendation will ensure that CISD complies with the law and enhances their financial transparency to the public.

This recommendation can be implemented with existing resources.

FUND BALANCE (REC. 21)

CISD does not have a fund balance policy that defines the appropriate level of undesignated, unreserved fund balance in the general fund and has reduced its fund balance each of the last three years. The general fund's balance has declined \$2.8 million from 2006–07 to 2009–10. CISD also budgeted a reduction in fund balance of \$812,981 for 2010–11.

Fund balance represents the district's reserves—similar to a savings account. These reserves are used by district management and the board for emergencies and/or other expenditures not anticipated at the time the budget was approved. Districts often accrue or build fund balances to pay for large expenditures such as multiple bus purchases that are not affordable in a single year.

In 2006–07, the district borrowed \$1.5 million for the purpose of purchasing school buses, vehicles and technology equipment. Not all the proceeds from the loan were spent during the year and the remainder increased the fund balance in 2006–07. A portion of the decline in fund balance is due to the expenditure of these funds. The remainder of the

reduction is a drawdown of fund balance for operational expenditures that exceeded revenues. **Exhibit 3-8** presents summary financial information for the general fund from 2006–07 to 2010–11.

For 2009–10, the fund balance and cash flow calculation worksheet in the audited financial statements showed CISD was \$879,889 below the optimum fund balance. This calculation uses ending fund balance, designations and reserves of fund balance and estimates of two months average cash disbursements. The superintendent's goal is for the district to have two months of operating expenditures in fund balance, but that goal is not defined in policy. TEA is in the process of modifying the indicators in FIRST to require districts to maintain two months operating expenditures in the general fund. If actual financial results for 2010–11 are reflective of the budget, CISD will not meet the requirements of this indicator.

The Government Finance Officers Association (GFOA) issued a best practice in 2002, revised in 2009, regarding the need for a fund balance policy for the general fund and the identified a recommended amount of unrestricted fund balance for the general fund. The GFOA recommends, "that governments establish a formal policy on the level of unrestricted fund balance that should be maintained in the general fund." GFOA also states, "at a minimum, that general-purpose governments, regardless of size, maintain unrestricted fund balance in their general fund of no less than two months of regular general fund operating revenues or regular general fund operating expenditures."

Many districts have found that it is essential to maintain adequate levels of fund balance to mitigate current and future risks and have adopted fund balance policies. Given the predicted revenue shortfall at the state level for the 2011–13

EXHIBIT 3-8 CISD GENERAL FUND SUMMARY 2006–07 TO 2010–11

YEAR	REVENUES	EXPENDITURES	OTHER SOURCES (USES)	CHANGE IN FUND BALANCE	ENDING FUND BALANCE
2006–07 Actual	\$12,335,796	\$12,234,494	\$1,454,923	\$1,556,225	\$3,756,008
2007–08 Actual	\$12,380,603	\$12,911,224	(\$338,446)	(\$869,067)	\$2,886,947
2008–09 Actual	\$12,166,971	\$12,722,217	(\$96,649)	(\$651,895)	\$2,235,052
2009–10 Actual	\$11,373,798	\$12,737,043	\$107,737*	(\$1,255,508)	\$979,544
2010–11 Budgeted	\$11,990,815	\$12,748,379	(\$55,417)	(\$812,981)	\$166,563

*Includes a prior period adjustment of \$215,772. Without the prior period adjustment, fund balance would have declined by \$1,471,280.

SOURCE: Texas Education Agency, CISD Audited Financial Statements 2006–07 to 2009–10, CISD 2010–11 general ledger report and budget report, February and March 2011.

biennium and the resulting decline in state aid for school districts, these districts are better prepared than districts that have not adopted a policy and maintained an appropriate level of fund balance in their general fund.

CISD should adopt a fund balance policy for the general fund that sets a target of two months operating expenditures to be maintained in the undesignated, unreserved fund balance of the general fund. This fund balance target should guide the budget process for future years until the target is reached. This will provide the district with sufficient funds so that it is prepared for future risks related to funding and unanticipated expenditures.

This recommendation can be implemented with existing resources.

REVENUE BUDGET (REC. 22)

CISD does not have a process to monitor and adjust state revenues during the fiscal year to ensure accuracy. The district did not monitor nor adjust the state revenue budget during the last fiscal year (2009–10) resulting in an operating deficit for the year. For the last three years budgeted state revenue exceeded actual revenues: by \$3.5 million in 2009–10; \$1.2 million in 2008–09; and finally by \$0.9 million in 2007–08. The failure to monitor and adjust state revenue during the fiscal year produced actual financial results that are significantly different from the expected results based on the budget adopted by the district board.

For 2009–10, the failure resulted in a \$1.4 million deficit when the district expected a \$0.5 million deficit. **Exhibit 3-9** presents the original state revenue budget, amended state revenue budget, actual state revenue, the budget variance and deficit for 2005–06 to 2009–10.

In 2009–10, the district budgeted \$9,893,012 in state revenue and actually received \$6,426,757. The Finance

Director could not explain why the budgeted state revenues were overstated, but said the district had used a state aid template to determine the state revenue. Post onsite work, district officials stated that “CISD is currently using the summary of finance templates (for this year and next year) as a tool to monitor (and make adjustments based on actual attendance records) state aid.” While the district used the state template, it is the process of monitoring and adjusting throughout the fiscal year that has not been used in the past. The state aid template estimated revenue at \$7,092,613.

The superintendent said they had budgeted as revenues the discount the district would receive from a proposed technology expenditure covered by the E-Rate program. The E-Rate program provides discounts to school districts based on their poverty level of 20 to 90 percent for qualified telecommunications expenditures. The discounts are sent to the district when the expenditure has been submitted and approved. While it is appropriate to include the E-Rate discount as revenue, the district did not amend the budget when the proposed expenditure was not made.

According to the TEA payment ledger for 2009–10, CISD was allotted \$281,203 from the available school fund and \$6,495,038 from the foundation school program for a total state allotment of \$6,776,241. TEA made downward adjustments to the initial allotments through 2009–10. Had the district checked the payment ledgers and compared these amounts to the budgeted revenue, the district would have been aware early in the year that the state revenue budget was not correct.

Many districts monitor the state revenue budget during the course of the year. Some districts use the state aid template from Regional Education Service Center XIII (Region 13) to estimate revenue for the budget and compare the amount estimated by the Region 13 template to the preliminary

**EXHIBIT 3-9
CISD STATE REVENUE BUDGET
2005–06 TO 2009–10**

YEAR	ORIGINAL	AMENDED	ACTUAL	VARIANCE	OPERATING SURPLUS (DEFICIT)
2005–06	\$0	\$4,681,000	\$5,061,167	\$380,167	\$444,752
2006–07	\$0	\$4,838,747	\$5,280,754	\$442,007	\$101,302
2007–08	\$7,428,901	\$7,428,901	\$6,494,850	(\$934,051)	(\$530,621)
2008–09	\$8,456,848	\$8,456,848	\$7,234,657	(\$1,222,191)	(\$555,246)
2009–10	\$9,893,012	\$9,893,012	\$6,426,757	(\$3,466,255)	(\$1,363,245)

SOURCE: Texas Education Agency, CISD Audited Financial Statements 2005–06 to 2009–10.

allotments from TEA. If a discrepancy exists, these districts determine why by reviewing the summary of finance from TEA with the state aid template. If the discrepancy requires an adjustment in the budget, the adjustment is proposed as a budget amendment for board approval. This ensures that these districts have correctly budgeted state revenues.

CISD should monitor and adjust the state revenue budget during the fiscal year. The review team compared the 2010–11 state revenue in the approved budget to the amount allotted by TEA and found the two amounts to be similar (\$5,688,585 in the district budget compared to \$6,290,235 in the TEA allotment). Even though starting numbers are similar, the district must monitor the budgeted revenue periodically during the year by comparing the state aid template and the most recent summary of finance or payment ledger. This will help ensure the district has budgeted state revenues correctly and gives the district ample time to adjust expenditures, if necessary.

This recommendation can be implemented with existing resources.

CASH FLOW FORECAST (REC. 23)

CISD does not use a cash flow forecast to monitor its cash position and ensure that adequate funds are available to meet the district's cash requirements. The only cash flow forecast the current Finance Director prepared for the district was completed when one of the certificates of deposit in the construction funds matured during 2010–11. The district's cash account balance logs seem to indicate that the district calls the bank intermittently to check on the balance and if it is collateralized. In September 2010 the district called a total of twelve times, October 2010 six times, November 2010 five times and December 2010 three times. While this is a good practice, it does not meet a true cash flow forecast methodology since it only looks at the present and not the

future. Cash flow should be forecasted for at least twelve months from the current month and updated each month. The district has had ample cash available to meet its obligations in previous years; however, CISD also had a significant reduction in fund balance and cash available at the end of 2009–10.

The district ended 2009–10 with less than two months operating expenditures available. **Exhibit 3-10** presents the cash balance, investment balance and due from other funds in the general fund for 2005–06 to 2009–10. Cash and cash equivalents represent demand deposits at the depository bank and deposits with investment pools. Investments are certificates of deposit with the depository bank and can be redeemed with loss of interest on demand. Due from other funds represents receivables from other district funds and are assumed collectible on demand.

The district budgeted expenditures of \$12,803,796 and revenues of \$11,990,815 with a beginning fund balance of \$979,544 for 2010–11. **Exhibit 3-11** shows the cash flow deficit for the first three months of 2010–11, based on expenditures being made equally over the year, state revenues being received as scheduled, and all other revenues, except current property taxes, being received equally over the year. Current property taxes represent actual collections.

Without adequate cash available at the beginning of 2010–11, CISD would have had to borrow cash to cover the cash flow deficit in November 2010. The district's 2010–11 budget forecasts a fund balance of \$166,563 at the end of 2010–11. If all of the projected fund balance represents readily available cash and a cash deficit exists as represented in **Exhibit 3-11** in 2011–12, the district will need to borrow cash to cover expenditures in November 2012.

The board must authorize any borrowing regardless of the source of funds. The funds can be borrowed through a loan

EXHIBIT 3-10 CISD GENERAL FUND CASH AVAILABLE AUGUST 31, 2006 TO AUGUST 31, 2010

AUGUST 31,	CASH AND CASH EQUIVALENTS	INVESTMENTS	DUE FROM OTHER FUNDS	TOTAL
2006	\$1,505,637	\$0	\$387,237	\$1,892,874
2007	\$2,767,009	\$406,555	\$435,005	\$3,608,569
2008	\$289,755	\$1,036,071	\$570,862	\$1,896,688
2009	\$795,967	\$651,380	\$1,077,265	\$2,524,612
2010	\$605,126	\$151,971	\$872,669	\$1,629,766

SOURCE: Texas Education Agency, CISD Audited Financial Statements 2005–06 to 2009–11, February 2011.

**EXHIBIT 3-11
CISD CASH FLOW DEFICIT
2010-11**

SOURCE (USE) OF CASH	SEPTEMBER	OCTOBER	NOVEMBER	CUMULATIVE
Current Tax Revenue	\$0	\$642	\$1,129	\$1,771
Local Revenue	\$8,183	\$8,183	\$8,183	\$24,550
State Revenue	\$1,323,508	\$1,063,623	\$573,756	\$2,960,887
Total Revenue	\$1,331,691	\$1,072,448	\$583,068	\$2,987,208
Expenditures	\$1,066,983	\$1,066,983	\$1,066,983	\$3,200,949
Cash Surplus (Deficit)	\$264,708	\$5,465	(\$483,915)	(\$213,741)

SOURCE: Texas Education Agency, Division of State Funding Payment Schedules for 2010-11, CISD general ledger report, budget report and tax collection reports, 2010-11.

from a bank or through the issuance of tax anticipation notes. While a loan from a bank can be accomplished in a shorter time frame than issuing tax anticipation notes, the interest rate paid on a bank loan is generally higher.

Many school districts use cash flow forecasts to monitor their cash position and ensure adequate funds are available to meet cash requirements. This helps ensure that district management can anticipate the need to borrow funds to meet their financial obligations in advance of the actual need and provides the districts with adequate time to make decisions regarding expenditure reduction or to decide on the borrowing method that will reduce the total cost to the district.

The district should establish a cash flow forecasting process and monitor its cash position to ensure adequate funds are available. The forecast should be for at least twelve months from the current month and should be updated each month. This practice will allow the district to monitor its cash position and ensure adequate funds are available to meet its future cash requirements. Cash flow templates are available from a number of sources, including TEA.

This recommendation can be implemented with existing resources.

APPROVAL OF ANNUAL FINANCIAL AUDIT (REC. 24)

CISD does not have an internal timeline for the completion of items to be prepared by the district for the annual audit due to the Texas Education Agency at years end. Following onsite work by the review team, district officials provided a timeline for year ending August 31, 2010 for the preparation of their annual financial audit report, however, the timeline cited objectives for events that had occurred rather than citing items to be completed by financial department staff in preparation of an annual audit.

CISD did not have its 2009-10 annual financial audit completed in time for the board to approve the audit before the January deadline. The annual financial audits were completed and approved by the end of January of the following year for 2005-06 to 2008-09. The Finance Director said the reason for the audit not being approved until February 2011 was due to employee turnover and the discovery of a fraud in the finance office.

The 2009-10 management letter noted “employee turnover during the year in the Finance Department and other issues encountered by management during year-end fieldwork contributed to the delay of fieldwork and to the timely completion of our report.” In the statement of findings and questioned costs for the year ended August 31, 2010, the audit states, “subsequent to year-end, the district discovered that fraud occurred within the student activity accounts totaling approximately \$15,000. Inquiries of management indicate that periodic reconciliations of cash balances and other activity between the district’s central office and club sponsors were not being performed.”

The audit was not completed and approved by the board until February 2011. Section 44.008(d) of the Texas Education Code (TEC) states “a copy of the annual audit report, approved by the board of trustees, shall be filed by the district with the agency not later than the 150th day after the end of the fiscal year for which the audit was made.” For CISD, the 150th day is in January.

FIRST includes an indicator for timely filing of the annual financial audit with the Texas Education Agency. The indicator states “was the annual financial report filed within one month after November 27th or January 28th deadline depending upon the district’s fiscal year end date (June 30th or August 31st)?” A no answer to this indicator will result in

the district receiving a FIRST rating of substandard achievement.

Section 109.1003(a) (4) of the Texas Administrative Code (TAC) states “the commissioner of education may apply sanctions to a district that is assigned a substandard achievement rating and may require other corrective actions.”

The district should develop a timeline for the completion of items to be prepared for the annual audit to help ensure the district has all the necessary materials ready so as to expedite the process when the audit team arrives for onsite work. The Finance Director should report on progress weekly to the superintendent after the end of the fiscal year to help ensure the annual financial audit is completed and filed with TEA before the 150th day after the end of the district’s fiscal year as mandated by state law.

This recommendation can be implemented with existing resources.

PURCHASE REQUISITIONS (REC. 25)

CISD does not approve purchase and travel requisitions in a timely manner. The district uses financial software to generate requisitions and purchase orders and an electronic travel form to requisition funds for travel. Both systems allow users to input requisitions and automatically route them to the

appropriate approving authority. The superintendent has final approval on any purchase over \$5,000.

The review team received conflicting responses regarding the purchasing process. Some budget managers reported that other than an occasional delay in the approval process they were able to get what they needed in a timely manner. Others, however, indicated that many requisitions were seeing considerable delays in the approval process with several requisitions pending approval for more than a month. When asked to provide documentation of the delays, budget managers provided the review team with examples of requisitions pending approval. District officials explained that the “reason why some requisitions are delayed is due to incorrect coding and procedures that are not being followed.” Further, officials stated that they have to train a lot of budget managers on the basic of budget coding which requires time. **Exhibit 3-12** presents the timeline for several of these requisitions.

The review team reviewed a number of other purchases and determined that the majority were processed in one to five business days before November 2010. Once the purchase requisition is approved, a purchase order is issued for the goods or services. The purchase orders are mailed, faxed or phoned into the vendor. When materials arrive at the district they are delivered to the central receiving function at CISD’s warehouse. The warehouse clerk checks in the materials and

EXHIBIT 3-12 REQUISITION TIMELINES 2010–11

DESCRIPTION OF ITEMS	AMOUNT	DATE INPUT	DATE APPROVED	STATUS DATE
Books	\$720	November 12, 2010	Pending	February 10, 2011
Books	\$88	January 26, 2011	February 10, 2011	
Instructional materials	\$119	January 25, 2011	Pending	February 10, 2011
Office supplies	\$368	January 10, 2011	January 24, 2011	
Office Supplies	\$731	January 19, 2011	February 2, 2011	
Office supplies	\$351	January 18, 2011	February 2, 2011	
Software license	\$445	January 3, 2011	January 24, 2011	
Software license	\$4,450	January 3, 2011	January 24, 2011	
Registration and Travel Request	\$787	December 9, 2010	Pending	February 9, 2011
Registration and Travel Request	\$308	December 10, 2010	Pending	February 9, 2011
Registration and Travel Request	\$308	December 9, 2010	Pending	February 9, 2011
Registration and Travel Request	\$803	December 9, 2010	Pending	February 9, 2011
Registration and Travel Request	\$803	December 9, 2010	Pending	February 9, 2011
Registration and Travel Request	\$803	December 9, 2010	Pending	February 9, 2011

SOURCE: CISD, budget managers, March 2011.

delivers the order to the location of the requestor and sends the receiving copy of the purchase order to accounts payable for payment processing.

The review team surveyed parents, students, teachers, and staff to obtain input on district operations regarding financial management. Survey respondents rated the district's operations based on survey statements for all functional areas of the district. **Exhibit 3-13** presents the respondents views of the purchasing process. The majority of respondents rated the speed and ease of purchasing as poor or below average.

CISD should establish a goal for requisition approval of three days or less. This will provide employees with a benchmark to determine the effectiveness of the purchasing function. The district should provide ample time, potentially at the beginning of each school year, to train new and existing budget managers about appropriate budget coding.

By meeting or exceeding the goal, the purchasing function will build customer satisfaction among employees. Since the process automatically routes the requisition to the appropriate approving authority, approving authorities need to establish times during the day when they will approve purchase requisitions.

This recommendation can be implemented with existing resources.

BUSINESS PROCEDURES MANUAL (REC. 26)

CISD does not have an updated business procedures manual to provide guidance for business office staff and other district employees or continuity in the event of employee turnover.

The CISD business procedures manual is posted on the district's website and is available for employees to use as a

reference guide. The manual contains information about activity funds, payroll, budget process, purchasing, accounts payable, tax office, warehouse/receiving, information technology and safety. The manual also contains extra duty rates, pay rates for substitutes and employee health insurance costs.

A memorandum, included in the posted manual, is addressed to district principals, Site Based Decision Making committees, and department directors. The directives are very general guidelines such as budget transfers requiring the superintendent's signature or that budget amendments must be submitted to the board 14 days prior to the board meeting. There are also procedures for travel such as what items require receipts and which do not. A previous memorandum from 2007 references a more exhaustive set of procedures, but these are not readily available.

The posted business manual is outdated and contains information that was valid for 2007–08. For example, the manual provides for board approval of purchases over \$25,000 and board policy sets the threshold at \$50,000; the manual lists the rate for TRS Care 1 health insurance at \$266 and the 2010–11 rate is \$297; the manual refers to version 12 of the FASRG and the 2010–11 version is 14; and the manual contains many dates for actions applicable to 2007–08.

A more current business procedures manual is especially critical since the district has experienced significant turnover in the business office during the past year. The Finance Director was hired in November 2010, the accounts payable/budget clerk position is vacant and the purchasing/accounting clerk position is vacant. CISD also has a number of new administrators at the central office and campuses.

**EXHIBIT 3-13
CISD SCHOOL REVIEW SURVEY RESULTS
FEBRUARY 2011**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
The ability of staff to quickly and easily purchase needed goods and services.						
Parent	27.3%	22.7%	40.9%	4.5%	4.5%	0.0%
Administrators	14.3%	57.1%	0.0%	0.0%	28.6%	0.0%
Auxiliary	0.0%	42.9%	0.0%	42.9%	14.3%	0.0%
Professional Support Staff	10.5%	21.1%	57.9%	0.0%	0.0%	10.5%
Student	8.3%	8.3%	58.3%	16.7%	0.0%	8.3%
Teacher	40.8%	28.6%	24.5%	6.1%	0.0%	0.0%

NOTE: Percentages may not add to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

The Government Finance Officers Association (GFOA) recommended practice on documentation of accounting policies and procedures states, “A well-designed and properly maintained system of documenting accounting policies and procedures enhances both accountability and consistency. Procedures should be described as they are actually intended to be performed rather than in some idealized form. The resulting documentation also can serve as a useful training tool for staff.”

Many districts update their business procedures manuals as changes occur in policies, procedures and other relevant information. For districts that have their business manuals available online, these updates are not time consuming and do not require the manual to be reprinted and distributed. These districts ensure that the business procedures manual provides guidance for business office staff and other district employees and serves as a useful training tool for new employees.

The district should update the business procedures manual. This will provide a useful training tool for all new employees.

This recommendation can be implemented with existing resources.

FIXED ASSETS (REC. 27)

CISD does not follow board policy CFB (LOCAL) by incorrectly identifying numerous items below the capitalization threshold of \$5,000. The district provided the review team with a listing of capital assets by location and the listings contained numerous items with a cost below \$5,000. Board policy CFB (LOCAL) sets the capitalization threshold at \$5,000. The district tracks these capital assets using a spreadsheet.

In an interview, the Finance Director mentioned that the district’s manual inventory process needed updating and the district was considering purchasing scanners to help with the inventory. The district uses lists containing both capital assets and other items.

The external auditor has recommended the district follow its policy of capitalizing assets with a value of \$5,000 or more. The auditor has also recommended the district maintain a separate listing of items costing less than \$5,000 the district wishes to track due to risk of loss and not record those items in the general ledger. This recommendation has been made in each of the last three audits (2007–08 to 2009–10).

The FASRG states, “for items subject to inventory control (for example, certain low-cost items recorded under supplies and materials), for insurance purposes and because of the risk of theft, the school district should use one of the local optional expenditure codes to provide a reconciling amount to balance total additions to the inventory listing. Items recorded on the inventory listing ... are not General Capital Assets and, accordingly, are not recorded in the general capital asset accounts.”

By not following the board policy for capitalization of assets, the district incorrectly reports capital assets and reports an erroneous amount for depreciation in the financial statements.

The district should follow the board policy for capitalization of assets. The Finance Director should review the capital asset spreadsheets and remove items costing less than \$5,000 and enter those items into a listing for insurance purposes. This will ensure the district is correctly reporting assets and maintaining a list of other assets for insurance purposes.

This recommendation can be implemented with existing resources.

PROFESSIONAL SERVICES (REC. 28)

CISD did not use any competitive procurement process to obtain professional services. The review team requested the requests for proposals (RFP) or request for qualifications (RFQ) for each of these services procured by the district. In response to the request, the district stated “The Request for Proposals issued for all architects, bond counsel, and financial advisors in contract with school districts is not required by policy or law. No documents are available.”

An RFP or RFQ is a competitive procurement method that allows the district to obtain sufficient information to determine the qualifications of a firm that provides professional services. This process also allows the district to negotiate the price of the service. The FASRG states, “competitive proposal procedures are recommended where other procurement procedures are not required according to state or federal rules, laws or regulations, in order to stimulate competitive prices for services.”

Competitive bidding for architectural services is prohibited by section 2254.003 of the Government Code (GC). Section 2254.004(a) of the GC states, “In procuring architectural, engineering, or land surveying services, a governmental entity shall:(1) first select the most highly qualified provider of those services on the basis of demonstrated competence

and qualifications; and(2) then attempt to negotiate with that provider a contract at a fair and reasonable price.”

By not using a competitive procurement method for these professional services, CISD did not create competition for the services in order to receive a good value for the district.

CISD should use an RFP or RFQ process to obtain professional services. This will provide the district with an

opportunity to evaluate the firms’ qualifications and competencies and allow the district to negotiate a fair price.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2011-12	2012-13	2013-14	2014-15	2015-16	TOTAL 5-YEAR (COSTS) SAVINGS	ONE TIME (COSTS) SAVINGS
18. Cooperate with the Texas Education Agency (TEA) regarding the recommendation of the Legislative Budget Board that TEA conduct an investigation of Cotulla ISD under the provisions of the Texas Education Code §39.056, On-Site Investigations, and §39.057, Special Accreditation Investigations.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
19. Develop internal control processes related to expenditures and management of district finances and periodically audit to ensure procedures are followed.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
20. Take immediate steps to address the board, public and staff perceptions regarding financial performance and public participation in the budget process and post required information on the district’s website.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
21. Adopt a fund balance policy for the general fund that sets a target of two months operating expenditures to be maintained in the undesignated, unreserved fund balance of the general fund.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
22. Monitor and adjust the state revenue budget during the fiscal year.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
23. Establish a cash flow forecasting process and monitor its cash position to ensure adequate funds are available.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
24. Establish a timeline to ensure the annual financial audit is completed and filed with TEA before the 150th day after the end of the district’s fiscal year.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
25. Establish a goal for requisition approval of three days or less	\$0	\$0	\$0	\$0	\$0	\$0	\$0
26. Update the business procedures manual.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
27. Follow the board policy for capitalization of assets to include assets of \$5,000 and above.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
28. Use a RFP or RFQ process to obtain professional services.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 4

HUMAN RESOURCES MANAGEMENT

COTULLA INDEPENDENT SCHOOL DISTRICT

CHAPTER 4. HUMAN RESOURCES MANAGEMENT

A school district's human resources are the key to successful operation. As a service industry, frequently the largest percentage of a district's budget is personnel. Its financial and operational structure is dependent on the effective acquisition and maintenance of this resource.

Human Resource functions within Cotulla Independent School District (CISD) are managed by the superintendent, the Assistant Superintendent, and the Assistant Superintendent's Secretary.

Exhibit 4-1 compares CISD operating expenditures to the average for school districts in Regional Education Service Center XX (Region 20), and with the average for school districts statewide. CISD is located in Region 20, which covers a portion of Texas from San Antonio to the border.

The all funds category in **Exhibit 4-1** includes expenditures from all available resources such as federal and state special purpose funding, and bond funding. Compared with its region and the state, CISD has lower payroll costs as a percent of all expenditures. CISD spends 70 percent of general funds on payroll costs, while Region 20 schools, on average, spend 84.3 percent of general funds on payroll costs.

COMPENSATION AND BENEFITS

CISD has adopted salary schedules for all employees. These schedules are separated into four classifications: teachers, administrative/professional, clerical/paraprofessional, and auxiliary staff. While teachers, counselors, librarians, and nurses are on a state mandated salary schedule that increases with each additional year of experience, the remainder of

district staff is on a pay scale that provides a minimum and maximum salary range for similar job functions.

For purposes of comparison, three school districts were selected as peers for this review: Freer, Jim Hogg, and Quanah Independent School Districts (ISDs). Jim Hogg and Freer Independent School Districts are located in the same geographic area as Cotulla ISD. Quanah Independent School district is located near the Texas Panhandle.

Exhibit 4-2 compares district compensation for educational staff to its peers, region, and state.

CISD pays its teachers less on average than its geographic peers Freer and Jim Hogg ISDs, its educational region, or the state. The average pay for professional support staff among the peer districts is very close, with a spread of only \$167. CISD's pays its professional support staff \$4,590 more on average than does Quanah ISD, the closest peer in average salaries for professional support staff. CISD pays both its campus administrators and its central administrators less on average than Region 20 or the other districts in the state of Texas. In **Exhibit 4-2**, only Freer ISD had a lower average salary for central administrators than CISD.

These numbers reflect an averaging of actual salaries paid, and actual salaries paid reflects the skills, education, and years of experience of staff. For example, CISD has a larger percentage of teachers with less than 5 years of experience at 41.9 percent, than others within Region 20 at 36.4 percent. Since teachers are paid in part on years of experience, newer teachers will make less. A higher percentage of lower salaries can affect the overall average.

EXHIBIT 4-1
CISD DISTRICT EXPENDITURES BY CATEGORY
ALL FUNDS
2009-10

EXPENDITURE CATEGORY	CISD PERCENT OF EXPENDITURES GENERAL FUND	CISD PERCENT OF EXPENDITURES ALL FUNDS	REGION 20 PERCENT OF EXPENDITURES ALL FUNDS	STATE PERCENT OF EXPENDITURES ALL FUNDS
Payroll Costs	70.0%	38.5%	59.8%	59.4%
Other Operating Costs	21.3%	14.8%	14.4%	15.8%
Debt Service	6.9%	7.9%	8.4%	8.9%
Capital Outlay	1.8%	38.8%	17.3%	15.9%

NOTE: Percentages may not add to 100 percent due to rounding.

SOURCE: Texas Education Agency, Academic Excellence Indicator System (AEIS) 2009-10.

**EXHIBIT 4-2
AVERAGE ACTUAL SALARIES PROFESSIONAL STAFF
CISD COMPARED TO PEER DISTRICTS
2009–10**

DISTRICT	NUMBER OF PROFESSIONAL STAFF	TEACHERS	PROFESSIONAL SUPPORT	CAMPUS ADMINISTRATION	CENTRAL ADMINISTRATION
Quanah ISD	64.2	\$41,089	\$50,807	\$63,669	\$102,341
Freer ISD	88.9	\$45,851	\$50,640	\$51,454	\$70,149
Jim Hogg ISD	103.0	\$49,376	\$50,782	\$73,318	\$93,802
Cotulla ISD	118.1	\$45,052	\$55,397	\$63,933	\$83,741
Region 20	33,401.9	\$50,072	\$57,288	\$70,249	\$88,889
State	416,978.9	\$48,263	\$56,470	\$70,209	\$87,446

NOTE: Average refers to salaries.

SOURCE: Texas Education Agency, AEIS 2009–10.

The Texas Education Agency sets minimum salaries for classroom teachers, librarians, counselors, and nurses based on years of experience. The state minimum salary is based on a 10-month contract providing at least 187 days of service. School districts can supplement the state minimums, and can provide other types of compensation such as additional pay for additional duties. CISD compensation for this group includes the state base salary, a district supplement above base, and stipends for various additional duties.

Exhibit 4-3 compares classroom teacher salaries offered by CISD to the state minimum salary schedule. As shown in **Exhibit 4-3**, CISD pays more than the state minimum to attract and retain its teaching staff.

When employees receive a benefit, it may be considered income, and is therefore taxable. The district provides an employer contribution toward employee healthcare in the amount of \$333. The district provides additional compensation to some positions such as vehicle allowances, smart phones, or housing assistance.

Exhibit 4-4 shows the perception of CISD staff on the district’s ability to provide competitive salaries and adequate health benefits. When the school review team asked teachers if salaries were competitive with the market, 6.1 percent of those surveyed believe it to be poor, 28.6 percent said district pay was below average, 28.6 percent said it was average, 22.4 percent of respondents said it is good, and 10.2 percent believe it is excellent. At the lower end of district pay, a majority of auxiliary staff, 71.4 percent, believe the district is below average or poor in its competitiveness. A slight majority of professional staff, 52.6 percent, also believe the competitiveness of their pay is below average or poor.

**EXHIBIT 4-3
COMPARISON OF COTULLA TEACHER SALARIES
TO STATE MINIMUM SALARIES
2010–11**

YEARS OF EXPERIENCE	STATE MINIMUM SALARY	COTULLA SALARY	PERCENT OVER MINIMUM
0	\$27,320	\$39,300	43.9%
1	\$27,910	\$39,500	41.5%
2	\$28,490	\$39,700	39.3%
3	\$29,080	\$39,950	37.4%
4	\$30,320	\$40,250	32.8%
5	\$31,560	\$40,650	28.8%
6	\$32,800	\$41,150	25.5%
7	\$33,950	\$41,650	22.7%
8	\$35,040	\$42,250	20.6%
9	\$36,070	\$42,905	18.9%
10	\$37,040	\$43,935	18.6%
11	\$37,960	\$44,905	18.3%
12	\$38,840	\$45,425	17.0%
13	\$39,650	\$46,305	16.8%
14	\$40,430	\$47,115	16.5%
15	\$41,160	\$47,895	16.4%
16	\$41,860	\$48,625	16.2%
17	\$42,510	\$49,325	16.0%
18	\$43,130	\$49,975	15.9%
19	\$43,720	\$50,595	15.7%
20	\$44,270	\$51,185	15.6%
21	\$44,270	\$51,735	16.9%
22	\$44,270	\$51,935	17.3%
23	\$44,270	\$52,135	17.8%

SOURCE: CISD Salary Schedule 2010–11, Texas Education Agency Minimum Salary Schedule 2010–11.

**EXHIBIT 4-4
CISD SALARY AND HEALTH INSURANCE SURVEY RESPONSES
FEBRUARY 2011**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
The competitiveness of the district salaries with similar positions in the job market.						
Administrators	0.0%	14.3%	42.9%	28.6%	14.3%	0.0%
Teachers	6.1%	28.6%	28.6%	22.4%	10.2%	4.1%
Professional staff	26.3%	26.3%	47.4%	0.0%	0.0%	0.0%
Auxiliary staff	14.3%	57.1%	14.3%	0.0%	14.3%	0.0%
The ability of the district's health insurance package to meet my needs.						
Administrators	14.3%	0.0%	57.1%	28.6%	0.0%	0.0%
Teachers	2.0%	8.2%	40.8%	36.7%	6.1%	6.1%
Professional staff	0.0%	5.3%	42.1%	31.6%	15.8%	5.3%
Auxiliary staff	0.0%	0.0%	57.1%	14.3%	14.3%	14.3%

NOTE: Percentages may not add to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

STAFFING

When making staffing decisions, CISD looks first at the 22:1 student to teacher ratio in the core learning areas, and then at the paraprofessional staffing for special needs students. While the state does not mandate staffing minimums for counselors, recommendations vary widely so CISD applies a 300:1 student to counselor ratio in determining counseling staffing.

The district student population has remained stable over the years, although the recent oil and gas boom in the area may change growth dynamics. **Exhibit 4-5** compares changes in student population between 2007–08 and 2010–11.

District losses and gains were distributed throughout the grades, with sixth grade having the greatest change at almost a 44 percent increase in students. Excluding the large drop in Grade 2, the largest drop in student population were in high school grades 9, 10, and 11. Grade 12 saw an increase of 6.3 percent over four years, but the 68 students in the class of 2011 began as 95 students in grade 9. **Exhibit 4-6** compares CISD's staffing mix to that of its peer districts, the state, and within Region 20.

At 44.9 percent CISD has the lowest percentage of teaching staff, and at 32.5 percent, the highest percentage of auxiliary staff among its peers, its region, or the state. The percentage of administrators to total staff is higher among the South Texas peers, although at 3.4 percent, the average for the region is lower than the state's 3.8 percent.

TEACHER SALARY COMPARISON

Exhibit 4-7 compares teacher salaries by years of experience to that of CISD. Although CISD increased its salaries for beginning teachers to \$39,300 in 2010–11, district salaries are below the state and region average. While salaries are not the only factor in successful recruitment and retention strategies, they are a factor.

EMPLOYEE RELATIONS

The review team surveyed CISD staff and asked them to rate district personnel processes. Surveyed teachers believe the district is below average or poor in identifying and rewarding excellent performance at 59.1 percent. The percentage of professional staff that believes the district is below average or poor in effectively identifying and rewarding excellence is 57.9 percent. The percentage of administrative staff that believes the district is below average or poor in identifying and rewarding excellence is 57.2 percent.

**EXHIBIT 4-5
COMPARISON OF STUDENT POPULATION BY GRADE
2007-08 TO 2010-11**

GRADE	STUDENT POPULATION COUNT				PERCENTAGE (LOSS) OR GAIN
	2007-08	2008-09	2009-10	2010-11	
Pre-Kindergarten	74	74	86	86	16.2%
Kindergarten	88	95	89	87	(1.1%)
Grade 1	88	90	89	101	14.8%
Grade 2	127	91	86	86	(32.3%)
Grade 3	88	109	91	90	2.3%
Grade 4	93	84	103	94	1.1%
Grade 5	98	99	81	104	6.1%
Grade 6	57	80	95	82	43.9%
Grade 7	72	62	85	98	36.1%
Grade 8	87	82	64	85	(2.3%)
Grade 9	95	87	85	62	(34.7%)
Grade 10	104	77	75	76	(26.9%)
Grade 11	84	91	65	72	(14.3%)
Grade 12	64	76	83	68	6.3%
TOTAL*	1,219	1,197	1,177	1,191	(2.3%)

*Early Education figures not included in totals.

SOURCE: Texas Education Agency Student Enrollment Totals by District, Reports 2007-11.

**EXHIBIT 4-6
COMPARISON OF CISD STAFFING TO PEERS
2009-10**

DISTRICT	TOTAL STAFF	PERCENT TEACHERS	PERCENT AUXILIARY STAFF	PERCENT EDUCATIONAL AIDES	PERCENT CENTRAL AND SCHOOL ADMINISTRATORS
Quanah ISD	110.8	51.8%	22.1%	19.9%	3.2%
Cotulla ISD	118.1	44.9%	32.5%	12.0%	4.9%
Freer ISD	147.6	46.0%	28.2%	11.5%	8.1%
Jim Hogg ISD	175.0	48.4%	29.1%	12.0%	4.7%
Region 20	54,735.1	47.9%	29.2%	9.8%	3.4%
State	659,820.6	50.5%	27.0%	9.8%	3.8%

SOURCE: Texas Education Agency, AEIS 2009-10.

**EXHIBIT 4-7
COMPARISON OF AVERAGE TEACHER SALARIES BY YEARS OF EXPERIENCE
2009-10**

EXPERIENCE	COTULLA ISD	JIM HOGG ISD	FREER ISD	REGION 20	STATE OF TEXAS
Beginning Teachers	\$28,611	\$37,295	\$37,500	\$42,441	\$41,165
1-5 Years	\$40,350	\$39,711	\$40,228	\$45,189	\$43,527
6-10 Years	\$44,669	\$44,940	\$46,224	\$47,779	\$46,149
11-20 Years	\$47,794	\$51,667	\$50,944	\$51,761	\$50,153
Over 20	\$53,824	\$59,506	\$54,335	\$60,974	\$58,427
Turnover Rate	20.7%	8.6%	20.9%	11.7%	11.8%

SOURCE: Texas Education Agency, AEIS, 2009-10.

ACCOMPLISHMENT

- CISD is systematically organizing and automating its data to provide for greater efficiency and a more effective use of staff time.

FINDINGS

- CISD does not have a recruitment and retention process that consistently attracts and develops employees that can meet district performance expectations.
- CISD's personnel function is not organized to effectively deliver a full range of human resource services.
- CISD has installed an electronic timekeeping system for employee accountability, but does not have a process for correcting problems encountered in implementation.
- CISD does not apply its evaluation process to all positions throughout the district, resulting in different expectations for staff accountability.

RECOMMENDATIONS

- **Recommendation 29: Develop a comprehensive recruitment process that incorporates strategies for timely attracting employees with desired characteristics, provides for timely contact and follow up, and includes post-hire programs that develop the desired skills and commitment in recruits.**
- **Recommendation 30: Reassign administrative personnel tasks from the superintendent to the appropriate level of staff and provide staff with written guidelines for how the process should be administered.**
- **Recommendation 31: Activate the electronic error correction process in the time clock software, and provide employees with the rules for use, making the process of compliance easier on reporting employees and on administrative staff.**
- **Recommendation 32: Implement an evaluation process for non-educator positions that includes a simple, but clear evaluation form, and to ensure compliance, evaluate supervisors on the fair and timely use of the process.**

DETAILED ACCOMPLISHMENT

EMPLOYEE RECORDS

CISD is systematically organizing and automating its employee files to provide for greater efficiency and a more effective use of staff time. CISD keeps its employee files in locked, fire retardant cabinets inside a locked storage area. Keys to the storage area are limited and the storage is located in the superintendent's suite of offices. When reviewing employee files, the review team noted employee files were generally well organized. Most files included a checklist of items incident to creating an employee file and similar documents were located consistently in the files.

District records are not all stored in a central location. Departments throughout the district create and maintain files. The review team did not review school-based files, but school administrators said that at the end of the year, they forward files to central administration.

For those teachers not holding a lifetime certificate (issued prior to September 1, 1999) the Texas Administrative Code requires training in order to maintain licensing. CISD purchased software for creating and maintaining electronic training records. This software automates what had frequently been a time-consuming, paper process. Teachers needing verification that training requirements have been met can request a list from the database.

DETAILED FINDINGS

QUALITY RECRUITMENT AND RETENTION (REC. 29)

CISD does not have a recruitment and retention process that consistently attracts and develops employees that can meet district performance expectations. The district has not linked the type of employee it wishes to recruit with successful recruitment strategies. As a result, the district fills vacant positions but frequently does not keep the newly hired teachers beyond their probationary period.

PRE-HIRE RECRUITMENT

The hiring process begins with identification of hiring needs. In addition to new positions added and employee resignations, the district must decide if expiring contracts will be renewed. Educators are on contracts, and contracting processes are regulated by the state. In order to meet required notification timelines, school districts should start evaluating contract extensions early enough to provide notice of non-renewal 45 days before contracts terminate at the end of the school year.

CISD’s contract renewal process begins with a spreadsheet that lists contracts up for renewal and the teacher certifications, skills or other information that may be helpful to the principal when making the recommendation to renew. The principal places his or her recommendation on the spreadsheet, attaches employee evaluations, and the packet is returned to central administration. The superintendent reviews the materials and decides whether to accept the recommendation or ask for more support information. Final recommendations are made to the board and notices are provided to those employees whose contracts will not be renewed. In 2010, the CISD board heard recommendations for contract renewal on January 18th.

The district posts openings on its website, and may also list with professional organizations that host job boards. Interested candidates must complete a district application online. If a vacancy occurs during the school year, principals can review the electronic applications and schedule interviews. The district does not have a standard set of baseline interview questions to assess if a candidate possesses the minimum professional and personal skills expected by the district. Each applicant completes each step, which extends the time between the point of first contact and the final decision.

The district uses several sources to recruit educator staff. Cotulla purchases recruitment services from Region 20. These services include participation in the Region 20 job fair, lists of other job fairs CISD may wish to attend, and including Cotulla as a prospective employer in service center recruitment activities. Region 20 also provides a list of prospective candidates to the district, so CISD is not disadvantaged if a representative cannot attend a local Region 20 job fair. Staff does not consistently collect or analyze recruitment data, and could not identify a particular recruitment method that is more successful than others at providing quality candidates interested in the district.

The CISD recruitment process does not take full advantage of the recruitment season. CISD tries to attend one or two fairs a year. Principals are provided with a list of potential fairs they can attend, and the superintendent uses fairs as an opportunity to develop school leadership by taking assistant principals to fairs. A review of district attendance at recruitment fairs from 2008 to 2011 shows district use of this recruitment tool.

Exhibit 4-8 shows CISD Recruitment Fair Attendance from 2008–11.

CISD is not taking full advantage of its job fair recruitment opportunities. Although CISD attended its first job fair earlier in 2010–11, recruitment activities typically do not start early enough to reach potential recruits who are aggressively seeking the best positions or to compete with districts aggressively seeking the best recruits. CISD’s job fair calendars include a column for documenting the number of job seekers that signed up for a particular fair, but that information is not consistently gathered or reviewed. Principals may hold a mini-interview at a job fair, but do not have the authority to make a conditional offer of employment. The district does not follow up with attendees after the fair, unless they are contacted for an interview.

CISD’s primary recruitment tools are the information available to prospective candidates on its website, and a brochure provided to attendees at recruitment fairs. The recruitment brochure consists of the teacher pay scale, the stipend pay scale, recruitment incentives, a benefit summary, a list of central administrators and board members, and a list of community businesses. The information in the brochure is not easily located on the CISD website. For example, the website references salary schedules but the information could not be located. The brochure provides helpful information, but does not highlight the district attributes, or provide information that would answer why a candidate should choose CISD over another, similarly situated district.

**EXHIBIT 4-8
CISD RECRUITMENT FAIR ATTENDANCE
2008–09 TO 2010–11**

YEAR	FAIRS LISTED	FAIRS ATTENDED	STAFF ATTENDING	DATES OF ATTENDANCE
2008–09	19	2	5	2/26/09, 4/3/09
2009–10	19	7	12	3/26/10, 3/31/10, 4/7/10, 4/8/10, 5/8/10, 6/10/10, 6/15/10
2010–11*	5	2**	3	11/11/10

*Calendar for 2010–11 was provided in February 2011 and reflects a partial year of recruitment activity.

**Since the school review team visit, an additional fair has been attended, bringing the total to 2.

SOURCE: CISD Job Fair Calendars 2008–11.

CISD does not regularly assess the components of its compensation package for performance, but it will try different programs to address immediate needs. When CISD recognizes an obstacle in its recruitment efforts it develops a solution. For example, the area housing market has tightened with the recent oil and gas exploration in the area. Area hotels are consistently full, the existing housing market rents by the room, and prices for area housing inventory have increased. To address this problem, the district offered to provide a mobile home to new recruits at pre-boom prices. As another example, the district realized its salaries were not comparable to its competitors. The district increased salaries to be more competitive with the market. There has been no follow up to determine if those or other recruitment programs meet the needs of the candidates CISD wants to attract and retain.

Successful recruitment is a continual process that requires thoughtful planning. The U.S. Office for Personnel Management has identified steps in developing a recruitment strategy. First, recruitment needs must be identified, as well as the competencies that will meet those needs. The organization should identify and design the desired message and image they want to present, and ensure those persons who will be recruiting are aware of those expectations. Finally, relationships should be established with the best sources of applicants and maintain them.

POST-HIRE RETENTION

CISD places new teachers on a three-year probationary contract. The length of the probationary period gives the district time to develop new employees to meet district expectations. If the teacher is not getting results in the

classroom, is not responding to training, or is not exhibiting the enthusiasm or team qualities needed to be successful in Cotulla ISD, the probationary period expires without a recommendation for an additional contract term.

New teachers attend orientation where they receive an overview of district policies, technology and expectations. A new teacher handbook is provided, with monthly calendars and self-assessment tools. New teachers receive a mentor, and are encouraged to contact the mentor with questions or requests for help. Although the district has developed an induction program for new teachers, as seen in **Exhibit 4-9**, a majority of staff surveyed by the review team believe the district is performing average or below in new employee orientation.

Exhibit 4-9 also shows 39.6 percent of responding teachers, 28.6 percent of responding administrators, and 52.7 percent of professional staff believe that the district could do more to help employees prior to making the decision to terminate the contract.

Since 2005–06, CISD has had turnover in numerous teaching positions, all campus leadership positions and many central administration positions. **Exhibit 4-10** shows the number of teachers leaving each year.

Administrative staff explains the high teacher turnover in **Exhibit 4-10** two ways: teachers that were not a good fit for the district and teachers that left after gaining experience they could leverage for positions in larger cities.

Employee turnover can bring new enthusiasm into an organization; elevated turnover can cost an organization in

EXHIBIT 4-9 CISD HUMAN RESOURCES SURVEY RESPONSES FEBRUARY 2011

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
The effectiveness of the district's program to orient new employees.						
Administrators	14.3%	28.6%	14.3%	14.3%	26.6%	0.0%
Teachers	10.4%	31.3%	31.3%	14.6%	8.3%	4.2%
Professional staff	15.8%	36.8%	21.1%	10.5%	10.5%	5.3%
The district's effectiveness in dealing appropriately with employees who perform below the standard of expectation (up to and including termination).						
Administrators	0.0%	28.6%	42.9%	0.0%	28.6%	0.0%
Teachers	20.8%	18.8%	31.3%	8.3%	4.2%	16.7%
Professional staff	21.1%	31.6%	36.8%	0.0%	0.0%	10.5%

NOTE: Percentages may not add to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

**EXHIBIT 4-10
CISD TURNOVER OF TEACHING STAFF
2005–06 TO 2009–10**

YEAR	NUMBER OF TEACHERS	TURNOVER RATE	NUMBER LEAVING*
2005–06	126.5	23.8%	30.1
2006–07	101.1	26.8%	27.0
2007–08	106.8	19.1%	20.3
2008–09	89.0	24.2%	21.5
2009–10	95.7	20.7%	19.8

*Termination data not provided by district. Numbers approximated by turnover percentages.

SOURCE: Texas Education Agency, AEIS, 2009–10.

training and productivity. CISD’s turnover is high, suggesting a recruitment and retention process that does not clearly communicate expectations to recruiters or applicants; does not allow for the timely selection of applicants before the pool of preferred qualifications is exhausted; or, does not address the needs of the candidates it does attract. The continual turnover and reorganization has left the district with gaps in critical services, resulting in undesirable alternatives, such as the use of long-term substitutes in core teaching positions.

Successful retention requires an ongoing commitment from the employer to provide employees with the tools needed for success, and an ongoing commitment from the employee to make best efforts in supporting the mission and strategies of the employer. Both depend on setting expectations, periodic evaluation, open communication, and adjustments to strategies for continual improvement.

CISD should develop a comprehensive recruitment process that incorporates strategies for timely attracting employees with desired characteristics, provides for timely contact and follow up, and includes post-hire programs that develop the desired skills and commitment in recruits. CISD should first identify the characteristics of the preferred candidate, including the desired skills and values expected of successful employees. Once the essential qualifications are identified, district job descriptions should be reviewed to ensure that minimum and preferred requirements are appropriately included.

CISD has invested in technology, and the district should maximize its investment by exploring ways to incorporate technology into the recruitment process. Job descriptions and salary schedules should be posted on the district website, allowing candidates to determine their fit for a particular job.

The district should further evaluate the message and image presented by the website as a potential recruitment tool. CISD should survey newly recruited teachers on whether the site provides the right content for potential applicants in the current market. Marketing materials should be developed in a variety of media. Since students are the ultimate consumer, CISD technology classes could be engaged in developing a video brochure and business classes could help develop a marketing plan. Materials should be reviewed and updated annually to keep the message fresh.

Once the needs and message are established, interview questions should be developed that help predict if a candidate fits the desired qualifications and the questionnaire provided to interviewers. Past job performance can be an indicator of future performance, so questions should ask about past situations where preferred skills or values were used to solve a problem. For example, if the district expects teachers to develop fun and engaging lessons, questions should be designed to elicit that information. A mini-questionnaire with a few critical questions could be used at job fairs as a tool to quickly identify the most likely candidates for follow up. For critical areas such as math or science, the district might consider giving principals authority to arrange a lengthier interview at a job fair and make a conditional offer of employment if defined district criteria are met. If CISD does not want to place authority in a single interviewer, the district could make arrangements for the superintendent to be available for an Internet chat with potential candidates at certain times during the fair.

The job fair calendar should be developed at the beginning of each school year, as many universities hold job fairs in October and November. Principals should be reminded to attend fairs earlier in the year, and attendees should return and report whether or not the fair provided an adequate number of quality applicants. Recruiters should return with a list of potential candidates with contact information. The district should send follow up correspondence to the candidates after the fair, providing them with reasonable expectations for the process. For example, if the district has calendared contract renewal recommendations for January, correspondence to candidates from fall semester job fairs might include information that interviews will begin in January or February, and if selected for interview, the method by which they will be notified.

The district should also develop contacts with university placement offices, targeting those in the geographic area. Current teachers and staff should be asked to contact their

undergraduate or graduate school to establish an alumni connection with the district. A Cotulla connection to a particular school should be noted on the recruitment fair list and the connection considered when arranging the fair schedule.

Recruitment strategies should focus on areas where the district has been less successful. For example, after a job fair the district could ask candidates that do not apply about the district presentation and what could be done to improve the district's message or image. The district has an exit process for terminating employees that combines a resignation form with reasons for leaving. If an employee leaves without completing the form, the district mails one.

CISD should evaluate the information gathered from the exit process so that long term retention is more likely, and for developing recruitment strategies. If limited housing was a factor, the district might pilot a housing allowance during the probationary period. If the position is in a competitive, critical area such as math or science, the district might consider a commuting allowance to attract candidates from other area cities.

Strategies should consider the availability of resources. If the district does not have the resources to train a new employee or cannot compete with the attractions of a larger city, the district should develop strategies that recognize these obstacles. For example, the district could address training and location by targeting experienced teachers with an interest in South Texas. The geographic area is attractive to persons living in cold winter states who enjoy a migration from those areas. Retiring teachers from northern states might be a potential source of candidates. If training is not an issue, and the rural setting is the bigger challenge, the district may ask university placement offices to identify graduating students with a rural background, or attend fairs in areas more likely to draw candidates with experience in rural life. Additionally, the state and federal governments offer student loan forgiveness programs for teachers working in an economically disadvantaged district. Strategies should be evaluated annually to determine their effectiveness and make any needed changes for improvement.

Finally, CISD should review its post-hire induction programs to determine if the district is providing the right mix of support and opportunities to succeed. New employees should be surveyed at new employee orientation on the district's recruitment process, and annually on the district's training, mentoring, and support programs during the

probationary period. Surveys should solicit feedback on how CISD can improve the process.

This recommendation can be implemented with existing resources.

REALIGN HUMAN RESOURCE FUNCTIONS (REC. 30)

CISD's personnel function is not organized to effectively deliver a full range of human resource services. The district is primarily served by the Secretary to the Assistant Superintendent who manages the documentation and procedures for essential personnel actions. Other human resource functions are performed by central administration, placing them in competition with strategic human resource functions and non-personnel related duties for management attention.

PERSONNEL

Exhibit 4-11 lists basic personnel activities performed by school human resource management departments, and compares the district's baseline activities to strategic activities performed by a full service human resources department.

As shown in **Exhibit 4-11**, the district performs basic personnel processes. There is no central management of those processes. Primary responsibility for personnel process oversight rests with the superintendent and Assistant Superintendent. The Assistant Superintendent's Secretary has primary responsibility for the administrative functions that are normally associated with a human resources clerk position.

Decentralization is frequently seen in smaller organizations where there is not enough workload in a category of tasks for specialization. Previously, the district had a management position designated for the oversight of personnel functions. The superintendent dissolved the position with the understanding that the Assistant Superintendent responsible for Curriculum and Instruction, who has personnel experience, would step in if questions or problems arose. The decision to decentralize the human resource function was also based on the addition of technology expected to increase productivity in personnel processes. As part of the decentralization, the superintendent picked up responsibility for oversight of non-electronic tasks, such as the development of personnel forms.

RECRUITMENT AND TRAINING

Many human resource functions are compliance based, and can be performed by a trained and organized individual. The

**EXHIBIT 4-11
STANDARD PERSONNEL ACTIVITIES
2010-11**

TASK	CENTRAL SERVICES	SERVICES PERFORMED/NOT PERFORMED
Recruitment	Posts openings with professional organizations, develops job fair calendar, produces salary schedule, and district directory in hiring brochure.	No turnover analysis; no performance analysis of recruitment efforts; no strategic recruitment planning; no coordination of recruitment schedule; no follow up with applicants; no ongoing development of marketing materials for district; no development of targeted solutions for hard to fill positions. Recruitment content not posted to website.
Hiring process	Manages paperwork; discusses interviewing at leadership meetings; form for recommendation to superintendent and for reference checks available. Sends letters with job offer.	No standard baseline interview questions provided; no scoring rubric provided; lack of assistance in coordinating scheduling.
Management of job applications	Applications are online, and available to principals as needed.	Minimum qualifications are not linked to application process and applications not pre-screened for minimum qualifications.
New hire processing	Collects data necessary to employment such as I9, social security number.	Social security number not verified for payroll purposes.
Benefit Administration	Inputs benefit selections. Develops paperwork/ policies for special benefits such as cell phones and housing.	Procedures for implementation of benefit programs are not developed for all programs.
Employee handbook	Provided.	Not scheduled to coincide with start of school year.
Criminal history check	Performed at time of hire.	Service Performed.
Certification confirmation	Confirm certification upon hire. Periodic checks for expired certification. Reviews certifications for status at contract renewal review.	Service Performed.
Management of job descriptions	A few job descriptions have been adopted and provided to employees.	Job descriptions are only developed when position opens and are not maintained for all positions. Incomplete customization of job description templates, for example, job descriptions do not always match district titles or assigned tasks. No descriptions or expectations for tasks associated with stipend pay.
Market salary surveys	Periodically hires a professional salary survey for all positions. May perform a spot survey if complaints are raised.	Does not perform periodic surveys to maintain competitiveness. Had a formal salary study in 2007 and may have another in three to five years.
Contract preparation	Drafts contracts for employees receiving recommendation for continued employment. Uses standardized forms.	Service Performed.
Hours/Leave administration	Leave is reported and substitutes are located when necessary. Time clock is used to coordinate use of substitutes with employee absences. General policies on use of overtime are documented.	No easily accessible guidelines for policies, including: limits to amount of compensatory time off that can be earned, order in which leave types should be used, or no unpaid "volunteer" time for hourly employees in roles similar to paid position.
Payroll	Paychecks are prepared monthly based on automated time clock and payroll systems.	No documentation of payroll related practices such as: docking stipend pay, taxability of benefit programs such as below market housing, or reimbursement of overpayments caused by district error, or for time clock procedures.
File maintenance	Employee files are created and periodically updated.	No periodic review for retention or description; no process to ensure files removed are returned timely.

EXHIBIT 4-11 (CONTINUED)
STANDARD PERSONNEL ACTIVITIES
2010–11

TASK	CENTRAL SERVICES	SERVICES PERFORMED/NOT PERFORMED
Employee evaluation	Teaching staff evaluated annually.	Non-teaching, auxiliary staff not regularly evaluated. No management of the evaluation process such as ensuring various steps in process are performed promptly.
Training	Technology training provided by district; educator training also provided through videos and attending Region 20 training. Software is provided to maintain proof of certification requirements.	No coordination of scheduling or other processes. No evaluation process for improving schedules or content. No clear guidelines on when training hours are paid or unpaid.

SOURCE: Interviews with CISD staff, February 2011.

district's "human resources clerk" is performing the routine functions well for the workload assigned. The strategic human resource functions require oversight and accountability for proper performance, and they are not occurring under the current configuration. Having assumed more of the operational functions, the superintendent has had less time for strategic functions.

As an example, the board has asked the superintendent to participate in recruitment trips. However, the superintendent has also taken on the responsibility for managing the recruitment schedule. In past years, principals were given a list of job fairs, or the superintendent would call a week or two in advance of a fair with instructions to attend.

In February of the 2010–11 school year, principals had not received information on the fairs they were expected to attend. On occasion, interviews have been scheduled without consideration of the principal's calendar. Principals are given the responsibility for selecting staff, but little assistance in coordinating the details of their schedule with the superintendent's schedule.

Recruitment management from the top of the organization developed as a result of wanting to ensure timely attendance by school leadership, and lack of an administrative alternative. However, instead of a centrally supported, accountable process at the school level, hiring is a process with no clear point of accountability for the workflow, or for the development of successful recruitment strategies.

As another example, principals are tasked with developing school staff training. Districtwide training is developed in the Curriculum and Instruction department. There are no administrative protocols for how training should be developed at either level of management. Participants do not regularly evaluate training developed by central

administration, and the school review team heard a variety of opinions on whether there was too little or too much training. There is no centralized human resources function to develop survey or evaluation tools for either level of training, or to assist departments responsible for developing training in scheduling, agenda development, or other basic services.

It can be appropriate to decentralize personnel functions in different departments. However, decentralization still requires the assignment of responsibility and the tools or authority to perform the function. For example, the secretary/human resource clerk said that despite a robust software program to track training, the district is using manual sign in sheets at training programs. The software program allows prospective participants to sign up for training and also allows the instructor to note if an individual who registered also attended. Requiring attendees and instructors to use this program would reduce administrative workload. The authority to compel staff to use the software for taking training attendance is not clearly assigned.

The training software program also tracks out of district training, but the attendee must update the system with information about the training program attended. Out of district training must also be requested through the district financial system for registration and reimbursement of travel expenses. The financial system and the training system are not linked. The human resources clerk said the workload would be more manageable if staff attending out of district training would promptly enter the information into the tracking system. Reimbursement for expenses could be dependent upon confirmation that the training information had been entered. Without clearly assigned authority to manage this process, no one has developed solutions that reinforce timely reporting of the training.

When evaluating the need for a dedicated position, the cost of assigning clerical tasks to managerial staff should be part of the analysis. The ability of managerial staff to properly oversee one or two functions unrelated to their primary assignment is another consideration. If tasks can be organized such that the appropriate level of staff is performing the appropriate level task with the appropriate training and appropriate authority, decentralizing the function may be more cost effective in an organization with fewer employees. If a decision is made to decentralize functions, policies and procedures for compliance are essential. Managers must be able to review a policy or procedure and know how to proceed without central administrative support.

CISD should reassign administrative personnel tasks from the superintendent to the appropriate level of staff and provide staff with written guidelines for how the process should be administered. If the expectation for job fairs is attendance at two fairs before March, guidelines should require administrative staff to provide the list of available fairs to principals months ahead of time. If the superintendent wants to designate which fairs will be attended, the guidelines should require administrative staff to provide a list of available fairs to the superintendent at the beginning of the school year, so the superintendent can make the designations and return the list to administrative staff for notification and travel arrangements. Administrative staff will prepare information packets, applicant contact forms for follow up, or other necessary items.

Human resource procedures should be provided to school leadership and department heads with a designation of which administrative staff is responsible for administering a particular process. As administration support is reassigned, the superintendent should develop strategic processes and determine if accountability and oversight will remain with the superintendent or be assigned to another position.

To the extent possible, personnel related functions should be consolidated in a single administrative office. Functions such as oversight of the job description and classification process, local area market surveys, recruitment strategy, and benefit administration, such as housing, should be centralized and that supervisor be evaluated on the performance of the assigned activities. Where processes are performed in district departments, such as recruitment activities, the central office should provide adequate administrative support, then hold departments responsible for the process.

This recommendation can be implemented with existing resources.

ACCURATE TIMEKEEPING (REC. 31)

CISD has installed an electronic timekeeping system for employee accountability, but does not have a process for correcting problems encountered in implementation. The district installed the system to provide accountability, security, and reduce payroll-processing time. The system requires numerous corrections each payroll cycle. The edit process is time consuming and offsets the productivity gains of the electronic system.

CISD uses a biometric timekeeping system. Time is reported based on the employee's fingerprint as they check in and out each workday. All employees, including the superintendent, use the system. CISD is staffed with two categories of employee: exempt employees whose time is not required to be maintained under federal law, and non-exempt employees whose time is required to be maintained under federal law. Teachers and administrators are generally considered exempt employees. Prior to installation of the time clock, exempt employees were expected to sign in when arriving and leaving work, but the details were not used to calculate paychecks. Under the informal reporting system, not all exempt employees were consistent about documenting that they had arrived or left for the day. In the event of an emergency, it would not always have been clear what staff was on location.

When a teacher is absent, a substitute must be located to attend the absent teacher's class. Under the prior reporting system, the documentation for teacher absences was not always consistent with the documentation on the hiring of a substitute. There were no efficient ways to audit the payroll associated with substitute teachers. Since the review team visited the district in February 2011, per the Assistant Superintendent, a substitute calling system, AESOP, has been implemented to assist in the day-to-day operations associated with substitute teachers.

The timekeeping system is not as efficient as originally expected. Each payroll period a substantial number of corrections are presented for each school. For example, a review of corrected time clock entries for Newman Middle School in December 2010 and January 2011 revealed a count of 98 requested edits from 44 employees. Edits ranged from employee error, such as forgetting to clock in or out, to equipment failure. Many errors were coding mistakes corrected for substitutes. The other consistent error correction

related to staff attending extracurricular activities and not ending the workday with access to the time clock.

The process for correcting an error is manual. Employees fill out and sign a paper request for correction. A supervisor approves the correction by signing the paper request. The supervisor forwards the hardcopy document to payroll for correction in the system. The time clock system has the capability to capture an electronic signature and create a system audit trail for the edit. Staff has said they retain paper copies of corrections due to a recommendation from their external auditors.

Error corrections for exempt staff generally do not affect pay, as exempt employees are paid for accomplishing the job and not for the actual hours worked. Error corrections for non-exempt staff implicate pay and compliance with the federal Fair Labor Standards Act (FLSA). Due to the importance of accurate time records, it is important to communicate the rules to reduce error. Staff said that written procedures were originally provided in 2004, but are now explained to staff.

Electronic timekeeping has made preparation of payroll more efficient as the information gathered by the time clock links to the district payroll system. While federal law does not require a detail of exempt position hours worked, there are other reasons for keeping accurate information on days worked. If a non-exempt position was inaccurately classified, the district would have accurate records to determine the corrected amount of pay. It also creates a record of accountability, establishing if an employee was performing district business at a particular time.

The district should activate the electronic error correction process in the time clock software, and provide employees with the rules for use, making the process of compliance easier on reporting employees and on administrative staff.

Time clock rules should be made easily accessible, and include instructions on the proper use of codes. For compliance with FLSA, rules that should also be considered include:

- All employees are responsible for accuracy of reporting;
- Non-exempt employees must be paid for actual hours worked;
- Non-exempt employees cannot volunteer to work without pay for jobs similar to the employee's primary function;

- Supervisors cannot knowingly permit unpaid work or uncompensated overtime for non-exempt employees; and
- Non-exempt employees who work unapproved overtime will be compensated but are subject to discipline.

After developing new procedures for reporting and correcting time, the district should activate the electronic edit process in the district software.

This recommendation can be implemented with existing resources.

DISTRICTWIDE EVALUATIONS (REC. 32)

CISD does not apply its evaluation process to all positions throughout the district, resulting in different expectations for staff accountability. The Texas Education Code requires local school boards adopt policies for annual evaluations of teachers. Statutes also regulate evaluation of school counselors and district administrators. Evaluations of support or auxiliary staff are not mandated by statute, although evaluations are a management tool for communicating performance expectations and developing employee progress toward those goals.

The district has a policy for evaluation for all employees. The Employee Handbook states that employee evaluation "is a continuous process that focuses on improvement." Employees are required to participate in an annual evaluation process with their supervisor. In order to comply with policy, the evaluations must be written on approved district forms. The district does not enforce this policy for support or auxiliary employees. In interview, evaluations for support employees were described as a goal rather than a mandate.

There are different ways to communicate performance expectations. Job descriptions are one method. CISD does not have district specific job descriptions, although they have started the process of developing them. Another communication method is an evaluation tool that includes a description of expected performance. CISD has not developed a performance tool for non-educator employees.

Performance evaluations serve many purposes. They provide tools for improvement and document efforts to correct poor performance. Evaluating performance of all employees reinforces the message that performance in all positions supporting the district mission matter. Modeling the behavior expected of employees also communicates

expectations. If an employee is expected to follow district policies, administrators should follow district policies. If a policy is a goal and not a requirement, then it should be drafted with discretionary language such as “a supervisor may evaluate employees annually.”

CISD should implement an evaluation process for non-educator positions that includes a simple, but clear evaluation form, and to ensure compliance, evaluate supervisors on the fair and timely use of the process. The form should reinforce

the values and ethics expected of district employees. CISD should develop a schedule for annual evaluations and provide it to all supervisors. Use of the district evaluation policy should be reinforced by including fair and timely evaluations as a supervisory performance measure.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2011-12	2012-13	2013-14	2014-15	2015-16	5-YEAR (COSTS) SAVINGS	ONE TIME (COSTS) SAVINGS
29. Develop a comprehensive recruitment process that incorporates strategies for timely attracting employees with desired characteristics, provides for timely contact and follow up, and includes post-hire programs that develop the desired skills and commitment in recruits.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
30. Reassign administrative personnel tasks from the superintendent to the appropriate level of staff and provide staff with written guidelines for how the process should be administered.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
31. Activate the electronic error correction process in the time clock software, and provide employees with the rules for use, making the process of compliance easier on reporting employees and on administrative staff.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
32. Implement an evaluation process for non-educator positions that includes a simple, but clear evaluation form, and to ensure compliance, evaluate supervisors on the fair and timely use of the process.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 5

FACILITIES CONSTRUCTION, USE AND MANAGEMENT

COTULLA INDEPENDENT SCHOOL DISTRICT

CHAPTER 5. FACILITIES CONSTRUCTION, USE AND MANAGEMENT

Effective facilities management ensures that a district has facilities that are designed and built in a way that enhances a district's primary educational programs; ensures that facilities comply with state, local and federal regulations; and minimizes the district's utility and maintenance costs. The facilities organization is tasked with developing effective facilities operations and maintenance programs to provide safe, productive, and clean environments where students can learn.

The district has one high school, one middle school, two elementary schools, an early childhood center, administration building, warehouse, the former middle school and various other buildings. **Exhibit 5-1** details the major buildings, square footage, year built or acquired and the most recent renovation.

In May 2007, the community passed a \$15 million bond proposition. The purpose of the proposition was to build a new middle school, a new cafetorium for Encinal Elementary School (EES), a new cafetorium for Ramirez Burks Elementary School (RBES), a new library at the high school,

**EXHIBIT 5-1
CISD BUILDINGS
2010-11**

BUILDING	SQUARE FOOTAGE	YEAR BUILT OR ACQUIRED	MOST RECENT RENOVATION
Cotulla High School	100,089	1978	2000
Newman Middle School	76,000	2010	N/A
Ramirez Burks Elementary School	68,552	1953	2009
Encinal Elementary School	29,052	1982	2008
Early Childhood Center	3,216	Unknown	N/A
Administration Building	6,950	1998	N/A
Warehouse	3,315	1977	N/A
Former Middle School	61,202	1973	1999

SOURCE: CISD, TAPS Property Statement of Value and Construction Documents, February 2011.

a new concession stand and entrance to the football stadium, electrical and safety upgrades to all campuses and other needs with the remainder of the funding. In August 2008, the district sold \$8 million in Qualified Zone Academy Maintenance Tax Notes (QZAMTN) to fund building renovations and equipment.

CISD used a Request for Proposal (RFP) process to solicit bids on the majority of construction projects and used job order costing for the less extensive projects. The district has completed the new middle school, the new cafetorium and music building at EES, the renovations to the cafetorium at RBES, the new high school concession building and several renovation projects. CISD is nearing completion of a transportation and maintenance building. As of October 31, 2010, the district had \$2.6 million of the 2007 bond funds and \$3 million in QZAMTN funds.

In 2009-10, CISD facilities maintenance and operations expenditures were \$1,396,197, accounting for 11 percent of total district expenditures. The Maintenance Department reports to the superintendent and is comprised of a director, four maintenance workers and one grounds worker. The review team noted that the buildings are well maintained given their age.

The Custodial Department also reports to the superintendent and is comprised of a supervisor and 10 custodians. The supervisor cleans the administration building and the areas of the former middle school that are used, in addition to filling in for absent custodians at the schools. The remaining custodians clean an average of 27,691 square feet.

The review team surveyed parents, students, teachers, and staff to obtain input on district operations regarding facilities maintenance and cleanliness. Survey respondents rated the district's operations based on survey statements for all functional areas of the district. **Exhibit 5-2** presents the respondents views of the maintenance and custodial programs. The majority of respondents rated the cleanliness of the schools as average to excellent and the proper and timely maintenance of the campus buildings as average to excellent.

**EXHIBIT 5-2
CISD SCHOOL REVIEW SURVEY RESULTS
FEBRUARY 2011**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
The cleanliness of schools.						
Parent	4.3%	10.9%	43.5%	19.6%	17.4%	4.3%
Administrators	0.0%	0.0%	57.1%	28.6%	14.3%	0.0%
Auxiliary	0.0%	14.3%	28.6%	42.9%	14.3%	0.0%
Professional Support Staff	11.1%	22.2%	27.8%	33.3%	5.6%	0.0%
Student	15.3%	15.9%	35.3%	23.5%	5.3%	4.7%
Teacher	6.0%	16.0%	40.0%	30.0%	8.0%	0.0%
The proper and timely maintenance of campus buildings.						
Parent	2.2%	21.7%	39.1%	21.7%	10.9%	4.3%
Administrators	0.0%	42.9%	28.6%	14.3%	14.3%	0.0%
Auxiliary	14.3%	0.0%	42.9%	28.6%	14.3%	0.0%
Professional Support Staff	5.6%	33.3%	33.3%	27.8%	0.0%	0.0%
Student	11.8%	12.4%	32.9%	27.1%	10.0%	5.9%
Teacher	6.0%	22.0%	44.0%	24.0%	4.0%	0.0%

NOTE: Percentages may not add to 100 percent due to rounding.
SOURCE: Performance Review Team survey results of respondents answering the survey, February 2011.

ACCOMPLISHMENT

- CISD implemented a system that measures and dispenses a preset amount of cleaning chemicals used by the custodians.

FINDINGS

- CISD lacks a process to ensure current material safety data sheets (MSDS) are maintained at all employer locations.
- CISD lacks a preventive maintenance program for its facilities.
- CISD is not in compliance with Chapter 341 of the Health and Safety Code due to the lack of water availability in the Encinal Elementary School and Cotulla High School clinics.

RECOMMENDATIONS

- **Recommendation 33: Develop a process to ensure there are current MSDS for all chemicals and hazardous materials.**
- **Recommendation 34: Establish a preventive maintenance program for the district’s facilities and equipment.**

- **Recommendation 35: Develop plans to ensure that the clinics have a lavatory for hand-washing and that the students cannot access vital systems.**

DETAILED ACCOMPLISHMENT

DISPENSING SYSTEM

CISD implemented a system that measures and dispenses a preset amount of cleaning chemicals used by the custodians. Chemicals are designed to be diluted to specific concentrations to maximize effectiveness of the cleaning solution. When employees dilute the chemicals manually, they may not use the correct proportions and cause waste of the chemicals or an ineffective cleaning solution. Manual mixing of cleaning solutions also increases the risk of spills and splashes that can create hazards for the custodians. This system reduces waste of cleaning chemicals and reduces the hazards of chemical use for the custodians.

DETAILED FINDINGS

HAZARDOUS SUBSTANCES (REC. 33)

CISD lacks a process to ensure current material safety data sheets (MSDS) are maintained at all employer locations.

The Occupational Safety and Health Administration (OSHA) defines an MSDS as “a detailed information bulletin

prepared by the manufacturer or importer of a chemical that describes the physical and chemical properties, physical and health hazards, routes of exposure, precautions for safe handling and use, emergency and first-aid procedures, and control measures.”

The MSDS could not be located at one school during the review team’s visit. The MSDS were found after the review team’s visit, but were determined not to be current.

The Texas Hazard Communication Act (THCA) requires MSDS be available at every location where chemicals or hazardous materials are stored. THCA is codified as Chapter 502 of the Health and Safety Code (HSC). HSC section 502.006(b) and (c) states that an employer “shall maintain ... a current MSDS for each hazardous chemical purchased” and that those MSDS “shall be readily available, on request, for review ... at each workplace.”

The Department of State Health Services (DSHS) is responsible for monitoring compliance with THCA and conducts random inspections of governmental entities to determine compliance. The failure to have the MSDS readily available can be considered a minor to critical violation depending on the number of missing MSDS. The fine for the first occurrence, depending on the severity of the violation, is between \$50 and \$300.

CISD should develop a process to ensure that MSDS are available for all chemicals and hazardous materials at each employer location. An inventory of all chemicals and hazardous materials at each employer location should be taken and compared to the MSDS at that location. Missing MSDS should be requested from the supplier of the chemical or hazardous material.

Since onsite work MSDS have been made available at all employer locations.

This recommendation can be implemented with existing resources.

PREVENTIVE MAINTENANCE (REC. 34)

CISD lacks a preventive maintenance program for its facilities. The maintenance staff reacts to equipment failure, work orders for repairs, setups at buildings, and staff requests and complaints. Other than the replacement of air filters on a monthly basis, cleaning the coils on the air conditioning units at least annually, and doing some building inspections during student holidays, a preventive maintenance program does not exist.

Preventive maintenance is planned maintenance efforts that are scheduled to prevent equipment breakdowns and failures. The objective of preventive maintenance is to preserve and enhance equipment reliability by replacing worn components before they actually fail. Preventive maintenance activities include inspections, equipment checks and partial or complete overhauls at specified periods.

The benefits of preventive maintenance include improved system reliability, decreased cost of replacement, and decreased system downtime. To develop a preventive maintenance schedule, maintenance needs a complete inventory of all equipment and building systems, a three year history of failures, and the cost of the repairs for the equipment and building systems. When ranked in descending order by cost, the failures will be from the highest priority to the lowest priority. The failures must be evaluated to determine what procedures could have been taken to prevent the breakdown. Preventive maintenance activities are scheduled at specific intervals and include both maintenance and inspections.

CISD should develop and implement a preventive maintenance program for the district’s facilities and equipment. The Director of Maintenance should develop the preventive maintenance program and specific schedule of activities, including the costs of the activities. This plan should guide the maintenance budget for future years.

Exhibit 5-3 displays a sample Preventive Management program that shows the frequency that certain facilities components should be inspected and repaired or replaced.

This recommendation can be implemented with existing resources.

SCHOOL CLINICS (REC. 35)

CISD is not in compliance with Chapter 341 of the Health and Safety Code due to the lack of water availability in the Encinal Elementary School and Cotulla High School clinics.

The clinic at Encinal Elementary School was moved from its previous location to a small room adjacent to the restrooms and contains a wall mounted mechanical panel. The room it was moved from has a sink and toilet. The clinic was moved to facilitate the relocation of the school principal and secretary to more accessible locations for students, parents, and staff. The Department of State Health Services made a routine inspection of Encinal Elementary School in November 2010 and recommended installing a sink with hot

**EXHIBIT 5-3
A SAMPLE PREVENTIVE MAINTENANCE PROGRAM FOR FACILITIES**

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

SOURCE: Manor ISD School Review, 2009.

and cold water, providing a locking medicine cabinet, and providing a refrigerator for the clinic.

The clinic at Cotulla High School was moved from its previous location to a workroom area in another building to facilitate parents picking up students and as part of the planned school renovations that included a completely outfitted clinic. The room is located next to the restrooms, but does not have water. The room also contains a technology server rack that provides network services to the building.

Chapter 341 of the Health and Safety Code addresses minimum standards of sanitation and health protection measures. Section 341.065(b) states, “A school building must be properly ventilated and provided with an adequate supply of drinking water, an approved sewage disposal system, hand-washing facilities, a heating system, and lighting facilities that conform to established standards of good public health engineering practices.” The Public School Inspection checklist used by DSHS to review compliance with the Health and Safety Code includes a section on the

nurse station that delineates seven areas for inspection. One area is the existence of a lavatory with hot and cold water.

By not having a lavatory for hand-washing in the school clinics, CISD does not comply with the Health and Safety Code and puts employees and students at risk of contracting and spreading communicable diseases. By having the clinics in areas where mechanical panels and server racks are located, CISD puts students and vital systems at risk due to the propensity of students to tamper with anything within their reach when unattended.

CISD should develop plans to ensure that the clinics have a lavatory for hand-washing and that the students cannot access vital systems. This should include, at a minimum, moving the technology server rack currently located in the high school clinic to a more suitable location.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2011-12	2012-13	2013-14	2014-15	2015-16	5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
33. Develop a process to ensure there are current MSDS for all chemicals and hazardous materials.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
34. Establish a preventive maintenance program for the district's facilities and equipment.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
35. Develop plans to ensure that the clinics have a lavatory for hand-washing and that the students cannot access vital systems.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 6

COMPUTERS AND TECHNOLOGY

COTULLA INDEPENDENT SCHOOL DISTRICT

CHAPTER 6. COMPUTERS AND TECHNOLOGY

Technology has become an essential part of everyday life, and as a result, is an essential component of education. Since jobs from car repair to space missions rely on computers, the state of Texas prepared a long-range plan for educational technology. The State Board for Educator Certification (SBE) has adopted supporting technology standards for teachers, and the Texas Legislature has provided funding for technology in the classroom. Cotulla Independent School District (CISD) has taken many steps to meet state goals, and has used state funding to maximize its technology dollars.

CISD connects all areas of its operations through a single domain and a network of 52 servers to support computers, telephones, and security. This configuration serves a diverse set of operations from classrooms to cafeterias to central administration, and connects the district to the Internet using three T1 lines. A T1 line is an industry term for Trunk Line One—a digital transmission line which can carry voice, audio and other data traffic at high speeds.

All CISD classrooms are connected to the Internet. To protect students from harmful materials, the district has an “acceptable use” policy that defines how students and staff can use district computers and the Internet. The district also has a software filtering application that restricts access to sites that may contain inappropriate or harmful materials, and limits the type of websites that can be accessed by students or teachers.

The school review included a survey on computers and information technology. **Exhibit 6-1** shows the perception of CISD administrators, teachers, parents, and students on the district’s ability to provide technology to the classroom.

In a survey completed by district students, 36.2 percent believe the district does an average job of keeping computers up to date and useful for applying new technology and 29.5 percent believe the job is good or excellent. At 48.0 percent, almost half of responding teachers believe student access to computers for learning is good or excellent. A majority of teachers and administrators believe access to the Internet is good or excellent, although several respondents commented

**EXHIBIT 6-1
CISD COMPUTERS AND INFORMATION TECHNOLOGY SURVEY RESPONSES
FEBRUARY 2011**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
Easy student access to the Internet.						
Administrators	0.0%	0.0%	28.6%	42.9%	28.6%	0.0%
Teachers	4.2%	16.7%	25.0%	33.3%	20.8%	0.0%
Parents	2.2%	13.3%	40.0%	22.2%	20.0%	2.2%
Students	25.0%	12.8%	34.8%	14.6%	6.7%	6.1%
Student access to sufficient computers for students to learn and apply technology.						
Administrators	0.0%	14.3%	28.6%	28.6%	28.6%	0.0%
Teachers	6.3%	22.9%	22.9%	31.3%	16.7%	0.0%
Parents	2.2%	17.8%	37.8%	22.2%	20.0%	0.0%
Students	17.8%	14.1%	37.4%	17.8%	5.5%	7.4%
The age and condition of computers and their usefulness in applying new technology.						
Administrators	0.0%	0.0%	28.6%	28.6%	28.6%	14.3%
Teachers	4.2%	14.6%	29.2%	31.3%	20.8%	0.0%
Parents	4.4%	4.4%	46.7%	24.4%	20.0%	0.0%
Students	10.4%	17.2%	36.2%	21.5%	8.0%	6.7%

NOTE: Percentages may not add to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

negatively on the blocking program which limits access to questionable websites.

The amount of technology varies from school to school. Elementary schools have computers assigned to each class, plus mobile computer carts, and a bank of computers in the library. Middle school students have ready access with individually assigned laptops, computer labs, mobile computer carts and a bank of computers in the library. High school students have a computer lab, mobile computer carts, and a computer cart assigned to the library.

CISD has two primary applications that serve central data management. The district maintains student information required to be reported to the state, and has a financial system that meets state accounting and reporting requirements. CISD purchases its student and financial management software from the Regional Education Service Center XX (Region 20). AT&T provides the district's Internet connection.

TECHNOLOGY ORGANIZATION AND BUDGETS

The CISD Technology Department has four staff: a Technology Director, a Webmaster/Training Coordinator, a Network Administrator, and a Network Technician. The director is responsible for technology planning, hardware and software acquisition, and applying for special technology funding. The staff implements and utilizes technology to reach CISD's educational goals.

The State of Texas provides a technology allotment to school districts based on the average daily attendance of students. The E-Rate program provides federal funding for technology infrastructure and Internet access. CISD meets program requirements and receives E-Rate discounts.

The State of Texas has established educational technology targets for school districts in its Long-Range Plan for Technology, 2006–2020 (LRPT), and provides a self-evaluation tool to help districts track their progress toward meeting state technology expectations. The evaluation tool is called the Texas School Technology and Readiness (STaR) chart. Districts can use the results of the self-assessment in technology planning, budgeting, and monitoring progress toward meeting expectations.

The LRPT has four developmental goals: Early Technology, Developing Technology, Advanced Technology, and Target Technology. Each goal is identified on the STaR chart, and staff answers result in a numerical ranking assigned to the goals. Districts rank themselves in four areas: Teaching and

Learning, Educator Preparation, Administration and Support, and Infrastructure. If a district ranks itself as a one, it has identified itself as being in the Early Technology development phase. Developing Technology, Advanced Technology, and Target Technology are two, three, and four respectively.

Exhibit 6-2 summarizes CISD's STaR results for 2009–10. The district staff ranks CISD in the Developing Technology Stage of readiness for the two educator specific areas: Teaching and Learning and Educator Preparation. Staff ranks CISD in the Advanced Technology stage for Administration and Support and Infrastructure areas.

The ranking as Developing Technology in Teaching and Learning means teachers direct technology instruction. Students regularly and individually use technology to research and prepare projects, and at least two technology classes are offered at the high school level. In 2009–10, 59.3 percent of Texas school districts ranked themselves as Developing Technology in this category.

The ranking as Developing Technology in Educator Preparation means technology is used primarily for administration and management tasks. Online resources are used in the classroom, and 40 percent of educators meet SBEC technology standards. Administrators expect teachers to use technology and six to 24 percent of the technology budget is for professional development. In 2009–10, 68.7 percent of state school districts ranked themselves as Developing Technology in this category.

The ranking as Advanced Technology in the area of Administration and Support means the district has a campus plan supported by the board and administration. The district would have one technical support position for every 500 computers, and a full time director of technology position. Various funding sources would be used to reach this goal. In 2009–10, 55 percent of Texas school districts ranked themselves as Advanced Technology in this category.

The ranking as Advanced Technology in the key area of Infrastructure means the district provides a ratio of one computer for four or fewer students; there is direct Internet connectivity in 75 percent of all classrooms and web-based learning is available. All classrooms are networked, and each educator has a computer. In 2009–10, 61 percent of state school districts ranked themselves as Developing Technology in this category.

EXHIBIT 6-2
CISD TEXAS STaR CHART RESULTS
2009–10

KEY AREA I: TEACHING AND LEARNING						
RATING: DEVELOPING TECHNOLOGY (TOTAL SCORE OF 9-14)						
TEACHER ROLE AND COLLABORATIVE LEARNING	PATTERNS OF TEACHER USE	FREQUENCY/DESIGN OF INSTRUCTION	CURRICULUM AREAS	TECHNOLOGY APPLICATION TEKS ASSESSMENT	PATTERNS OF STUDENT USE	SCORE
2	2	3	2	2	2	14
KEY AREA II: EDUCATOR PREPARATION AND DEVELOPMENT						
RATING: DEVELOPING TECHNOLOGY (TOTAL SCORE OF 9-14)						
CONTENT OF TRAINING	CAPABILITIES OF EDUCATORS	LEADERSHIP CAPABILITIES OF ADMINISTRATORS	MODELS OF PROFESSIONAL DEVELOPMENT	UNDERSTANDING AND PATTERNS OF USE	TECHNOLOGY BUDGET	SCORE
2	3	2	2	3	2	13
KEY AREA III: ADMINISTRATION AND SUPPORT						
RATING: ADVANCED TECHNOLOGY (TOTAL SCORE OF 15-20)						
VISION AND PLANNING	TECHNICAL SUPPORT	INSTRUCTION AND ADMINISTRATIVE STAFFING	BUDGET	FUNDING	LEADERSHIP AND SUPPORT FOR ONLINE LEARNING	SCORE
3	2	2	3	2	3	16
KEY AREA IV: INFRASTRUCTURE FOR TECHNOLOGY						
RATING: ADVANCED TECHNOLOGY (TOTAL SCORE OF 15-20)						
STUDENTS PER COMPUTER	INTERNET ACCESS CONNECTIVITY/SPEED	DISTANCE LEARNING	LAN/WAN	OTHER TECHNOLOGIES	DISTANCE LEARNING CAPACITY	SCORE
3	4	2	2	3	3	17

SOURCE: Texas STaR Chart 2009–10.

CISD ranked itself as Developing Technology in all categories in 2005. In 2007–08, CISD's ranking moved to Advanced Technology in Infrastructure. Administration and Support reached Advanced Technology status in 2008–09. This was due in part to increases in rank for technology at the new middle school.

Three school districts were selected as CISD peers for this review: Freer, Jim Hogg, and Quanah Independent School Districts (ISDs). **Exhibit 6-3** compares CISD's self-evaluation of its technology readiness with its peer's own self-evaluations.

As shown, in Key Areas I and II CISD is slightly ahead of Freer ISD, but is slightly behind Quanah ISD. The percentage of state districts reaching target status in Key Areas I and II shows it is taking longer for Texas districts to reach the target in the areas directly associated with educational integration.

HARDWARE AND SOFTWARE

CISD provides every teacher with a laptop computer and each classroom has a ceiling mounted projector for integration of technology presentations into daily lessons. The district provides a mix of fixed labs, mobile carts, and classroom computers to achieve a 2:1 student to computer ratio. **Exhibit 6-4** shows the distribution among schools.

The high school has a spread of buildings and maintains a single computer lab with a computer cart assigned to each building. The middle school has a single fixed lab and two carts, but also assigns computers individually. In addition to the computers in **Exhibit 6-4**, a review of inventory spreadsheets showed the high school has five interactive whiteboards and three document cameras. The middle school has seven interactive whiteboards and 10 document cameras.

CISD has focused its technology on its elementary programs, assigning technology to immerse younger students in preparation for a changing technology landscape. In its elementary schools, Encinal Elementary has 12 document

EXHIBIT 6-3
CISD TEXAS STaR CHART RESULT COMPARISONS WITH PEER DISTRICTS
2009–10

KEY AREA I: TEACHING AND LEARNING*				
FREER ISD	JIM HOGG ISD	COTULLA ISD	QUANAH ISD	PERCENT OF STATE REACHING TARGET STATUS
12	14	14	15	0.9
KEY AREA II: EDUCATOR PREPARATION AND DEVELOPMENT*				
FREER ISD	JIM HOGG ISD	COTULLA ISD	QUANAH ISD	PERCENT OF STATE REACHING TARGET STATUS
11	11	13	15	0.7
KEY AREA III: ADMINISTRATION AND SUPPORT*				
FREER ISD	JIM HOGG ISD	COTULLA ISD	QUANAH ISD	PERCENT OF STATE REACHING TARGET STATUS
15	17	16	15	4.9
KEY AREA IV: INFRASTRUCTURE FOR TECHNOLOGY*				
FREER ISD	JIM HOGG ISD	COTULLA ISD	QUANAH ISD	PERCENT OF STATE REACHING TARGET STATUS
14	15	17	15	7.6

*Rating Key: Early Technology (total score of 6–8); Developing Technology (total score of 9–14); Advanced technology (total score of 15–20); Target technology (total score of 21–24).

SOURCE: Texas STaR Chart 2009–10.

EXHIBIT 6-4
CISD TECHNOLOGY DISTRIBUTION
2010–11

SCHOOL	NUMBER OF STUDENTS	FIXED LAB COMPUTERS	MOBILE COMPUTER CARTS	LIBRARY (FIXED/ CART)	STUDENT/ROOM ASSIGNED	STUDENTS PER COMPUTER
Cotulla High School	308	16	131	10	9	1.86
Newman Middle School	244	23	16	13	20	3.39
Ramirez- Burks Elementary	517	42	0	21	199	1.97
Encinal Elementary	109	20	77	5	0	1.07

SOURCE: Texas Education Agency, AEIS, 2009–10; CISD technology inventory, 2011.

cameras while Ramirez Burks Elementary has none assigned. Encinal Elementary has seven interactive whiteboards, and Ramirez Burks Elementary has four. Both elementary schools have 12 classroom printers.

The district has also extended technology to parents. Through the Internet, parents can log in and view student grades, assignments, and attendance records. Parents are also alerted to early release, emergency school closings, and other events through an automated notification system.

In addition to computers for student and staff, CISD uses technology to protect people and property. The district has an extensive camera system located at the schools and on a bus that serves Encinal students. The system captures digital images to a district server which can later be reviewed if needed. The security system has over 90 cameras, which are the responsibility of the Technology Department.

ACCOMPLISHMENT

- CISD has invested in a wide range of technology to reach educational goals, providing students access to a technology rich environment.

FINDINGS

- CISD lacks a robust technology planning process that ensures technology programs are instructionally supported and sustainable.
- CISD lacks a process for teachers or other end users of district technology to provide feedback in the implementation of equipment, applications, or policies they put into service.

- CISD's website lacks current information needed for effective communication and compliance with state statutory requirements.
- CISD's technology procurement process is not well defined, and does not provide sufficient communication or controls to ensure timely provision of needed technology.
- CISD does not have documented processes and procedures necessary for effective administration of an IT department.
- CISD has not clearly defined departmental plans for obtaining training for technology staff or providing technology training to school and administrative staff.
- CISD does not fully protect its servers, switches, and other hardware, placing it at risk for damage.

RECOMMENDATIONS

- **Recommendation 36: Develop a detailed work plan that supports the more general activities in the district technology plan.**
- **Recommendation 37: Develop an implementation process for technology projects that includes effective communication and end-user feedback components, and provide training to staff on the processes.**
- **Recommendation 38: Identify a single point for accountability for the website, task that position with ensuring minimum legal requirements are met, and develop tools for campuses and departments to ensure timely update of information.**
- **Recommendation 39: Develop and document a procurement process that outlines the steps and considerations necessary for timely delivery of technology purchases, and publish the information on its website.**
- **Recommendation 40: Reduce errors and assure continuity of service by drafting policies and essential procedures for ease of use by staff and end-users.**
- **Recommendation 41: Implement a multi-tiered technology training program that includes curriculum application support.**

- **Recommendation 42: Develop standards for security and accessibility of technology even when temporary moves and assignments occur.**

DETAILED ACCOMPLISHMENT

CLASSROOM AND STUDENT TECHNOLOGY

CISD has invested in a wide range of technology to reach educational goals, providing students access to a technology rich environment. Each classroom has a ceiling mounted projector with speakers, each teacher has a laptop computer, and all students have access to computers through a configuration of computer labs, mobile computer carts, and individual computer assignments. In addition, in 2009–10 the district established SmartLabs™ with specialized software to engage students in the areas of broadcasting, engineering, business, mechanics, and other potential career interests.

The SmartLabs™ are located at both the high school and middle school campuses, and include specialized hardware and software for laser design, robotics, piloting aircraft, and running a business such as management of musical acts. Broadcasting equipment is set up studio style, to allow students to gain experience similar to industry careers. Instead of announcements over the public address system, students can video broadcast morning or weekly announcements.

Labs are designed to encourage collaboration by teaming two students to a work area. Students must maintain a log of his or her activities, and develop a presentation at the end of the project. Collaboration and presentation skills are necessary for success in today's workforce, so students learn both technical and practical lessons in the lab.

CISD also uses specialized Internet video software, which allows video streaming of school events over the district intranet for students and teachers to watch. This technology also allows live participation from diverse locations, encouraging parent participation in off-campus meetings by streaming the meeting to their neighborhood school. Technology Department staff posts photographs from school or classroom events to the intranet through this software, allowing students and staff to share educational successes and celebrations.

The district's commitment to technology is an investment for its students, providing an educational environment necessary for future personal success.

DETAILED FINDINGS

PLANNING FOR EFFECTIVE AND SUPPORTABLE TECHNOLOGY (REC. 36)

CISD lacks a robust technology planning process that ensures technology programs are instructionally supported and sustainable. The district has a technology plan adopted by the board, but does not have a department level work plan that identifies the steps and resources necessary to carry out the district plan. Without a work plan, resources may not be efficiently applied or projects appropriately prioritized.

Texas school districts are required to have a technology plan that ties to state and national standards. The plan must be approved by the Texas Education Agency (TEA) and is a prerequisite for state and federal funding programs. The TEA has approved CISD's districtwide plan. Since the school review team visit, CISD has submitted and received TEA approval for their 2011–2012 technology plan.

The district has a technology planning committee consisting of the Technology Director, the education technologist, the school technology coordinators, a parent representative, and a community representative. The technology plan in place when the school review team visited in February 2011 was developed by CISD and covered years 2008 through 2011. It sets educational goals and identifies technology related activities and strategies to reach those goals. The plan was developed under the guidance of a previous Technology Director. The vision and goals of the technology plan include:

- Increase local knowledge about the availability and use of technology and telecommunications infrastructure;
- Involve all stakeholders in a systemic two-way communication, which facilitates technology planning, implementation and continuation/expansion;
- Have networked computers in every classroom for a 2:1 student to workstation ratio and integrate technology across the curriculum in such a way that the boundaries of the learning environment will be extended;
- Develop core competencies aligned with Texas Essential Knowledge and Skills (TEKS), which include email, electronic grade book, distance learning, presentation skills, software installation and use, Internet downloads, and use of online resources;

- Actively promote collaboration among entities using telecommunication technologies;
- Judicious utilization of local budget by securing additional funding in support of Technology Plan goals; and
- Improve student performance on Texas Assessment of Knowledge and Skills (TAKS) and TEKS by enabling equitable access and effective use of technology as a teaching/learning tool.

OBJECTIVES

The Technology Department does not have a network design document that identifies the configuration needed to support the goals in the technology plan, or the resources required to support the optimum configuration.

A network design is like the floor plan to a home. The network needs to accommodate a certain number of users, support certain types of use, withstand certain unforeseen events, and at an acceptable cost for both its build and its maintenance. A network design lays out how those needs will be met. Network designs should anticipate user growth while retaining flexibility for changes in available resources or user needs.

CISD developed its technology plan to support its District Improvement Plan (DIP). The DIP is a state required long-range plan for school districts. CISD's technology plan recognizes that to integrate technology into the curriculum, network infrastructure is essential. The most recent network design document was prepared in 2006, prior to the development of the most recent district technology plan.

The district currently has 45 servers dedicated to education, located in five buildings serviced primarily by two positions, the network administrator and the network technologist. The Technology Director and the Webmaster/Training Coordinator support the network staff when needed, although the Webmaster is moved to various tasks throughout the district and may not be routinely available as back-up.

School staff praised the technology staff, but acknowledged that there are server problems that are not resolved. A work order analysis showed the average time, to resolution of a problem by the two network positions is 10 days, nine hours and seven minutes. At any given time the average number of open calls for service is 86. In an interview, the Network Administrator said it would help if he had an application that would allow him to monitor the servers in real time. The

Webmaster/Training Coordinator said that once the district goal of a one-to-one student computer ratio initiative is fully implemented there will be little time for other duties. CISD has adopted a strategy of extending its network to the homes of students, but has not identified the long-term resources to support the strategy.

For example, current technology allows the creation of a virtual environment to pool processing power. Instead of a dispersed configuration of servers hosting singular functions, sometimes referred to as server sprawl; pooled processing allows the servers to determine the areas of highest need and distribute the power to meet the demands in real time, reducing outages. One or two persons can more easily manage some network configurations such as pooled processing as it centralizes administrative tasks, and properly designed, virtualization can also reduce technology costs.

An identified network objective and a design that accomplishes the identified objective allows an organization to determine if current staff is sufficient to implement and maintain the objective, and adjust design or staffing for optimal performance. The district has not developed a design that identifies or balances the resources necessary for effective implementation of DIP strategies.

REVIEW AND UPDATE

Although the technology plan calls for periodic reports and updates to the plan, the technology department does not have a structure to assess progress across all projects and activities.

For example, Infrastructure and Network objectives in the plan reference a timeline for installing a Local Area Network (LAN) at each school, and a Wide Area Network (WAN) for the district, and a remote server capable of allowing student and parent access to the district server from home. Progress on this objective is to be reported quarterly to the board, and an annual survey is expected. The Technology Director makes regular reports to the board, but the district has not surveyed its parents or staff.

When the review team was in the district in February 2011, the Technology Director said the 2008–11 technology plan has been completed, but the student and parent access had not been fully implemented. Parents, teachers, or others interested in a project's progress do not have an easy method of checking its status.

CISD should develop a detailed work plan that supports and implements the more general activities in the district

technology plan. The plan should include a network design for delivering technology capability, estimated project costs, deadlines for technology plan strategies, and a review and update process for both technology and instructional staff.

The current director was hired in the second year of the three-year plan. The current plan ends in June of 2011, and another long-range plan will need to be developed. This is an excellent opportunity for the director to develop a process for project planning that supports the district's goals and strategies. As CISD develops its next long-range technology plan, the Technology Director and the Technology Committee should recommend project priorities in concert with board goal setting and budget processes. The director should develop project implementation steps and timelines for the activities in the technology plan, as well as the resources needed to implement and maintain them.

The district should contract with a network design consultant to review the current network configuration. District plans and staffing resources should be assessed and recommendations made on a cost efficient, sustainable configuration. A life cycle replacement plan should be developed in concert with the network design.

Technology plans, whether at the district or department level, should be adaptable to changes in technology, legislative requirements, and district goals. The life-cycle replacement plan and work plans should align with the network design. An annual review and update of the work plan should ensure the priorities and projected costs stay current.

The cost to implement this recommendation is \$4,000 for the network design consultant. The cost was determined by assuming 20 hours for the project at an hourly rate of \$200 (20 x \$200 = \$4,000). After successful implementation of a network design plan, it may be assumed a cost savings will occur; however, the amount of the savings, if any, cannot be determined.

SUCCESSFUL IMPLEMENTATION OF TECHNOLOGY PROGRAMS (REC. 37)

CISD lacks a process for teachers or other end users of district technology to provide feedback in the implementation of equipment, applications, or policies they put into service. CISD evaluates teachers on how they implement technology in the classroom, but teachers are not able to provide input in the technology process. Without clear and open lines of communication, strategies and improvements may not be successfully implemented. The CISD Technology Committee

engages in district level planning, but does not participate as a committee in project implementation. The committee did not meet in 2009–10, but has met once in 2010–11.

CISD has invested heavily in classroom technology with the expectation that teachers will use equipment and software to build engaging and successful lessons. The district uses C-SCOPE as a curriculum builder, and Working on the Work™ (WOW) for engaging lessons, Fast Forward™ as a student focus builder, and SmartLabs™ for Career and Technical Education. The district has txGradebook™ for student grading, Eduphoria™ for data disaggregation, lesson plans, personal graduation plans, PDA's, surveys, technology and maintenance work orders and other administrative tasks, and PD360™ for on demand training. The district connects every classroom to the Internet, but also has security software to filter content and limit access to Internet sites deemed inappropriate by the software. District staff uses technology in almost every aspect of their work.

Principals are expected to submit bandwidth, connectivity, and hardware problems identified by campus staff in order to get school needs identified and met, but once submitted, the Technology Department does not have an effective process to address these issues. For example, the high school has a cart with 20 plus laptops, but only five can be active at a given time due to bandwidth issues. The district is applying for special funding to increase bandwidth districtwide. The principal identified an interim solution that would cost \$4,000 and make the Internet accessible to the entire class during lessons. The request for special bandwidth funding was initially rejected, the Technology Director did not approve the interim solution, and no alternative solution has been developed to address current student needs.

On occasion, a principal may survey staff on technology issues, but the district does not have a standard process to receive feedback from the staff implementing the technology. In interviews, staff provided comments on the positives and negatives of various software or hardware configurations. This results in missed opportunities for successful transformation when changes to technology policies or programs occur.

As an example, teachers interviewed found the curriculum system helpful when creating a curriculum from scratch, and helpful as a foundation for lesson development; however, the instructions for implementation did not allow for any deviation. Teachers identified areas where the program had

not been updated to align with state standards; but, they did not have a process for making corrective adjustments.

As another example, high school teachers have been asked to implement the student focus building system. The program runs on a dedicated server, but according to school staff, the program freezes several times during the week making consistent use difficult in a tightly scheduled school day. There is no process for evaluating the software and supporting hardware, developing a solution for correction, or formally communicating corrective efforts with the end-users to reduce frustration.

As a third example, the district has software that filters inappropriate content from media and Internet sources. The application can be set to lock out certain sites. In October 2010, changes were made to the content security software. Teachers were previously able to access news outlets such as CNN for integrating current events into lessons. After the change, even education specific sites such as Teacher Tube, were unavailable. Teachers did not receive adequate notice of the access change, and despite complaints, the Technology Department has not provided workable solutions to accessing educational Internet content in time for lesson use.

In interviews, students mentioned teacher unhappiness with named software programs and the lack of flexibility they have in lesson planning. Only teaching staff could have communicated this information to its students. While teachers should be champions of the education they are providing to their students, without an appropriate administrative process that includes end-user review, staff concerns may be communicated through less appropriate outlets.

Communication between the Technology Department and the end-user is essential to successful implementation of a new technology or a new policy. The district provided change management training to its teachers, who use the training to develop curriculum. The process has not fully extended to the Technology Department. The development of user groups, super user mentors, technology champions, and other knowledge sharing associations are common in the technology industry. Implementation of new technology or policy requires operational considerations as well as emotional considerations for staff change. Staff must be encouraged to accept the change and understand how the change will benefit them in their job. Effective organizations identify which staff are looked to for guidance by coworkers and which staff want to be the “go-to” persons when co-workers

need help, and enlist them in understanding and supporting the change.

Cushing ISD allows teachers that champion a new technology to be early implementers. Early implementers may get newer, faster hardware to try out new software. These teachers become the resource for others as piloted technology is implemented districtwide. Quanah ISD has a variety of communication tools such as podcasting and online newsletters to introduce new technology and create interest in its implementation.

CISD should develop an implementation process for technology projects that include effective communication and end-user feedback components, and training to staff on the processes. Implementation should begin with a communication component that identifies how information about the change needs to be shared with staff. The message should not only be about the value to the district, and to the student, but also, how the change will be of value to the end-user. This should include how and when the messages will be presented, and anticipate the types of questions from those affected by the change. The Technology Committee can assist in developing messages and materials for internal and external communication for larger projects. The process should also identify those administrators, managers, or staff that will be responsible implementing the change in their area, and the steps they will need to take to gain support among staff.

The implementation process should identify the knowledge needed before and during the transition, as well as after full implementation. The plan should determine the best method for disseminating the knowledge. In larger projects it may be formal training sessions, for smaller changes it may be a how-to guide or video available on the district intranet. Finally, there should be a process for capturing and considering end-user feedback, which the district can then use to improve the process, policy, or product.

A fiscal impact is not assumed in this recommendation. Once the district determines which actions to pursue, the costs or savings should be considered in the implementation.

MAINTAINING A POSITIVE INTERNET PRESENCE (REC. 38)

CISD's website lacks current information needed for effective communication and compliance with state statutory requirements. For many, the Internet is a primary source for research and information. It is also a communication link between an organization and the people using its goods or

services. Out of date, incomplete, or inconsistent information can create an unintended impression for visitors to the site.

CISD employs a Webmaster to oversee the district website for accuracy and current content. The position also assists district personnel in updating, enhancing, or modifying campus Internet or intranet content. The web duties are not full time, as the position also serves as the Technology Training Coordinator, and is also responsible for troubleshooting hardware and software problems reported by staff.

The district "home page," or primary page that opens at the district's web address is arranged to provide quick access to district events, photographs, and links to five popular search areas: district, parents, students, campuses, and employment. The home page also has a direct link to CISD's accreditation status, and a search bar which returns links to related information. The home page is not cluttered and presents a Texas theme consistent with the district mascot—the Cotulla Cowboys and Cowgirls.

The district website also provides parents access to student homework, grades, discipline and attendance through a password-protected portal. Students can connect to educational resources such as online testing and class assignments. Staff can access a number of resources, including: email, work order applications, the electronic grade book, online training, and curriculum development software.

Other information pages are inconsistently maintained. For example, district staff directories do not provide the same information for all staff. The Assistant Superintendent provides his title, telephone number and extension, fax number, and address. The central directory shows the high school principal's name and title on one page, but name, title, and phone number on another directory page. Not all staff provided contact information through this directory. CISD does provide email links to district staff on another part of the site.

Pages for staff and special interest groups are inconsistently used. The high school counselor has one of the more robust pages with many links to college related sites and events. The page set aside for high school seniors has a single graphic for the "class of 2008." The superintendent's blog page is an empty template with no blog entries, but has not been deleted, although the superintendent has a different web page for news and other communication.

The artistic design of the site is also inconsistent. Pages where tax information is located are not in the same rustic style as the main area of the district site. In an interview, technology staff said the Tax Office used to connect electronically through the LaSalle County Appraisal District. Recently, they have become part of CISD's network. There is no differentiation between the two entities when navigating between the two, and the differences in design create confusion when moving about the CISD site.

The district provides several levels of responsibility for web content. In addition to the Webmaster position, each school has a technology coordinator to assist with content updates. Each staff member with his or her own page is responsible for upkeep of that page. Each department is responsible for keeping the department web page current. The Technology Director stated that campus techs are currently assigned as the first point of contact to ensure information is updated in a timely manner. While many are tasked with keeping the district website current, no one is ultimately accountable for its presentation or accuracy.

School districts with a website are required to post certain information. **Exhibit 6-5** provides a sampling of those requirements and the status of the CISD website in meeting those requirements.

The status information in **Exhibit 6-5** was not easily located. The district website does not have a site map showing the arrangement of web pages by topic. The district also does not include an organizational chart or general explanation of department responsibility that would provide visitors with some expectation of which link might provide the information sought.

The 2008–2011 CISD Technology Plan sets as a technology objective, improving the school to home connection. Campuses are supposed to provide translation software for communicating with parents, and the website is expected to be user-friendly. The district home page has a translation link, but no clear instructions. The link is a free application provided by Internet provider Yahoo!™ called Babel Fish. The link includes pictures of international flags. Clicking on the appropriate flag should translate the page into that language, but the only text translated on the home page was the sentence, “if you are having trouble viewing the page please click here.” If you navigate away from the home page, the Babel Fish icon is not available.

The free translation application works well if the web page is primarily text and not pictures. However, to translate other

district web pages, the visitor must take several additional steps. On the home page the fish icon must be selected. Then, instead of selecting a flag, the application itself must be selected by double clicking in another area of the Babel Fish box. A new window opens that allows a visitor to type or paste in selected text for translation, or, if the visitor knows the specific web page address, the address can be entered for an entire page translation. The visitor must select the translation path, such as English to Spanish, before entering the command to translate. However, the CISD web page with immunization instructions, required to be in both English and Spanish, translated nicely to Spanish using this method.

A quality web presence can be a good first impression and an ongoing positive contact. Freer ISD provides statutorily required notifications on its home page as part of district announcements, and provides brief explanations of the links. Freer ISD directory information includes office hours as well as contact information for staff. Pearsall ISD has a translator function on its home page that quickly converts the site to the selected language. Quanah ISD makes use of various menu and tab organizers to provide numerous options for navigating the site.

CISD should identify a single point for accountability for the website, task that position with ensuring minimum legal requirements are met, and develop tools for schools and departments to ensure timely update of information. The Webmaster should develop a list of technology liaisons responsible for updating the department webpage areas. An email should be sent to liaisons at regular intervals to ask if anything new has happened that would require a change to their department webpage. The Webmaster should also be responsible for seeing that departments know what information is mandated, and when it should be updated.

Working with the district Technology Committee, the Webmaster should develop a consistent look for the site as well as a user-friendly layout that connects visitors with information easily and intuitively. A link should be provided on the homepage that allows visitors to report incorrect or out of date content, or make suggestions for improvement. The district should also explore adding a quick poll of two or three questions for site visitors, such as “did you find the information you wanted” and “was the site easy to navigate.”

Finally, the site should have a more effective and easily used language translator. The Webmaster should research various translator applications and the costs, and present the

**EXHIBIT 6-5
TEXAS EDUCATION CODE SAMPLE WEBSITE POSTING REQUIREMENTS
2010–11**

CITATION	REQUIREMENT	CISD STATUS
Education Code §11.1513	Posting notice of vacant positions at least 10 days prior to filling position.	Vacant positions posted.
Education Code §21.204	Board employment policies must be posted.	Employee handbook posted. Link to Board Policies through Texas Association of School Boards (TASB) Online.
Education Code §22.003	Posted employee handbook must include information on assault leave.	Posted handbook includes assault leave policy.
Education Code §22.004	If not participating in the state uniform group coverage program, must post insurance contract information.	CISD participates in the uniform group coverage program and provides benefit information in its posted employee handbook.
Education Code §28.004(k)(1)	Must post statement of policies for student physical activity.	Posted in the student handbook available online.
Education Code §28.004(k)(2)(A)	Number of times the School Health Advisory Council met the previous year.	Posted in the student handbook available online.
Education Code §28.004(k)(2)(B)	Whether district has adopted and enforces policies to ensure campuses comply with vending and food service guidelines for restricting student access to vending machines.	Posted in the student handbook available online.
Education Code §28.004(k)(2)(C)	Whether the district has adopted and enforces policies and procedures prescribing penalties for use of tobacco products on campus or school sponsored events.	Posted in the student handbook available online.
Education Code §28.004(k)(3)	Notice to parents that they can request in writing their child's physical fitness assessment results at the end of the school year.	Posted in the student handbook available online.
Education Code §29.916	Notice of dates for the PSAT/NMSQT and college advanced placement tests with a statement that the tests are available for home-schooled students in the district and the procedure for registering.	Notice of test date for PSAT on high school counseling webpage. No information on the district calendar and no home-school student information. No information on advanced placement test for 2011. Notice for May 2010 did not include home-school notice.
Education Code §38.019(a)(1)(A) and (B)	In English and Spanish, and prominently posted, immunizations required or recommended for public schools.	Posted as a link to "health requirements" under web pages for Parents or Prospective Parents. Link brings up Department of Health Services list in English and Spanish.
Education Code §38.019(a)(1)(C)	In English and Spanish, and prominently posted, a list of area health clinics offering influenza vaccination.	List of clinics posted on the Parent and Prospective Parent web pages related to enrollment. Parent web pages are not provided in English and Spanish.
Education Code §38.019(a)(2) and §38.019(a-1)	In English and Spanish, and prominently posted, a link to the Texas Department of State Health Services for obtaining an exemption from immunization requirements.	No link posted.
Education Code §39.084	Copy of adopted budget with a prominently displayed link. Post must remain until the third anniversary of the date of adoption.	Adopted budget not found.
Education Code §39.362	Not later than 10th day after first day of instruction campus and district "report card" information; and, most recent accreditation status and explanation.	Home page provides link to accreditation status. Academic Excellence Indicator System (AEIS) report with explanation posted; notice and explanation of accreditation status.
Education Code §44.0041	Budget summary for proposed budget with comparisons to previous year.	Posted for 2007–08 and 2009–10.

SOURCE: Texas Legislature Online, www.statutes.legis.state.tx.us.

information to the Technology Director. After testing various solutions, the Technology Director should make a recommendation to the board.

This recommendation can be implemented with existing resources.

IMPROVING TECHNOLOGY PURCHASING PROCESSES (REC. 39)

CISD's technology procurement process is not well defined, and does not provide sufficient communication or controls to ensure timely provision of needed technology. Purchases are made through central administration, but the procedures are not clearly communicated to staff. At the school and department level the lack of documented procedures for technology purchases has contributed to confusion and, on occasion, delays in receiving requested technology.

ACQUISITION AND MAINTENANCE STRATEGIES

The Technology Department does not have planned acquisition strategies to support the activities in the technology plan. For example, the CISD plan strategy 6.1.3 identifies a one-to-one student to computer ratio objective. The district currently has a 2:1 student to computer ratio achieved with a combination of fixed labs and mobile carts shared by students.

The one-to-one initiative started with the assignment of computers to middle school students. The assigned computers will stay with the student through the remainder of his or her schooling in CISD. As those students move into high school the one-to-one ratio will continue to expand by grade until gradually, the high school will also meet the target ratio.

Middle school students in the one-to-one initiative currently have a smaller sized laptop. In interviews, the Technology Director discussed purchasing larger student laptops in the future, although there was not specific educational analysis. After the school review team visit, the Technology Director stated CISD would be utilizing needs assessment surveys and the Technology Committee to make the necessary recommendations. There are no formal guidelines for upgrading or replacing student assigned computers, but staff anticipates that students will be able to keep their assigned laptop as an incentive for graduation.

All teachers have laptops. According to the Technology Director, as the laptops reach three years of service they will be replaced. The older, replaced laptops will become temporary replacements or "loaners" when newer computers

break. In an interview, the Technology Director said the district does not have a formal technology replacement schedule but at three years, laptops were old technology.

At the high school, the computer lab is equipped with donated, used technology, some of which are missing parts. There is no documented plan for replacing or phasing out the older technology. New hardware is purchased with older operating systems that will no longer be supported by the manufacturer. The older operating system works with the current district software, and there is no plan for upgrading software or operating systems. The manufacturer will stop developing security patches, placing computers with the non-supported operating system at risk.

The Technology Department is also developing a student computer take-home program for the one-to-one initiative. This will increase the repair and maintenance workload as computers are exposed to bus rides and breakfast tables, and network outages affect homes as well as schools.

The Technology Director does not have a multiyear acquisition plan that identifies hardware that needs replacing, the year of replacement, and the estimated cost of replacement. The district does not differentiate between educational technology and administrative technology for purposes of setting replacement cycles or standardization of software and hardware. Although the district has a Technology Committee comprised of technology and educator staff, there are no identified educational priorities for determining if aging high school computers should be replaced before newer teacher laptops, or if a take-home computer project is a better use of staff resources than expanding a different technology project.

A technology acquisition plan is an orderly method for keeping technology current and placing the strongest resources at the point of greatest need. Many organizations adopt a schedule for replacement and down streaming of technology, staggering replacements to manage the cost over several years. Without acquisition planning, productivity may decrease if older technology is replaced too slowly, or costs may increase if technology is replaced too frequently.

The district has general policies which describe the types of procurement authorized. Purchasing methods are based on the dollar amount of the annual aggregate expenditure for the type of item. The board's purchasing policy meets statutory requirements for purchasing. For example, board policy authorizes a number of procurement methods such as competitive bidding, competitive sealed proposals, or an

interlocal contract with another government agency. The district can also use the Texas Department of Information Resources' contracts when purchasing technology products.

The district has a purchase order process where authorized staff can requisition equipment and supplies. Purchase order requests are reviewed centrally for accuracy and timely submission. Purchase orders that do not meet submission requirements are refused or returned for correction.

As part of the central administration purchase order process, the Technology Director approves district technology purchases. School districts receive state funding for certain types of technology purchases, and the Technology Director is responsible for the application process. Errors in application, such as purchases not covered by the funding program, can result in denial of funding.

The Technology Department has developed an evaluation matrix for selecting technology vendors. The matrix provides general categories and weights, which are: price (30 percent), completion of district procurement worksheet (15 percent), compatibility of equipment (15 percent), vendor reputation (20 percent), and support staff within 100 miles (20 percent). There are no scoring mechanisms for determining total cost of ownership. For example, the life cycle cost of equipment with a one-year warranty and annual maintenance contract is not compared to the life cycle cost of equipment with a lifetime warranty requiring no additional maintenance. The reliability of one product over another product and the productivity costs associated with non-working equipment are not formally considered.

The Technology Director's decision-making process is informal. There are no procedures for deciding between a publicly advertised competitive bidding process, and an informal telephone solicitation by the Technology Director. As another example, there are no directives for bundling requests to obtain more favorable bulk pricing or reduction in delivery costs.

In interviews, school staff related several instances where purchasing processes delayed or halted delivery of anticipated items. In one example, teachers were told to place orders at the end of the school year in advance of the upcoming year's needs. Orders were placed and lesson plans developed over the summer. Upon return to the new school year, teachers were told all requests had been denied as they were not submitted timely. In another instance a design class with six computers did not have the design software for its 20 students until well after the start of the school year.

Teachers do not always receive an explanation for delay or rejection in purchasing requests. The district added a class in computer animation for the 2010–11 school year, but the necessary computer application that supports animation had not been provided. The teacher providing this example did not know why the purchase was refused. Since the school review team visit, the Technology Director stated the purchase was not rejected, but that an amendment had to be submitted to the TEA for the purchase, and that it was in the final approval process.

CISD does not have documented standards for technology acquisition, although computers and other technology components must be capable of working together. Hardware must have the speed and memory to run software and systems. Acquisition standards provide a foundation for purchasing, providing guidance to staff on hardware and software that has been approved for use. Standard configurations increase efficiency of technology staff, reducing time for problem resolution.

Without defined standards, procedures, and timely communication, staff are less productive. If district infrastructure cannot support applications necessary for lessons, student and staff time in class is less effective. Without accessible and accurate procurement deadlines, or information on how long procurement processes take, staff cannot time requisitions to ensure the items will arrive when needed.

Ysleta Independent School District (YISD) has developed and adopted Technology Hardware and Acquisition Standards. The standards identify positions responsible for review and approval of purchases, provides a checklist of considerations when making a technology purchase, and allows for customization so long as minimum standards are met. Donated equipment must also meet adopted standards. The district documents the different processes with a chart that shows the steps for purchasing in different categories such as laptops or printers. The standards cite the benefits of standardization, which includes the ability to negotiate volume pricing, decreasing processing costs, and decreasing support and training costs. Ysleta ISD posts the standards document on its website, which provides easy access for staff and program accountability for parents and the community.

CISD should develop and document a procurement process, which includes the adoption of minimum hardware requirements, that outlines the steps and considerations necessary for timely delivery of technology purchases, and

publish the information on its website. Working with technology staff and school technology coordinators, the Technology Director should adopt minimum standards for the types of technology it purchases. The standards should be incorporated into a procedures document that includes instructions and timelines for technology purchases. Procedures should include timely notification to the requisitioning staff of any problems with the purchase, and instructions on how to correct any deficiencies. Technology staff should develop performance metrics, such as the time between requisition and its submission deadline, the error rate on requisitions, and the time between requisition and purchase, for ongoing improvement of processes.

Staff should also develop internal Technology Department guides for the purchasing process. Guidelines should identify purchases appropriate for informal solicitations and purchases, and those which should be made through competitive bidding. As part of the process, the director should develop forms to capture vendor information received and compared in telephone solicitations, and expand the evaluation matrix to include information for considering the life cycle and productivity costs of the purchase.

This recommendation can be implemented with existing resources.

DOCUMENTING ESSENTIAL OPERATIONS (REC. 40)

CISD does not have documented processes and procedures necessary for effective administration of an IT department. The CISD board has developed districtwide policies through the Texas Association of School Boards (TASB). TASB provides policy-drafting guidance which is compliant with state and federal law. Policies are generally applied, and school districts using the policy service then develop district specific procedures that provide the framework for daily operations. CISD has not developed its procedural framework, leaving the district at risk for inefficiency and loss.

In interviews, technology staff said the primary technology-based policy is the Acceptable Use Policy which informs students and staff of acceptable and unacceptable technology use. The Technology Department does not have documented procedures for many of the processes necessary for effective department management. **Exhibit 6-6** shows sample technology management practices, and the district status in documenting its practices.

While technology staff is performing some essential management tasks, as shown in **Exhibit 6-6**, procedures for performing them are not readily available to new staff, or for cross training for current staff.

Documenting procedures allows users to get quick answers to common questions, and when end-users can help themselves, technology resources can be more efficiently deployed. How-to guides also make cross training and new staff training easier. Cushing Independent School District documents standard operating procedures, tips for instructional staff, implementation information on new technology and other helpful information. Standard operating procedures include receipt of new equipment and adding to inventory, cleaning and disposing of old technology, and virus scanning.

To reduce errors and assure continuity of service, CISD should draft policies and essential procedures for clear understanding and ease of use by staff and end users. Procedures for end-users should include policies for adding or downloading applications to district computers, using social media, records retention, as well as answers to frequently asked technology questions, and how-to guides for basic processes. Technology staff should develop standard operating procedures for routine tasks such as backing up district data, responding to work orders, maintenance schedules, and network configuration. Where applicable, procedures should align with and reference related board policies.

This recommendation can be implemented with existing resources.

TRAINING AND SUPPORT STRATEGIES (REC. 41)

CISD has not clearly defined departmental plans for obtaining training for technology staff or providing technology training to school and administrative staff. Successful implementation of the district technology plan requires adequate training for both technology staff and educational staff. Without adequate training, efficiencies gained by introducing technology into a process are not realized as the tools are not fully utilized.

The Webmaster and the Technology Director provide training for district staff. Much of the training is one-on-one, teacher to technology staff. Teachers can place work orders for training, and can call technology staff at home for problem specific advice. The Webmaster also provides after hours technology training for the community, and CISD

**EXHIBIT 6-6
TECHNOLOGY MANAGEMENT POLICY AND PROCEDURES
2010-11**

MANAGEMENT PROCESS	CISD STATUS	IMPACT
Network configuration plan	Network schematic documents 2006 configuration. No updated schematic showing current configuration. No schematic or other documented plan showing optimum or goal configuration.	Network may grow beyond staff ability to timely monitor or maintain. May not have the most effective configuration for the money spent.
Technology Standardization policies	None. Informal policies for moving to Dell products, but no specific standards on memory, operating systems, wireless integration, standard software, or other variables.	Can result in increased costs to maintain as staff must have diverse knowledge base. No assurance that purchased technology will meet needs, or will need additional upgrade expenditures to meet needs.
Maintenance and replacement schedules	None documented. Inventory lists are maintained, but do not provide information on year purchased. Informal policy on replacing laptops at three year intervals, and buying extended warranties for four year periods.	Regular maintenance extends equipment life and reduces risk of unplanned outages.
Inventory control	Students and parents sign an accountability agreement. No assignment or accountability policies were identified for staff. Inventory spreadsheets are not complete. Some serial numbers are missing. Student assigned computers do not reflect assignment on inventory lists.	Personal assignment agreements should be associated with the inventory information for tracking purposes. Inventory should be updated annually to reduce risk of loss.
Operating procedures for daily activities	One 12-year staff member has lengthy institutional memory. Daily operational processes or procedures are shared among staff. None are documented.	Written procedures ensure staff understands activities that must be performed and the schedule for performance. The effect of staff turnover can be minimized.
Trouble-shooting guides	No district developed guides for frequently asked questions, fixes for most frequently seen problems, or practical tips.	Staff time is spent on minor issues easily attended by end-users, affecting productivity and amount of available time for other tasks.
Records retention	None. Currently, 12 years of data resides on district servers.	In addition to storage costs, district data maintained on servers, computer hard drives, and cell phones are subject to Public Information Act requests and state records retention regulation.
Calls for service evaluation	Work order system captures call data and technology staff informally report and discuss suggestions for improvement. No regular procedures for evaluating calls for service and targeting solutions for repetitive problems.	A process for evaluation against performance metrics is a management tool in developing repair or replacement strategies, assessing training or how-to tools, or identify planning and budget issues.
Acceptable use of technology	Guidelines are adopted and required to be acknowledged in an employee agreement.	Policies reduce the risk of misuse, and set clear privacy expectations for monitoring and search of district technology.
Disaster recovery plan	Plan developed in 2010. District has redundant back up at separate locations. Each system has uninterrupted power source (UPS) in the event primary power fails. There are no procedures for periodic review and revision.	Plan to safeguard data has been implemented, but should be periodically reviewed and updated to reflect current contact information, responsibilities, and hardware/software configuration.

SOURCE: CISD interviews with technology staff, 2011.

employees also attend those sessions. The Webmaster estimates 20 percent of her time is spent training. In addition to the in-person training, CISD provides web-based training through a software product called PD360, which staff can use on their own schedule. Despite the various on site and online training options, educator staff ranks technology training as in a developmental stage.

Technology staff must have the knowledge to be able to troubleshoot problems in both hardware and software used in the district. Technology staff trains on updates to system applications, but does not have expertise on curriculum-based software. Technology staff is not trained on educational software and is not always an effective resource when problems arise. The Network Administrator tries to address requests but lacks the curriculum component needed to address some questions.

Training on education-based software is not coordinated between curriculum and technology staff. In August 2010 the Technology Department provided a technology mini-conference, which was well received. The conference was scheduled in conjunction with district summer teacher training, although technology training is not a regular summer event. Scheduling can be a challenge as many CISD teachers are on 10-month contracts. Those 10 months comprise the school year, and when a teacher is absent for training a substitute may be required. Technology training must also compete with staff meetings, planning meetings, student activity sponsorships, and other activities for educator time.

CISD has been losing approximately 20 percent of its teachers each year. With high turnover in staff, training needs are persistent. The district has 32 education related software programs to introduce to new staff. Technology staff said they are too busy to get additional training or new technology certifications. Teachers say technology staff is not trained on certain educational software, and cannot always help with a software related problem.

Texas school districts use different methods for bringing technology knowledge to staff. Cushing ISD provides 18 hours of scheduled technology training each year. Round Rock ISD provides an Internet wiki where teachers can post ideas and information they have developed. Lufkin ISD provides Internet training modules on software used by the district, with a brief quiz to ensure important information was understood.

CISD should implement a multi-tiered technology training program that includes curriculum application support. Training should include annual group sessions, web-based training, and opportunities for knowledge sharing among staff. While training should focus on educator needs, support staff should also receive technology training on both infrastructure and software.

New employee training should include a basic introduction to software programs they will use. Because this training is repetitive, the district should consider developing the training as a video presentation, a series of podcasts, or other medium that will service a revolving audience.

The Technology Department should develop annual educator training based an analysis of work orders and calls for service. Working with principals, the Technology Director should determine how many hours of training should be offered annually. Once an outline and tentative schedule has been developed, the Technology Director should meet with the Assistant Superintendent for coordination with other educator training.

The Webmaster should expand the use of the district website to include frequently asked questions about hardware and software, and step-by-step instructions on frequently used programs. The Webmaster should also explore the development of wikis or other programs that allow for collaboration and the sharing of knowledge among coworkers on the district website.

A fiscal impact is not assumed in this recommendation. Once the district determines which actions to pursue, the costs or savings should be considered in the implementation.

PROTECTING HARDWARE ASSETS (REC. 42)

CISD does not fully protect its servers, switches, and other hardware, placing it at risk for damage. Technology is located in areas accessible to non-technology staff and students. Storage rooms with technology cabinets have been converted to offices, and in some cases hardware remains in areas under construction.

A tour of district schools revealed access concerns. The Technology Director does not have keys to computer equipment rooms, but has to wait for custodians with keys to the computer rooms to open the doors. At the middle school servers have small, dedicated rooms not used for other purposes. Although custodians have keys, these rooms are not cleaned. Floors and equipment showed large dust

deposits, indicating that the air handler might not be filtering particulates in the air.

At the high school, not all cabling cabinets close and lock and not all cabling cabinets are located in a dedicated or limited access location. In one building the cabling cabinet is located in a storage room that is also used by students borrowing laptops from a mobile cart. In another building, the server room was shared with district staff, so the thermostat was adjusted for human comfort and not technology cooling requirements.

In a third building the storage room holding the cabling cabinet has been converted to a nurse's station, and computer equipment was observed in an area under construction. While the construction and storage room conversion is expected to be temporary, the risk of mischief or inadvertent damage is greater when the technology is easily accessible to students, staff, or vendors servicing the school.

Technology requires a controlled environment to function optimally. Overheated equipment can reduce server performance. Dust in equipment connections and vents can contribute to overheating and other failure. Technology is a substantial investment, and many organizations protect the investment by placing technology in areas with adequate environmental and access controls.

CISD should develop standards for security and accessibility of technology even when temporary moves and assignments occur. The Technology Director should assess the environment in each area housing technology to determine the risk to equipment, and develop procedures to minimize the risk. For example, access to computer only rooms should be limited to technology personnel. Servers should not be co-located with school staff, and computer rooms should be temperature controlled.

A fiscal impact is not assumed in this recommendation. Once the district determines which actions to pursue, the costs or savings should be considered in the implementation.

FISCAL IMPACT

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

RECOMMENDATION	2011-12	2012-13	2013-14	2014-15	2015-16	TOTAL 5-YEAR (COSTS) SAVINGS	ONE TIME (COSTS) SAVINGS
36. Develop a detailed work plan that supports the more general activities in the district technology plan.	\$0	\$0	\$0	\$0	\$0	\$0	(\$4,000)
37. Develop an implementation process for technology projects that includes effective communication and end-user feedback components, and provide training to staff on the processes.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
38. Identify a single point for accountability for the website, task that position with ensuring minimum legal requirements are met, and develop tools for campuses and departments to ensure timely update of information.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
39. Develop and document a procurement process that outlines the steps and considerations necessary for timely delivery of technology purchases, and publish the information on its website.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
40. Reduce errors and assure continuity of service by drafting policies and essential procedures for ease of use by staff and end-users.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
41. Implement a multi-tiered technology training program that includes curriculum application support.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
42. Develop standards for security and accessibility of technology even when temporary moves and assignments occur.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS	\$0	\$0	\$0	\$0	\$0	\$0	(\$4,000)

CHAPTER 7

SAFETY AND SECURITY

COTULLA INDEPENDENT SCHOOL DISTRICT

CHAPTER 7. SAFETY AND SECURITY

A learning environment must also be a safe environment. School districts are responsible for the safety of students and staff, and the security of district property. To reduce the risk of harm, schools must create a plan, implement the plan, and practice the plan.

Cotulla ISD (CISD) boundaries include two primary cities: Encinal and Cotulla. Neither Encinal nor Cotulla has its own Police Department, but the county has a strong law enforcement presence with the LaSalle County Sheriff's Office, four county Constables, the Texas Department of Public Safety, and U. S. Border Patrol agents. In 2009, LaSalle Sheriff's Office reported 70 crimes. Theft related crimes comprised approximately 73 percent, 2 percent were burglaries, and approximately 4.2 percent were aggravated assaults. A state prison facility is located in La Salle County.

LAW ENFORCEMENT OPERATIONS

LaSalle County law enforcement services the district and the surrounding county. CISD does not have a school Police Department, but has a School Resource Officer (SRO) commissioned by the LaSalle Sheriff's Office. This configuration provides the district with on site law enforcement, without the additional costs associated with running a police department.

The district also contracts with a private company for contraband-locating dog services. The dogs have located controlled substances, but staff does not believe the occasional find signals a district problem with illegal drug use. In addition to these enforcement efforts, CISD has a drug and alcohol testing program for its students. Testing is random, and is required in order to participate in extracurricular activities or to have parking privileges on district property.

The school review included a survey on school safety. **Exhibit 7-1** shows attitudes toward district enforcement efforts regarding the effectiveness of drug and vandalism issues.

At 57.2 percent, the majority of responding administrators believe the district does a good or excellent job at addressing any drug issues. A third of surveyed teachers agree at 33.3 percent. Students responded to the question with 31.9 percent finding district drug efforts good or excellent, and parents have the lowest level of confidence with 29.6 percent believing district efforts are good or excellent.

Over 90 security cameras, strategically stationed inside and outside district buildings, protect district property. Schools lock auxiliary doors, funneling visitors through a single entrance by the office. Visitors must show identification, which is checked for criminal history before they are allowed in student areas. As shown in **Exhibit 7-1**, 20.9 percent of teachers found district efforts at reducing vandalism below

EXHIBIT 7-1
CISD SAFETY AND SECURITY SURVEY RESPONSES
FEBRUARY 2011

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
The district's effectiveness in addressing drug issues if they exist.						
Administrators	0.0%	0.0%	42.9%	42.9%	14.3%	0.0%
Teachers	6.3%	16.7%	27.1%	22.9%	10.4%	16.7%
Parents	11.4%	13.6%	36.4%	20.5%	9.1%	9.1%
Students	15.1%	6.6%	39.8%	25.3%	6.6%	6.6%
The district's effectiveness in addressing vandalism issues if they exist.						
Administrators	0.0%	0.0%	42.9%	42.9%	14.3%	0.0%
Teachers	4.2%	16.7%	29.2%	27.1%	10.4%	12.5%
Parents	8.9%	8.9%	40.0%	22.2%	8.9%	11.1%
Students	15.1%	11.4%	41.0%	15.7%	5.4%	11.4%

NOTE: Percentages may not add to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

average or poor, while no administrators ranked the district's efforts below average.

ACCOMPLISHMENT

- CISD has teamed with LaSalle County to provide a state commissioned law enforcement officer at the district, with little additional cost.

FINDINGS

- CISD does not have a comprehensive safety planning process that aligns safety plans with a single point of contact, nor does it systematically budget for these initiatives.
- CISD lacks a comprehensive planning and training approach in behavior management to ensure students and staff have adequate tools available to focus instructional time on learning rather than discipline.
- The district's attendance process does not hold parents and students accountable for student absenteeism and there is minimal communication between CISD and the district court, which has jurisdiction over family law cases.

RECOMMENDATIONS

- **Recommendation 43: Develop and implement a safety planning process with oversight authority to a single coordinating position and integrate the process with spending priorities.**
- **Recommendation 44: Revise behavior management strategies in the district and campus improvement plans that are tailored to the schools' disciplinary profile and ensure all teachers receive training in positive behavior intervention and discipline management.**
- **Recommendation 45: Create a more comprehensive process for truancy reduction, and develop agreements with local officials for assistance in enforcing compulsory attendance laws.**

DETAILED ACCOMPLISHMENT

SHARED COSTS OF SCHOOL RESOURCE OFFICER

CISD has teamed with LaSalle County to provide a state commissioned law enforcement officer at the district, with little additional cost. In 2009, CISD hired a School Resource Officer (SRO) and the county sheriff commissioned him as a

reserve deputy. Prior to the collaboration, CISD had an unruly student population, and local law enforcement responded to calls of criminal activity on district property.

School staff had to manage misbehavior constituting minor criminal conduct such as truancy and disorderly conduct, if local law enforcement was not immediately available. CISD discussed options for providing a consistent law enforcement presence and decided to staff a new position with a respected, retired local law enforcement officer. The position is the district truancy officer and School Resource Officer.

The state of Texas sets minimum education and character requirements for certification as a law enforcement officer. State requirements for certified officers who want to work as a law enforcement officer include a commission by an authorized agency such as a Sheriff's Office or Police Department. The Texas Education Code allows school districts to commission officers, but commissioning also brings responsibility for state law enforcement reporting and other agency requirements. The Texas Local Government Code authorizes sheriffs and constables to commission reserve deputies, who provide unpaid part-time services to the commissioning office.

The district SRO is a commissioned reserve deputy sheriff responsible to the district for responding to criminal activity on district property. The position is responsible to the LaSalle County Sheriff for responding to calls for service on district property, making arrests, and completing any necessary reports.

CISD and the Sheriff have entered into a mutually beneficial arrangement for district law enforcement services. The district and the Sheriff have agreed upon the policies that control the SRO's law enforcement actions. The district directs the SRO's daily assignments, but once law enforcement action is needed, the SRO takes on the role of deputy and responds. The Sheriff's Office likes having a deputy that can respond without reducing patrol resources. CISD likes having a law enforcement presence without associated departmental costs. Local resources are efficiently deployed, and at little additional cost for either entity.

DETAILED FINDINGS

PLANNING SAFETY PRIORITIES (REC. 43)

CISD does not have a comprehensive safety planning process that aligns safety programs through a single point of responsibility for implementation, nor does it systematically

integrate safety initiatives into district long-range plans for budget and spending priorities. A safe and secure district must cover a wide range of issues from student conduct to worker safety to external threats such as intruders. CISD does not task any particular position with primary safety oversight to ensure the wide range of issues are identified, budgeted, and addressed as an appropriate priority among other competing needs.

The district has approached safety planning in a piecemeal pattern through different avenues. At the time of onsite work, the district's safety planning consisted of the District Improvement Plan (DIP) and campus Emergency Operation Plans (EOPs).

While the DIP includes a safety goal and seven strategies, it is essentially an educational delivery plan and therefore is not a coordinated safety process for identifying and addressing other safety and security problems that do not directly affect the classroom.

Exhibit 7-2 outlines the DIP's safety strategies for achieving its goal of providing "a safe school environment that fosters mutual respect of all stakeholders."

As noted in **Exhibit 7-2**, principals are identified as the primary point of responsibility for the school-based safety strategies, with assistance from other sources depending on the nature of the task. CISD also recognizes a safety committee for some activities. For example, an employee safety committee meets to discuss workplace safety for district staff. The safety strategies in **Exhibit 7-2** do not include all safety or security activities in the district, but reflect those directly related to student learning.

In addition to the DIP process, districts are required to undergo self-administered Security Audits every three years. CISD conducted its first security audit in 2008. In this audit, all four campus EOPs were reported to have completed anywhere from 87 percent (Cotulla High School, Ramirez Burks Elementary) to 89 percent (Newman Middle School, Encinal Elementary) of their emergency plans. **Exhibit 7-3** shows safety and security concerns raised in CISD's 2008 audit and the district's response.

Despite the progress noted in **Exhibit 7-3**, the district has gaps with no communicated plans to either implement or defer implementation and accept any associated risk as a lower priority behind other expenditures. For example,

EXHIBIT 7-2
DISTRICT IMPROVEMENT PLAN SAFETY ACTIVITIES AND STRATEGIES
2010–11

ACTIVITY/STRATEGY	PERSON(S) RESPONSIBLE	TIMELINE	BUDGET RESOURCES	EVALUATION METHOD
Conduct monthly scheduled fire drills	Assistant Principal	Monthly as Required	None Identified	Report of monthly drills
Conduct lockdown training	Principal, Assistant Principal	Monthly as Required	None Identified	Training sign in sheets and drill reports
Conduct safety training on accident prevention and use of hazardous materials	Principal, Assistant Principal	As Needed	Local and Federal Funds	Training sign in sheets and certifications
Provide training on discipline management and conflict resolution	Principal, Assistant Principal, Counselors	Summer 2010–11 and as Needed	Local and Federal Funds	Training sign in sheets and certifications
Develop a school wide plan to provide Safe and Drug Free Schools and character education lessons	Principal, Assistant Principal, Assistant Superintendent	Monthly	Local and Federal Funds	PEIMS 425 Report
Provide Student Random Drug Testing Program for Students in Extracurricular Activities	Principal, Assistant Principal, Sponsors	Monthly	\$15,000 in Local Funds	Final Report
Include counseling for student and staff development to deal with persistent discipline problems	Principal, Assistant Principal, Counselor and staff, Assistant Superintendent	Quarterly and as Needed	Local and Federal Funds	Discipline records and surveys of staff and students

SOURCE: CISD District Improvement Plan, 2010–11.

**EXHIBIT 7-3
2008 SAFETY AND SECURITY AUDIT STATUS**

CONCERN	CISD RESPONSE	STATUS
Burglary and vandalism	Add cameras to all campuses.	Prior to the 2008 audit, two cameras were purchased and installed by a campus principal. Subsequently, all campuses were provided with primarily exterior cameras. The more than 90 cameras are not monitored, but images are reviewed if an incident occurs.
Student and staff safety	Added "Lobby Guard" to electronically check visitor criminal history and print a photo badge authorizing entrance.	Program has been implemented in each school. Staff collects badges when visitors leave. Check-in procedures also include vendors. There are slight variations in how each school processes visitors.
Building security	Locked multiple entrances. Required identification cards for students and staff. Added biometric time clock. Added electronic key cards at some locations, and "do not duplicate" keys at other locations. Is discussing the possibility of fencing around schools.	Staff still periodically props open locked doors or allows a family member to bypass the identification procedures. Some staff are resistant to "clocking in" despite the emergency management value of the information.
Crisis management and emergency response guides	Regularly perform crisis drills; increase emergency management training.	Crisis drills have been performed. Staff has attended some emergency management training. The district has not maintained a crisis plan which would include up to date emergency response guidelines.

SOURCE: CISD Safety Audit 2008; Interviews, CISD staff, February 2011.

classroom windows at the high school randomly fall out of the frame onto the ground. As a temporary measure, the district has placed additional screws in the windows. While this has secured the windows from falling, in an emergency, the windows cannot be opened and used as an escape route. Replacing windows is a physical security concern, but it also competes with educational priorities. Although some items identified in the audit were incorporated into the DIP, there is no identified process for aligning recognized safety issues with those identified in the DIP.

The next safety audit is due August 31, 2011 and results need to be reported to the Texas School Safety Center (TSSC). Between audits, TSSC recommends that school districts monitor progress on correcting safety issues found by the previous audit and identify any new issues that might have developed. CISD does not have a position tasked with making sure identified issues have been corrected, or for addressing developing issues in advance of the next required audit.

In December 2010, the Director of Student Services was given the additional assignment of safety coordinator in anticipation of the 2011 safety audit. The previous safety coordinator did not perform interim status checks on the 2008 audit, although CISD did address many of the audits concerns. Despite the periodic appointment of a position as safety coordinator, CISD does not have a single point of oversight for safety, security, and discipline management

issues tasked with making sure competing department level interests are prioritized, scheduled, and budgeted. While the Director of Student Services appears to be the current position responsible for planning and oversight across the district, the coordinator does not have a budget for this function. The law enforcement officer that reports to the Director of Student Services is not budgeted in that department and in 2011 the Assistant Safety Coordinator was reassigned to the Transportation Department without notice to the security audit coordinator.

When CISD reassigned the safety coordinator duties to the Director of Student Services, the director started developing the emergency operations plans for the upcoming safety and security audit of August 2011. According to the Texas Education Code (TEC) §37.108 (a), "Each school district or public junior college district shall adopt and implement a multi-hazard emergency operations plan for use in the district's facilities." Texas school districts must complete a safety and security audit of district facilities by August 31, 2011. CISD's emergency operation plans and procedures were completed in March 2011.

Although the Director of Student Services position has safety responsibilities related to emergency operations and safety training, the district has not given the safety coordinator position authority for ensuring the wide range of district safety issues that should be budgeted and timely addressed. The safety coordinator has some areas of districtwide

oversight, but not all safety and security projects are coordinated through this position.

Without effective coordination and planning of safety issues throughout the district, one or more of the numerous safety related requirements may be missed. For example, the Safe and Drug Free Schools (SDFS) planning activity in the DIP resulted from a finding that the district was not conducting an adequate level of SDFS activities required for federal funding. Moreover, the district has expressed a concern about the open high school campus and its proximity to a correctional facility, but does not have any short or long term plans to address the concern or research whether the cost of a fence outweighs the risks associated with its concern, or whether a fence is more important than competing educational interests, and has not tasked any particular position with finding these answers for this or other districtwide concerns.

The Texas School Safety Center provides numerous guidelines, best practices, and templates for assessing, developing, and implementing safety planning and implementation practices. School districts can find safety training as well at www.txssc.txstate.edu.

CISD should develop and implement a safety planning process with oversight authority to a single coordinating position and integrate the process with spending priorities. The district's assignment of safety coordination to student services provides a natural alignment of educational with physical safety and security concerns. The Director of Student Services is also responsible for district health initiatives and the Student Health Advisory Committee, providing a single position that participates in potentially overlapping areas.

The superintendent should assign the authority and responsibility for oversight of safety and security related projects and strategies to the Director of Student Services. While the safety coordinator function would not need to control the budget for all safety and security expenditures in all departments, at a minimum it should chair the safety committee and participate in educational goal setting and budgeting meetings pertaining to safety and security.

Additional responsibilities to include within the safety coordinator function should include:

- Developing a safety planning process that identifies and coordinates the various educational and departmental needs or requests into a comprehensive plan.

- Evaluating and coordinating concerns identified in the 2011 safety audit alongside any new projects resulting from the Safety Committee update of the crisis management plan.
- Coordinating safety training and associated costs with other educator training.
- Incorporating participation by maintenance and transportation into the safety planning process to ensure that safety and security concerns in those departments are included in the evaluation and prioritization process.

This recommendation can be implemented with existing resources.

DISCIPLINE MANAGEMENT (REC. 44)

CISD lacks a comprehensive planning and training approach in behavior management to ensure students and staff have adequate tools to focus instructional time on learning rather than discipline.

While the district uses a variety of methods to approach behavior management, the district is inconsistent in its planning efforts and training programs for all instructional staff and students. The extent of the behavior management problems in the district is demonstrated through the teachers, parents, and student's perception of how behavior management is handled in the classroom and by the district. A survey conducted by the review team regarding safety and security indicates that on average, slightly more than one third of teachers, parents, and students perceive the district does a below average or poor job in disciplining students fairly and consistently as seen in **Exhibit 7-4**.

Currently the district approaches student behavior primarily in the following ways:

- Strategies in the District and Campus Improvement Plan(s);
- District Student Code of Conduct with delineated consequences; and
- Computer policy on appropriate use of computers.

The CISD District Improvement Plan (DIP) (Goal 3) and the corresponding Campus Improvement Plans (CIPs) however do not offer a comprehensive approach to discipline reinforcement or management, as seen in **Exhibit 7-5**. Additionally, the 2009–10 Special Education Continuous Improvement Plan does not address discipline issues despite

**EXHIBIT 7-4
CISD SAFETY AND SECURITY SURVEY RESPONSES
FEBRUARY 2011**

RESPONDENT	POOR	BELOW AVERAGE	AVERAGE	GOOD	EXCELLENT	NO RESPONSE
Your perception of the student's level of safety and security at school.						
Teachers	0.0%	6.3%	29.2%	43.8%	20.8%	0.0%
Parents	0.0%	2.2%	42.2%	44.4%	11.1%	0.0%
Students	9.8%	9.8%	42.1%	24.4%	7.3%	6.7%
The equity, consistency, and fairness of discipline students receive for misconduct.						
Teachers	16.7%	18.8%	35.4%	18.8%	10.4%	0.0%
Parents	13.3%	28.9%	33.3%	13.3%	4.4%	6.7%
Students	15.2%	14.5%	39.4%	20.0%	3.6%	7.3%

NOTE: Percentages may not add to 100 percent due to rounding.

SOURCE: Performance Review team survey results of respondents answering the survey, February 2011.

**EXHIBIT 7-5
DISTRICT AND CAMPUS IMPROVEMENT PLAN GOAL 3 EXCERPTS
2010–11**

GOAL 3 FOR ALL PLANS:

COTULLA ISD WILL PROVIDE A SAFE SCHOOL ENVIRONMENT THAT FOSTERS MUTUAL RESPECT OF ALL STAKEHOLDERS.

PLANS	GOAL 3 STRATEGIES	
	RELATED TO DISCIPLINE MANAGEMENT	SERVICES NOT PERFORMED
DIP 2010–11	Provide training on discipline management and conflict resolution.	Mini trainings have been provided, but no consistent program for addressing discipline management issues has been implemented.
Encinal Elementary CIP 2010–11	Provide bully prevention training for staff that have not been trained.	Bully prevention training has been provided, but the district does not have a process to address recurring discipline management issues with teachers.
Ramirez Burks Elementary CIP 2010–11	Provide bully prevention training for staff who have not been trained.	Bully prevention training has been provided, but the district does not have a process to address recurring discipline management issues with teachers.
Newman Middle School CIP 2010–11	Utilize the Mentoring Program to address positive behavior conflict resolution for school and home dilemmas.	This program is not recognized in CIPs for other schools. While customization for particular school needs is important, it highlights the lack of consistent approach for discipline management across all schools.
	Provide team building opportunities for all students via 7 Habits training and activities.	This program is not recognized in CIPs for other schools. While customization for particular school needs is important, it highlights the lack of consistent approach for discipline management across all schools.
Cotulla High School CIP 2010–11	Provide training on discipline management and conflict resolution.	Mini trainings have been provided, but no consistent program for addressing discipline management issues.
	Develop transition plan and contract for students returning from DAEP.	This program is not recognized in CIPs for other schools. While customization for particular school needs is important, it highlights the lack of consistent approach for discipline management across all schools.
	Include counseling for student and staff development (Texas Behavior Support Initiative) to deal with persistent discipline problems.	One of the two high school counselors was removed from the high school and transferred to the middle school, also with discipline management concerns.

SOURCE: 2010–11 CISD District and Campus Improvement Plans.

the fact that the district has a high and disproportionate rate of In School Suspension (ISS) placements relative both to all students and to non-special education students.

The district's student code of conduct defines appropriate student behavior providing numerous options that allows staff to select an appropriate consequence for different levels of misbehavior. Because discipline is a serious event for both the student and the school, teachers must document the incident and investigation leading to the discipline.

For serious offenses the district contracts with the Bigfoot Disciplinary Alternative Education Program (DAEP) in Bigfoot, approximately 60 miles from CISD. Students must ride two buses to reach Bigfoot. DAEP students board a bus in Cotulla that takes them to Dilley, a neighboring city approximately 16 miles to the north of the district. Students then board a bus in Dilley that takes them to Bigfoot. The decision to enter into a contract with Bigfoot DAEP was based on the determination that an inter-local agreement might be more cost effective than providing local alternative education services. School administrators also believe the lengthy ride is a deterrent to misconduct that rises to the DAEP level of consequences. In an interview with the DAEP principal at Bigfoot, he stated that the Cotulla board members were in deliberations regarding continuing their DAEP contract with the Bigfoot program. According to the superintendent, the district is currently exploring the option of opening their own DAEP program with two other districts. If that option does not work, the district may contract with Bigfoot without any penalty.

The district also has an ISS program designed to encourage personal responsibility and discourage repeat offenders. Students must complete a personal responsibility worksheet that asks them to provide solutions to the behavior problem. The ISS room is structured and quiet. Students work on assignments and have limited contact with other students. The physical activity period for high school ISS students are public service related, such as helping staff clean the school grounds.

CISD students may be suspended from school (out of School Suspension/OSS) for any misconduct listed in any category of the Student Code of Conduct . A student facing OSS may also be restricted by the district from school-sponsored or school-related activities, and may be suspended for a maximum of three school days per behavior violation.

Finally, the district hired a School Resource Officer in 2009 in part to address disciplinary issues resulting from a lack of

enforcement of school rules that rise to the level of criminal conduct such as disorderly conduct. CISD has taken a number of steps, such as the addition of the SRO, to control student misbehavior before it escalates into criminal conduct. The district is sensitive to the use of expulsion, as LaSalle County does not meet population requirements for a Juvenile Justice Alternative Education Program (JJAEP). In larger counties, the JJAEP is the educational alternative for students committing more serious or continuing conduct offenses. In CISD, a student who is expelled has no educational alternative.

Despite these efforts by the district concerning behavior and consequences, CISD had more than twice the rate of disciplinary placements than the region and the state, as shown in **Exhibit 7-6**. The disciplinary placements were high in three of the district's four schools. In 2008–09, more than 15 percent of Ramirez Burks Elementary students had disciplinary placements, at nearly five times its campus group percentage. Newman Middle School had the highest rate of disciplinary placements, at nearly 64 percent of its students had disciplinary placements, nearly three times the rate of its campus group. The rate of disciplinary placements at Cotulla High School was also high at 38.2 percent, exceeding its campus group by 13 percentage points.

CISD special education students also had a high rate of disciplinary placements (**Exhibit 7-7**). In fact, special education students were placed in the ISS or OSS at a higher rate than the entire CISD student population. The TEA 2010 Performance Based Monitoring Analysis System (PBMAS), using 2008–09 data, cited CISD (level 3) for its

EXHIBIT 7-6
STUDENTS WITH DISCIPLINARY PLACEMENTS
CISD, CISD SCHOOLS, REGION 20 AND STATE
2008–09

	NUMBER OF STUDENTS	PERCENT OF STUDENTS	PERCENT OF CAMPUS GROUP
Cotulla High School	135	38.2%	25.2%
Newman Middle School	150	63.6%	22.8%
Ramirez Burks Elementary	94	15.4%	3.3%
Encinal Elementary	0	0.0%	3.1%*
District	379	29.5%	
Region 20	55,624	13.6%	
State	657,011	13.4%	

*Part of a campus group of 40 other public schools.
SOURCE: Texas Education Agency, AEIS, 2009–10.

**EXHIBIT 7-7
SPECIAL EDUCATION INCLUDING
ALL STUDENTS WITH ISS AND OSS PLACEMENTS 2008–09**

DISCIPLINARY PLACEMENTS	SPECIAL EDUCATION STUDENTS	ALL STUDENTS	RATE DIFFERENCE	STATE RATE (PBMS STANDARD)
Number of students in district	119	1,286		
ISS Placements				
Placements to ISS	159	1,090		
Percent disciplinary placements to ISS	133.6%	84.8%		
Difference in rates between special education students and all students placement to ISS			48.8	
State rate difference (PBMS Standard)				10.0
OSS Placements				
Placements to OSS	64	302		
Percent disciplinary placements to OSS	53.8%	23.5%		
Difference in rates between special education students and all students placement to OSS			30.3	
State rate difference (PBMS Standard)				6.0

SOURCE: Texas Education Agency, 2010 Performance Based Monitoring Analysis System, Special Education.

disproportional ISS and OSS placements of special education students relative to its total student population.

The percentage of CISD students with disciplinary placements in 2009–10, although slightly lower than in 2008–09, was still high at 24.8 percent. The decrease from 2008–09 to 2009–10 was in OSS placements. Nearly one-quarter of CISD students had discipline issues in 2009–10 (**Exhibit 7-8**). Ninety percent of students with disciplinary placements were in school suspension and ten percent were placed in a DAEP. About 90 percent of the disciplinary placements were due to violation of the code of conduct and 9.5 percent were associated with truancy.

Further, special education students were subject to ISS placements more than twice as much as non-special education students and 1.7 times as much as all students as seen in **Exhibit 7-9**. Special education students were also disproportionately subject to OSS placements. Special education students were subject to OSS 3.8 times as much as non-special education students and 3.1 times as much as all students.

Students engaging in consistent misbehavior are usually those with socialization challenges. Removing those students from class further segregates them from social contact. While it is important to have consequences for misbehavior and that behaving students have a classroom environment

conducive to learning, disciplinary removal should be carefully reviewed when considered as a disciplinary sanction.

The Texas Behavior Support Initiative (TBSI), developed by TEA in 2001, in response to Senate Bill 1196, offers “a full continuum of positive behavioral intervention strategies and professionally accepted practices and standards for behavior management.” Although originally developed to address behavior issues associated with special needs students, it is applicable to all students and classroom situations. CISD has scheduled TBSI training for teams from all schools for June 2011.

Amarillo ISD has successfully implemented Positive Behavior Support districtwide to reduce behavior and referrals. The district trained all staff and is in its third year of implementation. The district has seen a significant decrease in campus referrals to ISS since the program started. Administrators and teachers credit the success of the program to the superintendent’s support and expectation that all staff embrace the system.

CISD should revise the DIP and CIPs Goal 3 strategies ensuring that sufficient strategies are included in the plans that focus on concrete tactics on how to deal with behavior problems tailored to the school’s disciplinary profile. The strategies should set targets for the reduction/elimination of specific behaviors and specify follow-through and monitoring.

**EXHIBIT 7-8
CISD ANNUAL DISCIPLINE SUMMARY
2009–10**

	NUMBER OF STUDENTS	PERCENT OF STUDENTS
Cumulative year-end enrollment	1,298	100.0%
District discipline population	322	24.8%
Students removed to a DAEP	33	2.5%
Students suspended in school	290	22.3%
Students suspended out of school	33	2.5%
Disciplinary Placements	(N=983)	
Number of disciplinary placements	983	100.0%
Number of DAEP placements	45	4.6%
Number of out of school suspensions	53	5.4%
Reasons*	(N=767)	
Violated local code of conduct	689	89.8%
Fighting/mutual combat	5	0.7%
Truancy – parent contributed to	13	1.7%
Truancy – 3 unexcused absences	29	3.8%
Truancy – 10 unexcused absences	31	4.0%
Discipline Action**	(N=981)	
Out of school suspension	33	3.4%
In school suspension	525	53.5%
DAEP placement	44	4.5%
Truancy charges filed with fine	77	7.8%
Part-day out of school suspension	20	2.0%
Part day in school suspension	282	28.7%

*The frequency distribution of reasons does not add up to the number of disciplinary placements.

**The number of discipline actions is not consistent with the number of disciplinary placements.

SOURCE: CISD Annual Disciplinary Summary, PEIMS Discipline Data for 2009–10.

**EXHIBIT 7-9
ALL STUDENTS, SPECIAL EDUCATION AND NON-SPECIAL EDUCATION STUDENTS WITH ISS AND OSS PLACEMENTS 2009–10**

DISCIPLINARY PLACEMENTS	SPECIAL EDUCATION STUDENTS	NON-SPECIAL EDUCATION STUDENTS	ALL STUDENTS	RATE DIFFERENCE (ALL SPECIAL EDUCATION STUDENTS)
Number of students in district	93*	1,205	1,298	
Placements to ISS	117	690	983	
Percent disciplinary placements to ISS	125.8%	57.3%	75.7%	
Rate of difference between special education students and all students placement to ISS				50.3
Placements to OSS	12	41	53	
Percent disciplinary placements to OSS	12.9%	3.4%	4.1%	
Rate of difference between special education students and all students placement to OSS				8.8

*Texas Education Agency, AEIS Report, 2009–10.

SOURCE: CISD Annual Disciplinary Summary, PEIMS Discipline Data for 2009–10.

Finally, the district should invest in additional staff development to address behavior management and/or invest in a districtwide program proven to be effective. CISD should contact districts like Amarillo ISD and engage in a dialogue regarding the pros and cons of programs like Positive Behavior Support or as it is referred to nationally Positive Behavior Interventions and Supports (PBIS). PBIS is described by the journal of Positive Behavior Interventions (2003) as a systems approach for establishing a continuum of proactive positive discipline procedures for all students, all staff members, and all settings.

This recommendation can be implemented with existing resources.

ACCOUNTABILITY IN ATTENDANCE POLICIES (REC. 45)

The district's attendance process does not hold parents and students accountable for student absenteeism and there is minimal communication between CISD and the district court, which has jurisdiction over family law cases. The district has the basic components of a truancy reduction program, including the filing of misdemeanor charges against truant students. However, these efforts have not materially improved the district's attendance.

Texas has compulsory school attendance with state regulations on when and how attendance data is collected. At second period each day, CISD teachers take attendance and report absences.

CISD's centralized approach to attendance places a central administrator, the Director of Student Services, with responsibility for safety issues for the district, including truancy. The director visits the campuses, views reports, and decides whether or not to file charges. Prior to filing charges, parents have opportunities to conference about their child's attendance. If charges are filed, the paperwork is prepared by central administration.

In addition, the Director of Student Services supervises the district SRO, who is also the truant officer. At the beginning of each school year, parents and students are given information on the district's attendance policy through the student handbook. Parents are required to sign an attendance warning letter before September 1st of each school year. Although the student handbook states this is the only warning letter regarding attendance that will be given, a second warning letter is provided to parents after the third unexcused absence. A parent signature is also required as proof the additional warning was received.

The SRO is then provided with student names for follow up. Timely reporting of absent students increases the potential for locating and returning the student, although not all teachers turn in the attendance report timely.

Lastly, district Parent Involvement Aides at each campus serve as a liaison between the district, students, and parents. As part of their many tasks, aides call parents when students are absent and coordinate the appropriate documentation necessary when students must present proof for excused or excessive absences.

CISD's attendance is slightly lower than the state and region average, as shown in **Exhibit 7-10**.

EXHIBIT 7-10
CISD PERCENT AVERAGE ATTENDANCE RATE
2006-07 TO 2008-09

	2006-07	2007-08	2008-09	INCREASE
Cotulla ISD	94.2%	94.4%	94.4%	0.2
Region 20	94.9%	95.0%	95.2%	0.3
State	95.5%	95.5%	95.6%	0.1

SOURCE: Texas Education Agency, Academic Excellence Indicator System (AEIS), 2006-07 to 2008-09.

Although CISD has increased its attendance average over a three-year period, student absenteeism is not consistently distributed across district schools. **Exhibit 7-11** compares the average attendance by grade in the district.

Attendance is critical to learning and to the infrastructure that supports learning. State funding is calculated on the number of students in average daily attendance (ADA). Each absence affects state funds received to provide for classrooms, computers, cafeterias, arts, athletics, and other necessary operations.

As seen in **Exhibit 7-11**, CISD's primary attendance shortfall is at the high school level. In its DIP, a state required long-range plan for school districts, CISD identified attendance as an area of concern. To reach the district goal of continuing to close the achievement gap between special populations and other students, CISD adopted a strategy of enforcing their attendance policy by way of the SRO and Parent Involvement Aides. The DIP assigns responsibility for this activity to school principals, the Public Education Information Management System (PEIMS) clerk, and the district's truant officer. The truant officer is not only responsible for responding to criminal activity on the campuses, but also issuing truancy tickets.

EXHIBIT 7-11
CISD PERCENT ATTENDANCE BY GRADE
2007–08 TO 2009–10

GRADE	PERCENTAGE DAILY ATTENDANCE		
	2007–08	2008–09	2009–10
Kindergarten	94.4%	94.5%	95.0%
First	94.9%	95.7%	95.5%
Second	95.0%	95.8%	96.8%
Third	95.1%	96.2%	96.6%
Fourth	95.5%	95.4%	96.0%
Fifth	95.9%	95.7%	95.7%
Sixth	95.8%	95.2%	96.0%
Seventh	95.9%	94.1%	95.6%
Eighth	95.1%	94.6%	94.5%
Ninth	91.5%	92.5%	93.4%
Tenth	91.1%	92.0%	93.8%
Eleventh	92.4%	92.7%	91.5%
Twelfth	92.6%	92.0%	89.2%

SOURCE: Cotulla ISD, Truancy Report, 2007–08 to 2009–10.

The average daily attendance figure in **Exhibit 7-12** is the result of a state formula calculation of the average number of students in attendance in a district each day, and is used in various funding formulas. There are different measures of attendance, such as the average annual attendance for a school or district shown in **Exhibit 7-10** or the percentage of students in daily attendance in **Exhibit 7-11**. Each measure provides additional data points for schools to use in identifying problems and developing solutions.

Exhibit 7-12 shows the average daily attendance factor used for calculating state funding.

District ADA decreased 1.15 percent between 2006–07 and 2009–10, but will have an increase of 0.74 percent over the

EXHIBIT 7-12
CISD AVERAGE DAILY ATTENDANCE
2006–07 TO 2010–11

YEAR	ADA*
2006–07	1,087
2007–08	1,095
2008–09	1,092
2009–10	1,074
2010–11 estimated	1,095

*Some numbers have been rounded for readability.

SOURCE: Texas Education Agency, School Finance Average Daily Attendance Reports, 2006–2011.

five-year period if the 2010–11 estimate is accurate. Although CISD attendance varies by only tenths of a point, as shown in **Exhibit 7-12**, small changes in attendance affect district funding. In smaller student populations, a handful of students can affect the average.

To help bolster student attendance, the district rewards good attendance in a variety of ways. For example, since the district has a uniform dress code, perfect attendance can earn students a dress code free day, or admittance to extracurricular activities such as school sponsored dances. The district also asks teachers to model good attendance habits for their students. Students with absences meeting statutory definitions for criminal misconduct are, however, issued truancy tickets, and have to answer for their conduct in Justice of the Peace court.

Truancy is a Class C misdemeanor. Receiving a truancy ticket is similar to receiving a traffic ticket. When students reach the statutory number of unexcused absences, CISD files misdemeanor truancy charges. A student can receive the Class C misdemeanor ticket for excessive absenteeism, as can a parent who does not make an effort to get his or her child to school. Truancy related charges are filed in the Justice of the Peace court. **Exhibit 7-13** shows the number of cases filed against high school students and the case disposition.

During the review team's onsite work in February 2011, the school year appeared to be on track with 2009–10, having 24 high school cases filed and disposed by fine at the mid-year mark.

In an interview with the review team, the SRO stated that parents do not always understand their duty to get their child to school when the child does not want to go. Staff also said that sometimes parents keep a child at home if their child does not have necessities such as appropriate clothing. The

EXHIBIT 7-13
CISD HIGH SCHOOL TRUANCY CASES
2006–07 TO 2009–10

YEAR	CASES FILED WITH NO FINE	CASES FILED WITH A FINE
2006–07	*	0
2007–08	0	0
2008–09	42	60
2009–10	18	52

*Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34 CFR Part 99 and Texas Education Agency procedures OP 10-03.

SOURCE: CISD Discipline Action Listing, 2011.

administrator indicated the district does not file charges against parents if the parent tells the school they cannot make their child attend.

District staff also expressed frustration over the lack of meaningful consequences for persistent truancy. At the local Justice of the Peace level, students can clear their criminal charges by attending class. Some students use the opportunity to restart their education, but many continue to reoffend. In 2009–10, CISD reported 31 citations for 10 or more absences. However, the district has had difficulty getting the district court with family law jurisdiction interested in treating persistent truancy as the more serious, “child in need of supervision” charge. Communication between CISD and family court, even on district students serving probation, is minimal.

There are many model programs for impressing upon students the value of attendance and the consequences of absenteeism and providing solutions to problems that interfere with education. Galena Park ISD connects students with social services so poverty does not become a roadblock to education. The Harris County District Attorney sends attendance warning letters under office letterhead to impress upon families the seriousness of the offense. In Port Arthur, Texas a justice of the peace collaborated with a local junior college to produce a training program that shows truants that finishing their education is possible, and how to accomplish it.

CISD should create a more comprehensive process for truancy reduction, and develop agreements with local officials for assistance in enforcing compulsory attendance law. The district should expect parents who say they cannot make a child attend school to participate fully in district efforts to hold the child accountable. The district should decide what activities are expected of the parent as a good faith effort.

CISD should request that courts also use all available tools where appropriate. The district should ask the court to consider the importance of truancy sanctions and consider assessing stronger penalties against parents and students who are not making an effort to correct behavior. For example, truants under the age of 17 who violate Justice Court orders to attend school could have their driver’s license suspended, or be denied issuance if they do not have a license, until they are no longer in contempt of the court’s order. The Justice Court can also refer juvenile students in contempt of Justice Court orders to Juvenile Court.

CISD should also contact local officials for development of programs that engage the community in truancy reduction efforts. Where social services may address an attendance problem, school counselors should be enlisted to identify appropriate agencies and connect the family to providers. The district should also develop better lines of communication with the local juvenile probation officer by exploring an interagency agreement to share information under Texas Family Code 58.0051.

Truancy results in a loss of state funding which affects all students, including the truant. Increasing attendance in CISD from 94.4 percent to the state average of 95.6 percent or 1.2 percent based on the latest posted AEIS information for 2008–09 would result in an increase in state revenue of \$517,471 by fiscal year 2015–16 as seen in **Exhibit 7-14**. The district attendance rate would gradually increase from 2011–12 to 2013–14 until reaching the state average of 95.6 percent attendance rate.

This recommendation would impact the state treasury.

EXHIBIT 7-14
CISD PROJECTED ATTENDANCE RATE INCREASE
2009–10 TO 2015–16

FISCAL YEAR	ADA PROJECTIONS	PERCENT ATTENDANCE RATE GOAL	COMPUTED ENROLLMENT AT 94.4%	REVISED ADA	MARGINAL INCREASE	CONVERT TO WADA	\$6,035 TOTAL M&O PER WADA
2009	1,091.5	94.4%	1,156.3				
2010	1,074.2	94.4%	1,137.9				
2011	1,062.1	94.4%	1,125.1				
2012	1,050.2	94.8%	1,112.5	1,054.7	4.4	7.3	\$44,312
2013	1,038.4	95.2%	1,100.0	1,047.2	8.8	14.5	\$87,628
2014	1,026.7	95.6%	1,087.6	1,039.8	13.1	21.5	\$129,965
2015	1,015.2	95.6%	1,075.4	1,028.1	12.9	21.3	\$128,505
2016	1,003.8	95.6%	1,063.3	1,016.5	12.8	21.1	\$127,061

NOTE: Projections are TEA's pupil projections, extended out to FY2016. 1.65 WADA-to-ADA ratio and \$6,035 total M&O per WADA are figures for Cotulla ISD from LBB current law model.

SOURCE: Legislative Budget Board (LBB) current law model.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
43. Develop and implement a safety planning process with oversight authority to a single coordinating position and integrate the process with spending priorities.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
44. Revise behavior management strategies in the district and campus improvement plans that are tailored to the schools' disciplinary profile and ensure all teachers receive training in positive behavior intervention and discipline management.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
45. Create a more comprehensive process for truancy reduction, and agreements with local officials for assistance in enforcing compulsory attendance law.	\$44,312	\$87,628	\$129,965	\$128,505	\$127,061	\$517,471	\$0
TOTALS	\$44,312	\$87,628	\$129,965	\$128,505	\$127,061	\$517,471	\$0

CHAPTER 8

FOOD SERVICE

COTULLA INDEPENDENT SCHOOL DISTRICT

CHAPTER 8. FOOD SERVICE

Cotulla ISD (CISD) participates in the National School Lunch Program (NSLP); the School Breakfast Program (SBP); the Afterschool Snack Program; and the Summer Feeding Program. These Child Nutrition Programs (CNP) are funded by federal reimbursement for free, reduced-price, and full-price meals; state matching funds; and local revenues from the sale of meals and a la carte foods. If these revenues fail to cover the cost of providing meals, the district's operating fund must subsidize the CNP.

Many factors contribute to whether or not the district's CNP operate at a break-even point, a profit, or at a loss. Examples of such factors include, but are not limited to: enrollment; percentages of students approved for free and reduced-price versus full-price meal benefits; meal prices set by the district; bus schedules; and time allotted for breakfast and lunch services. School administration, teacher, parent, and community support for the CNP is another important influence over the success of the programs.

The most critical factor in managing the CNP fund balance is the Food Service Director's ability to plan a budget that will work for the department; secure current and accurate information regarding expenditures and revenue; and maintain compliance with the budget, or amend it as necessary. This review examines the above mentioned factors as well as others that influence the capacity of the CISD Food Service Department to meet the goal of providing healthy meals to the students of CISD while remaining fiscally sound.

Each of the four schools comprising CISD has an on-site kitchen. The high school and the two elementary schools have on-site preparation. Food for the middle school is prepared at the high school and transported where it is heated and portioned. The Ramirez Burks Elementary School caters meals to the Early Childhood Center. This includes the preparation, service, and clean up of the food service area in this facility.

In addition to reimbursable meals, CISD sells a la carte offerings at breakfast and lunch. All a la carte foods are carefully selected based on their nutrient content. The Food Services Department does no sales through vending machines; however, there is a vending machine in the high school cafeteria that competes with the Food Services

Department in the sale of water. The profits from this machine support the high school, not the Food Service Department.

The CISD Food Services Department has 12 employees. There are two employees (a manager and one other employee) at Cotulla High School, Newman Middle School, and Encinal Elementary School. At Ramirez Burks Elementary School, there are five food service workers, the manager and four other employees. The functions of the department are managed by the director who reports to the Finance Director, and superintendent. The Food Service Director also cashiers at Newman Middle School.

ACCOMPLISHMENT

- Students helped select individual themes and decorations for each school cafeteria.

FINDINGS

- CISD has not developed targeted standards for food, labor, and non-food expenditures as a percentage of revenue, or developed a system for routinely monitoring those expenditures to ensure that the Child Nutrition Program (CNP) fund remains within budgeted amounts and is fiscally sound.
- The price the district charges for catered meals is not sufficient to cover the cost of producing and serving the meals.
- The student breakfast and lunch prices and the adult breakfast prices do not cover the cost of producing and serving the meals.
- The Food Service Department has not developed and does not use a district staffing formula.
- The district does not provide food service employees incentives to perform well and provides few opportunities for professional growth.
- The district uses an excessive and unnecessary amount of disposable service ware in the operation of the CNP.
- The percentage of revenue the district spends on food is excessive.

- The CISD Food Service Department has not set targeted goals for average daily participation (ADP) by school, and no marketing strategies are employed to increase participation in the NSLP and SBP.
- CISD does not offer universal breakfast at any of the campuses.

RECOMMENDATIONS

- **Recommendation 46: Develop targeted standards for expenditures by category (food, labor, and non-food) as a percentage of revenue.**
- **Recommendation 47: Increase the prices being charged to cater meals to the Early Childhood Center so that they are equal to the federal reimbursement rate including the value of USDA donated foods for a free meal.**
- **Recommendation 48: Increase the prices of student full-price breakfasts and lunches and the adult price for breakfast to equal the reimbursement for a free student meal.**
- **Recommendation 49: Develop written daily work schedules and menu-specific instructions to eliminate crisis periods in the production and service of the meals.**
- **Recommendation 50: Institute methods for recognizing employee performance and providing for professional growth.**
- **Recommendation 51: Reduce the use of disposable service ware.**
- **Recommendation 52: Reduce the cost of food by planning portion sizes by grade level.**
- **Recommendation 53: Increase participation in the NSLP and SBP by marketing the programs.**
- **Recommendation 54: Consider piloting a universal breakfast program.**

DETAILED ACCOMPLISHMENT

CAFETERIA DECOR

Students helped select individual themes and decorations for each school cafeteria. Decorations were professionally coordinated and the dining rooms have the feel of a commercial restaurant. Kitchen facilities in each of the schools have been updated. Participation in the breakfast and

lunch programs has increased over the past two years. The director indicated that more students are eating in the cafeterias because the cafeterias are so inviting.

DETAILED FINDINGS

FINANCIAL MANAGEMENT (REC. 46)

CISD has not developed targeted standards for food, labor, and non-food expenditures as a percentage of revenue, or developed a system for routinely monitoring those expenditures to ensure that the Child Nutrition Program (CNP) fund remains within budgeted amounts and is fiscally sound. CISD was unable to provide accurate end-of-year financial information representing the food, labor, and non-food expenditures; and total revenue for the CNP for the 2006–07, 2007–08, 2008–09, 2009–10 school years. The Food Service Director does not receive accurate monthly revenue and expense reports.

According to the Food Service Director, although she has received expenditure reports from the Finance Department in prior years, the information in these reports was not current and could not be used to develop profit and loss statements for individual schools. It is not possible to effectively manage CNP when the information available from the Finance Department is not up-to-date and accurate. Other than keeping a set of books in the food service office, which wastes valuable time that could be used in more productive ways, the director must depend on the Finance Department to support maintaining control over program costs. The director stated that even when she believes that programs are on track financially, at the end of the year, a district charge such as utilities may appear which changes the CNP fund balance significantly, and results in an unanticipated negative fund balance.

The Finance Director is new to the position as of November 2010. During the review team interview with the Finance Director and the Food Service Director, the information being provided was the work of prior Finance Directors. On the day of the on-site interview, the Finance Director orally presented some information on total revenue and expenditure costs of the Food Service Department for the last four school years. However, the data provided was not complete and contradicted itself. For example, the Finance Director indicated that the Food Service Department had turned a profit in school year 2009–10. Yet, it was also reported that the district transferred over \$100,000 from the CISD operating fund to the Food Service Department during this same year indicating that the Food Service Department was

actually operating at a loss. This information was not deemed accurate by participants of the meeting, including the Finance Director.

The Food Service Director was able to provide a print out of a spreadsheet that detailed revenues and expenditures for the all four schools in the district over the past three school years. It should be noted that total revenue for the 2009–10 school year on this printout did not match the revenue presented orally earlier in the interview. The meeting concluded with the Finance Director stating that the data would be reviewed more closely and provide an updated version of the requested information at a later time. This information was never made available during the course of the review, and later repeated calls and e-mails to the district yielded no information other than one report for the 2006–07 school year by e-mail on February 22, 2011.

Exhibit 8-1 provides information for analyzing school district expenditures as a percentage of revenue. If revenue were also available by school it would be more useful in identifying which schools may be over spending and in which categories. The non-food costs at Cotulla High School and Ramirez Burks Elementary School during the 2009–10 and 2008–09 school years appear very high. The district should examine these costs further to ensure their accuracy and/or determine the exact nature of these costs.

Using the total revenue and expenditures for the 2009–10 school year in **Exhibit 8-1**, it can be determined that 38.12 percent of the total revenue in all four schools is being spent on food; 19.39 percent of the total revenue is being spent on non-food items; and 29.69 percent of the total revenue is being spent on labor; for a total of 87.2 percent of the revenue being spent directly by the schools. The remaining difference comes from the non-school assigned expenditures. During the course of the review, neither the Food Service Director nor the CISD Finance Department was able to provide any explanation as to exactly what these costs entailed.

Exhibit 8-2 isolates food expenditures, as provided in **Exhibit 8-1**, for the purpose of comparison and analysis.

The industry standard for food cost as a percentage of revenue is 40 to 45 percent, if USDA donated foods are included. The individual schools are in line with that standard each year; however, once the food costs that are not assigned to specific schools are added, the annual percentages increases from between 10.6 percent to 17.12 percent. In that catered meals sent to the Early Childhood Center and Head Start (in

prior years) were provided through a particular school, those food costs would be attributed to the sending schools.

The district should investigate the source of the \$110,852.29 food expenditures for school year 2009–10 that is in addition to the foods used for reimbursable meals and a la carte foods served in schools. If this expense is for commodity delivery and/or processing, the value of these services should be reevaluated. The total food cost as a percentage of revenue is excessive all three years.

Exhibit 8-3 isolates non-food expenditures, as provided in **Exhibit 8-1**, for the purpose of comparison and analysis.

The industry standard for non-food cost as a percentage of revenue is 8 to 12 percent. Expenditures in the non-food category for the Cotulla High School and Ramirez Burks Elementary during the 2009–10 and 2008–09 school years should be investigated. These costs are the reason the school non-food costs are out of line with the industry standards.

The non-food cost not attributed to a particular school might be USDA donated foods (however, in 2007–08 it is a positive, not negative number) and, if this is true, it should be recorded in food cost. The schools non-food cost increased by \$81,408.04 and the non-food cost not attributed to a particular school decreased by \$82,901.55 from 2007–08 to 2008–09. The district should investigate what these entries represent.

Exhibit 8-4 isolates labor expenditures as provided in **Exhibit 8-1**, for the purpose of comparison and analysis.

The industry standard for labor cost as a percentage of revenue is from 40 to 45 percent. The current Food Service Director has done an excellent job of reducing labor through attrition over the three years represented in **Exhibit 8-4**. It would be a reasonable assumption that the labor costs not attributed to a particular school are the salary and benefits for the central Food Service staff and expenses. However, the Food Service Director indicated that food service employees have not received any raises or bonuses in the last three school years. Thus, the district should investigate why that category increased by \$14,797.76 in three years. The 2009–10 total labor cost as a percentage of revenue is in line with industry standards.

Utility costs in excess of the budgeted amounts were transferred out of the CNP funds into the district general operating fund. During the 2009–10 school years, \$31,000 was budgeted for utilities and \$69,861.91 was charged, an excess of \$38,861.91. According to the Food Service Director

**EXHIBIT 8-1
EXPENDITURES BY SCHOOL
SCHOOL YEARS 2007–08 TO 2009–10**

SCHOOL	REVENUE	FOOD	NON FOOD	LABOR	TOTAL EXPENDITURES	DIFFERENCE
School Year 2009–10						
Cotulla High School		\$58,702.00	\$56,033.82	\$65,398.66	\$180,134.48	
Newman Middle School		\$48,547.74	\$5,910.87	\$18,833.38	\$73,291.99	
Ramirez Burks Elementary School		\$105,630.71	\$60,168.29	\$74,649.77	\$240,448.77	
Encinal Elementary School		\$33,881.34	\$3,427.34	\$33,333.59	\$70,642.27	
Non-School Assigned Expenditures		\$110,852.29	(\$45,147.62)	\$75,352.30	\$141,056.97	
Total Expenditures		\$357,614.08	\$80,392.70	\$267,567.70		
	\$647,377.03				\$705,574.48	(\$58,197.45)
School Year 2008–09						
Cotulla High School		\$72,849.91	\$40,698.60	\$84,001.61	\$197,550.12	
Newman Middle School		\$45,526.09	\$5,004.54	\$18,027.36	\$68,557.99	
Ramirez Burks Elementary School		\$114,141.18	\$80,723.79	\$76,755.53	\$271,620.50	
Encinal Elementary School		\$24,664.33	\$2,419.52	\$33,764.01	\$60,847.86	
Non-School Assigned Expenditures		\$75,233.97	(\$32,167.67)	\$62,746.24	\$105,812.54	
Total Expenditures		\$332,415.48	\$96,678.78	\$275,294.75		
	\$607,739.65				\$704,389.01	(\$96,649.36)
School Year 2007–08						
Cotulla High School		\$65,020.48	\$4,079.45	\$82,396.88	\$151,46.91	
Newman Middle School		\$54,273.21	\$5,104.50	\$32,261.72	\$91,639.52	
Ramirez Burks Elementary School		\$116,064.61	\$9,312.93	\$81,548.40	\$206,926.12	
Encinal Elementary School		\$23,767.84	\$1,157.30	\$29,374.58	\$54,299.76	
Non-School Assigned Expenditures		\$66,586.58	\$78,518.11	\$60,554.54	\$205,658.82	
Total Expenditures		\$325,712.72	\$98,172.29	\$286,136.12		
	\$631,121.29				\$710,021.13	(\$78,899.84)

SOURCE: Information provided electronically by the Finance Director during the interview with the Food Service Director and the Finance Director, February 9, 2011.

**EXHIBIT 8-2
FOOD COSTS BY SCHOOL VERSUS TOTAL FOOD COSTS,
AS A PERCENTAGE OF REVENUE**

SCHOOL YEAR	TOTAL REVENUE	SCHOOLS FOOD EXPENDITURES		ADDED NON-SCHOOL SPECIFIC FOOD EXPENDITURES		
		SCHOOL FOOD COST	SCHOOL FOOD COST AS A PERCENTAGE OF REVENUE	FOOD COST NOT ATTRIBUTED TO A PARTICULAR SCHOOL	TOTAL FOOD COST	TOTAL FOOD COST AS A PERCENTAGE OF REVENUE
2009–10	\$647,377.03	\$246,761.79	38.12%	\$110,852.29	\$357,614.08	55.24%
2008–09	\$607,739.65	\$257,181.51	42.32%	\$75,233.97	\$332,415.48	54.70%
2007–08	\$631,121.29	\$259,126.14	41.06%	\$66,586.58	\$325,712.72	51.61%

SOURCE: Created by the review team using district information provided in Exhibit 8-1.

**EXHIBIT 8-3
NON-FOOD COSTS BY SCHOOL VERSUS TOTAL FOOD COSTS AS A PERCENTAGE OF REVENUE**

SCHOOL YEAR	TOTAL REVENUE	SCHOOL'S NON-FOOD EXPENDITURES		ADDED NON-SCHOOL SPECIFIC NON-FOOD EXPENDITURES		
		SCHOOL'S NON-FOOD COST	SCHOOL NON-FOOD COST AS A PERCENTAGE OF REVENUE	NON-FOOD COST NOT ATTRIBUTED TO A PARTICULAR SCHOOL	TOTAL NON-FOOD COST	TOTAL NON-FOOD COST AS A PERCENTAGE OF REVENUE
2009–10	\$647,377.03	\$125,540.32	19.39%	(\$45,147.62)	\$80,392.70	12.42%
2008–09	\$607,739.65	\$128,846.45	21.20%	(\$32,167.67)	\$96,678.78	15.91%
2007–08	\$631,121.29	\$47,438.41	7.52%	\$50,733.88	\$98,172.29	15.56%

SOURCE: Created by the review team using district information provided in Exhibit 8-1.

**EXHIBIT 8-4
LABOR COST BY SCHOOL VERSUS TOTAL FOOD COSTS AS A PERCENTAGE OF REVENUE**

SCHOOL YEAR	TOTAL REVENUE	SCHOOLS LABOR EXPENDITURES		ADDED NON-SCHOOL SPECIFIC LABOR EXPENDITURES		
		SCHOOLS LABOR COST	SCHOOL LABOR COST AS A PERCENTAGE OF REVENUE	LABOR COST NOT ATTRIBUTED TO A PARTICULAR SCHOOL	TOTAL LABOR COST	TOTAL LABOR COST AS A PERCENTAGE OF REVENUE
2009–10	\$647,377.03	\$192,215.40	29.69%	\$75,352.30	\$267,567.70	41.33%
2008–09	\$607,739.65	\$212,548.51	34.97%	\$62,746.24	\$275,294.75	45.30%
2007–08	\$631,121.29	\$225,581.58	35.74%	\$60,554.54	\$286,136.12	45.34%

SOURCE: Created by the review team using district information provided in Exhibit 8-1.

this action was taken late in the year, without notification. It is possible cutbacks could have been made in some other area of program operations had this been communicated in advance; however, at the late date that the problem was discovered, there was nothing that could be done to remedy the situation.

No explanation could be offered regarding the basis for the formula used to determine the Food Service Department's share of the utilities. The Food Service Department does not have separate utility meters. The charges were not proportionately distributed among the schools; therefore, this action invalidated any meaningful end of the year analysis of costs by school.

The district should develop targeted standards for expenditures by category (food, labor, and non-food) as a percentage of revenue and diligently monitor compliance with those standards. In addition, the Finance Department should provide the Food Service Director with an accurate monthly revenue and expenditures report itemized for each individual school. The Food Service Director has the skills and knowledge necessary to make hard decisions, as was demonstrated in the reduction of staffing. However, it is not possible to make fact-based decisions and do an effective job of managing the programs to ensure a positive CNP fund

balance if current and accurate information regarding revenue and expenditures is unavailable.

CISD should encourage the Finance Director and the Food Service Director to cooperatively monitor the revenue and expenditures of the CNP funds, otherwise the district risks losing the opportunity to take immediate corrective action when deficit spending is identified. When revenue and expenditures by category (food, labor, and non-food), by school, are not routinely and diligently monitored against projected revenue and expenditures as reflected in the budget; underproducing and overspending may be identified too late to take corrective action. Due to the low profit margins and the dynamic nature of Food Service Operations, a program can quickly move from profitable to deficit spending.

Best practices dictate that planning, monitoring, and adjusting the budget as necessary is the key to operating the Food Service Department at a breakeven point or profit. The budget must be an accurate projection of revenue and expenditures and strictly adhered to, or amended as needed with full knowledge of the director.

This recommendation can be implemented with existing resources.

EARLY CHILDHOOD CENTER (REC. 47)

The price the district charges for catered meals is not sufficient to cover the cost of producing and serving the meals. The CISD Food Service Department caters meals to the Cotulla Early Childhood Center where there are 17 students. The price the Food Services Department receives from the center for each lunch is \$2.34. This is less than the reimbursement amount for a free meal which is \$3, including the value of USDA donated foods. Thus, the Early Childhood Center is retaining \$0.66, per free meal served. According to the Food Service Director, the administrator of the Early Childhood Center stated that they must pay a lower than free reimbursement price to CISD in that not all of the students are free, and they only receive \$2.34 for reduced-price, and \$0.26 for full-price meals reimbursement.

The federal reimbursement for reduced-price and full-price meals is designed to supplement, not cover the cost of the meal as it does with free meals. Parents who do not qualify for free meals pay either \$0.40 for a reduced-price lunch or the full-price established by the school. There are schools that provide free meals to all students regardless of their family income, but those schools must supplement the programs from the general operating funds. As a result, the CISD Food Services Department should not be asked to supplement those students at the Cotulla Early Childhood Center who are not eligible for a free lunch.

CISD provides 17 lunches per day to the Early Childhood Center; $17 \times \$2.34 = \39.78 daily. The labor to prepare, transport, serve and clean-up is estimated at three hours \times \$8 per hour = \$24 daily labor cost. The industry standard for food cost is 40 to 45 percent of revenue; $\$39.78 \times 0.40 = \15.91 daily food cost. Typically non-food costs are approximately 10 percent of revenue; $\$39.78 \times 0.10 = \3.98 daily non-food cost. The estimated total cost of providing the meal each day is \$2.58 per meal or \$43.89; a \$4.11 daily, or \$739.80 annual loss to the CISD CNP.

The Food Service Department should increase the prices being charged to cater meals to the Early Childhood Center so that they are equal to the federal reimbursement rate including the value of USDA donated food for a free meal. If the price of the meals is raised to the \$3 reimbursement rate for free meals, revenue will increase to $17 \times \$3 = \51 per day, \$9,180 annually ($180 \times \51). This price change would yield a \$1,279.80 annual profit for the CISD Food Service Department rather than a \$739.80 loss. If the district reaches a yield of \$1,279.80 annual profit, this will result in a \$2,020 annual increase in CNP fund balance.

STUDENT AND ADULT MEAL PRICING (REC. 48)

The student full-price breakfast and lunch prices and the adult breakfast price do not cover the cost of producing and serving the meals. The prices of paid student meals and the adult breakfast are less than the federal reimbursement for a free meal. **Exhibit 8-5** identifies 2010–11 student and adult meal prices for school districts in the surrounding area. Of the nine districts surveyed, CISD is one of only two that does not provide a universal breakfast for all students. Two districts provide free lunches to all students, and two districts have lower student lunch prices than CISD.

Exhibit 8-6 shows that the adult lunch price equals the revenue generated by a free student lunch. The adult breakfast price is \$0.26 less than the revenue generated by a student free breakfast. Districts must ensure, to the extent practicable, that the federal reimbursements, children's payments and other non-designated nonprofit child nutrition revenues do not subsidize program meals served to adults. Breakfasts and lunches served to adults must be priced so that the adult payment in combination with any other revenues (i.e., school subsidizing as a fringe benefit) is sufficient to cover the overall cost of the meal, including the value of any USDA entitlement and bonus commodities used to prepare the meal. According to the Finance Director and the audited financial statements, CISD supplements CNP revenue from local operating funds. The value of these funds subsidizes the CNP sufficiently to cover the difference; however, the programs are operating at a deficit.

The Food Service Department should raise student full-price breakfast and lunch prices; and the adult price for breakfast to ensure that the revenue generated by meals in these categories is sufficient to cover the cost of preparing and serving the meals. In order for CISD full-price student meal prices to equal the reimbursement for a free meal, the student breakfast price would need to be raised to \$1.50; the student lunch price to \$2.46; and the adult breakfast to \$1.76.

Previous school reviews conducted in other districts have shown that an increase in lunch prices may be more palatable to the community if a universal breakfast program is implemented. Under a universal breakfast program, students receiving full-price meal benefits would receive a free daily breakfast and pay \$2.46 for lunch. The district should review the meal prices annually after USDA releases the reimbursement rates. This would allow the district to adjust their costs accordingly and avoid having to make large price increases that are generally much more difficult to present to parents than smaller ones.

**EXHIBIT 8-5
COMPARISON OF SCHOOL MEAL PRICES IN COTULLA AND SURROUNDING DISTRICTS
SCHOOL YEAR 2010–11**

MEAL PRICING SCHOOL DISTRICT	BREAKFAST			LUNCH		
	ELEMENTARY	SECONDARY	ADULT	ELEMENTARY	SECONDARY	ADULT
Cotulla ISD	\$0.60	\$0.60	\$1.50	\$1.00	\$1.50	\$3.00
Carrizo Springs ISD	Free	Free	\$1.80	Free	Free	\$3.00 \$3.25 Visitor
Crystal City ISD	Free	Free	\$3.00	Free	Free	\$3.00
Devine ISD	Free	Free	No Adult Breakfasts	\$2.00	\$2.25	\$4.00
Freer ISD	Free	Free	\$1.50	\$1.00	\$0.00	\$3.00
Lytle ISD	Free	Free	\$1.50 \$1.75 Visitor	\$1.75	\$2.00	\$3.00 \$3.25 Visitor
Natalia ISD	Free	Free	\$1.75	\$1.50	\$1.75	\$3.00
Pearsall ISD	\$0.40	0.40	0.75	\$1.00	\$1.00	\$2.75
Somerset ISD	Free	Free	\$2.00	\$1.50	\$2.00	\$3.50

SOURCE: Telephone communication with the represented districts on February 14, 2011.

**EXHIBIT 8-6
ADULT MEAL AND STUDENT FULL-PRICE MEAL REVENUE COMPARED TO REVENUE GENERATED BY A FREE MEAL**

BREAKFAST						
CATEGORY OF MEAL BENEFITS	PRICE PAID	REIMBURSEMENT	SEVERE NEED*	USDA DONATED FOODS VALUE	TOTAL PER MEAL REVENUE	DIFFERENCE BETWEEN FREE AND STUDENT AND ADULT PAID
Free	\$0.00	\$1.48	\$0.28	N/A	\$1.76	\$0.00
Reduced-Price	\$0.30**	\$1.18	\$0.28	N/A	\$1.76	\$0.00
Full-Price Elementary	\$0.60	\$0.26	\$0.00	N/A	\$0.86	-\$0.90
Full-Price Secondary	\$0.60	\$0.26	\$0.00	N/A	\$0.86	-\$0.90
Adult	\$1.50	\$0.00	\$0.00	N/A	\$1.50	-\$0.26
LUNCH						
CATEGORY OF MEAL BENEFITS	PRICE PAID	REIMBURSEMENT	60 PERCENT***	USDA DONATED FOODS VALUE	TOTAL PER MEAL REVENUE	DIFFERENCE BETWEEN FREE AND STUDENT AND ADULT PAID
Free	\$0.00	\$2.72	0.02	\$0.26	\$3.00	\$0.00
Reduced-Price	\$0.40****	\$2.32	0.02	\$0.26	\$3.00	\$0.00
Full-Price Elementary	\$1.00	\$0.26	0.02	\$0.26	\$1.54	-\$1.46
Full-Price Secondary	\$1.50	\$0.26	0.02	\$0.26	\$2.04	-\$0.96
Adult	\$3.00	\$0.00	0.00	N/A	\$3.00	\$0.00

*Schools where at least 40.0 percent of the lunches served during the second preceding school year were free or reduced-price qualify for additional "severe need" school breakfast reimbursement.

**The reduced-price breakfast cannot exceed \$0.30.

***Additional reimbursement rate paid if 60.0 percent of students are eligible for free or reduced price lunches.

****The reduced-price lunch cannot exceed \$0.40.

SOURCE: Current district meal prices and United States Department of Agriculture (USDA) reimbursement rates for the 2010–11 school year.

If the district does not raise prices as necessary to maintain the price of a full-price student breakfast and lunch, and an adult breakfast to a level that covers all of the costs of producing and serving the meal, the CNP will continue to lose funds on each of these full-price meals served.

Exhibit 8-7 shows the potential daily and annual (180 days) increase in revenue if prices are increased to the level of a reimbursable free breakfast and free lunch.

A \$20.43 breakfast revenue increase per day + \$167.64 lunch revenue increase per day = \$188.07 total revenue increase per day: \$188.07 x 180 days = \$33,853 additional revenue, annually. No count of breakfasts served to adults is available; therefore it is not possible to determine revenue increases if the district were to raise adult breakfast prices.

STAFFING AND PRODUCTIVITY (REC. 49)

The Food Service Department has not developed and does not use a district staffing formula. Written work schedules and menu-specific instructions are not provided to employees to direct food production and service.

The common measure for productivity in school kitchens is meals per labor hour (MPLH), the “meal” being one reimbursable lunch. All other sources of revenue such as reimbursable breakfasts, snacks, and a la carte and catering sales are converted to the equivalent of one reimbursable lunch or meal equivalent (ME). Food Service Directors and Finance Directors use MEs as the unit measure for kitchen productivity when evaluating efficiency and formulating staffing patterns to determine the appropriate number of staff per kitchen given its overall workload.

MEs are determined from meal count categories and other sources of revenue using the following ratios, their factors are rounded to nearest whole number.

- Lunch: 1 lunch = 1 meal
- Breakfast: 3 breakfasts = 2 meals (factor –0.66)
- Snack: 3 snacks = 1 meal (factor –0.33)
- Non-reimbursable food sales (a la carte and catering): Dollar amount divided by free reimbursement (\$2.74) + commodity value (\$0.26) = \$3

After determining the number of MEs a kitchen is producing, the MPLH is calculated by dividing the number of daily MEs by the number of paid labor hours.

Prior to using the MPLH guidelines, it must be determined whether a conventional or a convenience system of food production is used. The determining factor is whether the majority of the menu items are kitchen-prepared “from scratch”, or are purchased-prepared. An evaluation of the CISD February 2011 menus indicated that approximately 75 percent of the entrees served are purchased-prepared, therefore CISD operates a convenience system. However, kitchen-prepared entrees such as chicken a la king, nachos, spaghetti, lasagna, and Frito pie are also offered and are very popular with students. Kitchen-prepared menu offerings allow the district to better control the fat and sodium levels in the item and generally lower food costs because raw USDA donated foods are often used without paying a processing fee to a manufacturer. However, they do require more labor hours for preparation. Two frequent district offerings are submarine sandwiches and chef’s salad as a choice against the daily entree. Although not cooked, these entrees take time to prepare and assemble.

Exhibit 8-8 shows the calculation of MPLH for CISD schools. Each meal type is converted to MEs and the total is divided by the number of daily labor hours, resulting in MPLH. The first calculation combines middle and high

**EXHIBIT 8-7
REVENUE GENERATED USING CURRENT ADP AND INCREASED PRICING**

SCHOOL	BREAKFAST			LUNCH		
	DAILY FULL-PRICE ADP	DIFFERENCE IN REVENUE PER MEAL	POTENTIAL DAILY INCREASE IN REVENUE	DAILY FULL-PRICE ADP	DIFFERENCE IN REVENUE PER MEAL	POTENTIAL DAILY INCREASE IN REVENUE
Cotulla High School	1.3	\$0.90	\$1.17	29.9	\$0.96	\$28.70
Newman Middle School	7.1	\$0.90	\$6.39	36.90	\$0.96	\$35.42
Ramirez Burks Elementary School	11.5	\$0.90	\$10.35	60.6	\$1.46	\$88.48
Encinal Elementary School	2.8	\$0.90	\$2.52	10.3	\$1.46	\$15.04
Potential Daily Increase			\$20.43			\$167.64

SOURCE: CISD Monthly Record of Meals Claimed, November 2010.

**EXHIBIT 8-8
MEAL EQUIVALENTS (ME) AND MEALS PER LABOR HOUR (MPLH)**

MEAL TYPE	NUMBER SERVED	EQUIVALENTS	FACTORS	ME	÷	LABOR HOURS	MPLH
Newman Middle and High Schools							
Breakfasts	116	3:2	0.66	76			
Lunches	434	1:1	1	434			
Snacks*	0	3:1	0.33	NA			
Ala Carte	\$270	\$3.00:1	Total ÷ \$3.00	90			
Total Daily ME				601	÷	33	18.18
Ramirez Burks Elementary School							
Breakfasts	178	3:2	0.66	118			
Lunches	478	1:1	1	478			
Snacks	0	3:1	0.33	NA			
Ala Carte	\$80.00	\$3.00:1	Total ÷ \$3.00	27			
Total Daily ME				622	÷	37	16.81
Encinal Elementary School							
Breakfasts	48	3:2	0.66	32			
Lunches	111	1:1	1	111			
Snacks	0	3:1	0.33	NA			
Ala Carte	N/A	\$3.00:1	Total ÷ \$3.00	62			
Total Daily ME				145	÷	15	9.66

*All CISD schools are approved to provide snacks; however, they are only served at the elementary schools currently. The number of snacks claimed daily was not provided in the meal counts.

SOURCE: CISD Record of Meals Claimed, November 2010; and labor hours provided by the Food Service Director.

schools in that the high school transports food to the middle school. An hour was added to reflect the time the Food Service Director cashiers at the middle school.

Sample staffing guidelines based on MPLH are shown in **Exhibit 8-9**. When these standards are compared with CISD's MPLH, the CISD kitchens are producing according to the standard with accommodation to specific conditions such as the transportation of foods and people to the middle school from the high school and from Ramirez Burks Elementary to the Early Childhood Center. Also, approximately 25 percent of the entrees are kitchen-prepared, and time intensive preparations such as submarine sandwiches and entrée salads are prepared daily.

Encinal Elementary School's MPLH are low due to the size of the school's enrollment. There is room for growth in both the SBP and NSLP participation and in a la carte and catering sales. If staffing were reduced to 12 labor hours, a 12.08 MPLH would be achieved which is more in line with the standard.

According to the MLPH analysis, each CISD kitchen has sufficient labor hours to produce the necessary meals. The Food Service Director has done an excellent job of reducing the labor hours to meet the needs of each kitchen. The food service employees have done an excellent job of adjusting to the reduced labor hours although some expressed that they often feel rushed. This may be because three of the four district kitchens are staffed with only two employees. While sufficient, it is challenging to operate a school kitchen with such a limited number of staff members. It is important to remember that every job has three parts: prepare to work; do the work; and clean-up. In a two-employee kitchen, the same number of tasks must be performed as in a school with a larger staff; however, there are fewer people to complete them. This may explain why CISD food service employees complain that their kitchens are understaffed. This is also why, due to the economy of scale, larger schools can achieve higher MPLH than smaller ones.

In addition, the Food Service Director currently cashiers at the middle school during lunch. This is the most important time of day for the director to be free to travel to kitchens

**EXHIBIT 8-9
SAMPLE STAFFING GUIDELINES FOR ON-SITE FOOD PRODUCTION**

MEAL EQUIVALENTS	CONVENTIONAL SYSTEM		CONVENIENCE SYSTEM	
	MPLH	TOTAL HOURS	MPLH	TOTAL HOURS
10–100	12	8	16	6
101–150	12	8–12	16	6–9
145 – Encinal Elementary School			9.66 MPLH	15 hours
151–200	12	12–16	16	9–12
201–250	14	14–17	17	12–14
251–300	14	17–21	18	14–16
301–400	15	20–26	18	17–21
401–500	15	25–31	19	21–25
501–600	16	30–36	20	26–30
601 – Cotulla High and Newman Middle Schools			18.18 MPLH	33 hours
622 – Ramirez Burks Elementary School			16.81 MPLH	37 hours

SOURCE: Adapted from Financial Management Instructor Guide (2005) Ch 5, p 5-56 NFSMI, the University of Mississippi.

throughout the district to monitor compliance with recipes, portion sizes, counting methods, and cashiering procedures. An essential duty of the director is to monitor waste, and this can only be done during meal periods. The director also needs to be available to troubleshoot problems that may arise. It would be difficult to hire someone to come to work for such a short period of time; however there may be another school employee who could be assigned to cashier at the middle school cafeteria.

Under these circumstances, work must be more carefully planned to evenly distribute the workload, to maximize the labor resources, and to level out the workflow. In order to better achieve this, CISD could consider the following:

- Seldom are school food service employees other than managers, full-time (eight hours per day). As employees resign, consider hiring two three to four hour employees to replace one eight hour employee. Consider hiring one of these four hour employees for a position that could cashier for the middle school; serve as a substitute employee in all schools; and help in the central Food Service Office supporting the director when not performing other duties.
- Student labor is advantageous in that students can generally only work for short periods of time allowing for an hour at a time to be added to meet a specific need such as serving during the meal period to free the server to batch cook. The principal of the high school supported the idea of employing students

and suggested that perhaps the experience could be integrated into a vocational program, which could reduce the cost to the CNP. However, it is important to ensure that any use of student labor complies with state and federal labor standards including the Fair Labor Standards Act.

- Written direction such as recipes, food production records, and work schedules eliminate decision making for the employee. Making decisions takes time. These tools also help to ensure consistency in quality.
- When work is accomplished according to a plan, unnecessary tasks are eliminated; the work is equalized throughout the day and among employees; and there are fewer crisis periods.

The Food Service Director should work with school staff members to develop written daily work schedules and menu-specific instructions to eliminate crisis periods in the production and service of the meals. Initially it is a large undertaking, but it will improve operations and make best use of the available labor hours.

Begin with a list of tasks that must be completed on a daily basis with no consideration to the menu. Plot those tasks onto work schedules for employees, evenly distributing the workload and paying careful attention to the time it takes to complete the task, and the time the task must be completed. Get employee input when developing these daily tasks.

Identify the menu-specific tasks that must be completed for a full week of the cycle. If, for example, chopped onions are needed three times during the week, combine the amounts and assign them all to be chopped, measured and stored by one employee. This eliminates preparing to do the work and clean-up twice per week. Any excess time during the day should be scheduled to complete pre-preparation tasks for later in the week, such as, panning products, cutting fresh vegetables, or pulling products from the freezer and placing them in the refrigerator.

Prepare the menu and observe food production, modify the instructions as necessary. Once effective instructions are developed for each daily menu of the cycle, they can be reused each time that menu is served without additional effort. If the district fails to effectively plan the work performed in the individual school kitchens using current labor hours and written work schedules and menu-specific instructions, some of the employees will continue to feel overworked and may seek other employment.

This recommendation can be implemented with existing resources.

EMPLOYEE INCENTIVES AND PROFESSIONAL GROWTH (REC.50)

The district does not provide food service employees incentives to perform well and provides few opportunities for professional growth. The director indicated that she is interested in developing the food service staff as a team, whose members take greater ownership in the CNP at their individual schools. Work-related incentives can help employee morale and retention, as well as improving performance and enhancing the feeling of ownership in the organization.

Every employee has a need for recognition and praise. Given that CISD food service employees do not receive annual performance evaluations, there is no formal time set aside for the supervisor to discuss with the individual employee areas of their performance that could be improved, much less to offer praise for a job well done. The district does document performance problems in writing. An employee performance evaluation can help employees accomplish personal development and organizational goals, as well as providing an opportunity for feedback to the supervisor.

Performance and annual step raises are not available; according to the director the last raise was three years ago and it was a districtwide cost of living increase. There is no means

by which an employee can get a promotion, other than becoming a kitchen manager.

There is neither an annual training plan, nor established in-service training for food service personnel. The orientation session for entry-level employees includes the director reviewing the department handbook with the new hire, and one day of shadowing a lead employee. There are no regularly scheduled staff meetings. The district provides a four hour safety program four times a year and employees may attend the Regional Education Service Center XX (Region 20) summer training. There is no district offered special training sessions on topics such as customer service, proper serving methods, or cooking techniques. Employees may participate in web-based trainings but they are not given overtime or compensatory time to do so.

According to the director, there is no encouragement or financial support for employees to go to local, regional, state, or national professional meetings and conferences. The district provides no incentives for employees to become certified; and does not compensate for certification.

Safety shoes are purchased for each employee annually, but they are not popular with employees and some do not wear them. If it were possible to provide the employees with a selection of shoes to choose from, the district purchase would be more useful and greatly appreciated by the employees.

The Food Service Director shared the concern that as new businesses are established in Cotulla, some employees may choose to change employment. Long term, well-trained employees are a valuable asset and difficult to replace. If the district does not choose to enhance the work environment and experience for Food Service employees, some will possibly seek other employment, or continue to express frustrations with their jobs. Employees do a better job when they feel appreciated, can see that they are growing professionally, and that they are positively contributing to and have input into the goals of the organization.

The district should institute methods for recognizing employee performance and providing for professional growth.

The district should consider the following steps that will enhance the work environment and experience for CISD employees:

- Provide each employee with an annual performance review. This review will act as a means to help the employee plan professional growth and identify how

they can best contribute to providing CISD students with healthy, wholesome, and appealing meals.

- Develop an annual training plan designed to provide task-based skills and knowledge in areas that will enhance the employees' on-the-job performance and professional growth. Many districts schedule short regular staff meetings in which they provide an intense 10 minute lesson in addition to any planned discussions. In addition to providing training this opens communication among staff members, promotes teamwork, and allows employees to share successes.
- Encourage employees to participate in professional meetings, putting them in touch with others who do the same work as they do; and exposing them to new ideas that can be incorporated into district operations to improve the food and service delivered to students through the CISD CNP. Identify if there is a regional chapter of the School Nutrition Association that employees can be encouraged to join, or consider starting one. Chapter members really enjoy and look forward to attending the annual state and national conferences and often work together all year to raise travel funds. Some districts supplement registration fees or travel expenses for a select number of employees each year.
- Compensate certified employees with a higher hourly rate than non-certified employees. The certification program develops and encourages high standards for program operations. The district benefits from certified employees because of increased skills and knowledge in food safety, food preparation, and nutrition, helping to create a healthier school environment.
- Provide uniforms including visors or ball caps to employees as a reward for meeting goals such as increasing participation. Uniforms similar to those worn in fast food restaurants upgrade the look of the serving area and promote a team spirit. Employees appreciate work clothing they don't have to buy.

These steps will help the district to create a work environment where a cheerful, motivated staff provides CISD with an excellent CNP that delivers high quality food and service to children every day.

A fiscal impact is not assumed for this recommendation. Once the district determines which action to pursue, the cost or savings should be considered in the implementation.

USE OF DISPOSABLES (REC. 51)

The district uses an excessive and unnecessary amount of disposable service ware in the operation of the CNP. Less expensive types of disposables are available for use. For example, fruits, vegetables, and other products such as chili and cheese sauce for the chili cheese hot dog are served into 4 oz squats at a cost of \$0.016 each. This product could be replaced with 4 oz clear or black tray portion at a cost of \$0.007 each. The clear or black trays are just as attractive, less expensive, and perform the same function. At a minimum, CISD uses 2,388 four oz squat cups a day, two for each lunch served and one for each breakfast served. By using the clear or black trays in place of the 4 oz squats, the savings is \$21.49 daily x 180 days for a total annual savings of \$3,868.20.

Some schools use flat trays and others use disposable five compartment trays for students to transport their selection of foods to the table. In schools using flat trays, a plate or disposable boat must be used to serve the entrée; in schools using five compartment trays, the entrée may be placed directly on the tray. Five compartment trays eliminate the need for the extra piece of service ware.

The 2 lb disposable boat was used to serve the lunch entrée in all observed Cotulla schools (both those using flat and those using five compartment trays). Schools currently using the five compartment tray could totally eliminate the use of the 2 lb boat and serve the entrée directly onto the tray. Schools currently using a non-disposable flat tray could be converted to a five compartment tray and do the same. Instead of the student picking up an entrée and placing it on the five compartment tray, the entrée would be on the five compartment tray when the student received it. If the entrée were placed directly on a five compartment tray in all schools, it would reduce the cost of each lunch by the cost of the 2 lb boat or \$0.018. Based on the meals served during November 2010, on a daily basis 1,023 lunches are served. The daily savings is $\$0.018 \times 1,023 = \18.41 x 180 days or a total annual savings of \$3,314.52.

As with the service of the entrée, on days when very popular vegetables such as corn, mashed potatoes, and french fried potatoes are served, the majority of students take both the entrée and the popular vegetable. In response, one tray with, and one tray without the vegetable can be offered as a choice,

the server replacing the one selected, providing for additional savings.

The district also uses other disposables such as the hoagie clear which are plastic containers that cost \$0.31 each. These containers could be replaced with a waxed sheet or plastic wrap that are estimated to cost \$0.01 each. Twenty sandwiches are prepared per day in the hoagie clear is \$0.31 = \$6.20 daily x 180 days for an annual cost of \$1,116. The cost of using a waxed sheet or plastic wrap is 20 x \$0.01=\$0.20 daily x 180 days for an annual cost of \$36. The total annual savings is \$1,080.

Another practice popular with food service staff and students is to turn the serving spoons outward and allow students to serve themselves the vegetables onto compartmental trays. This can also be done with salads and fruit. Many self-serve bars are offered in commercial restaurants. Self-serve does not necessarily mean a larger portion. Long handled measuring spoons can be used, and the students informed that a serving is one spoon full. Even if some students take more fruit or vegetable than planned, the savings in disposables unused will more than cover the cost of the food. Many districts allow students to select as much fruit and vegetable as they like in that USDA is recommending increased consumption of fruit and vegetables. The test of how much the students should be allowed to take is how much food is discarded uneaten.

Prior to implementing any self-serve foods, CISD should consult with the state and local health departments to ensure that all necessary procedures are in place. This may mean installing sneeze guards or reducing the size of the sneeze guard in place on the hot table to allow for the student to safely self-serve.

Currently, CISD serves vegetables in 4 oz squat cups. By instituting a self-serve system, CISD would eliminate the use of these cups. Currently, the district spends \$0.016 per 4 oz squat cup on 1,023 meals served for a daily cost of \$16.37. Over a year period this cost \$16.37 x 180 days = \$2,946.24 annually x the number of food items that are no longer served as pre-portions.

One additional consideration is to return to the use of non-disposable five compartment trays in schools with dishwashing facilities. The debate between those in favor of disposables versus non-disposables has continued for decades. As to which is less costly is specifically dependent on conditions in each individual school; a study of this issue is a good investment of the Food Service Director's time. As the

prices of gasoline and waste disposal increase the price of using disposables will increase.

The cost savings from implementing this recommendation are thus estimated based on the two items that can be quantified. Additional cost savings the district could see from using non-disposable kitchenware cannot be quantified, but can potentially be realized after further research into the issue.

The potential savings in the examples provided in this recommendation are as follows:

- By using the tray portion cups instead of the 4 oz squats, the annual savings is \$3,868.20.
- By serving the entrée directly onto a disposable five compartmental tray, the district would eliminate the use of the 2 lb boat and save \$3,314.52. Since the review team's site visit, the district has discontinued using the 2 lb boat when serving on a five compartment tray. The food now goes directly on the tray. The savings are included in the total below.
- By replacing the hoagie clear plastic container with a waxed sheet or plastic wrap the district will save \$1,080 annually.
- By instituting a self-serve system, CISD would eliminate the use of 4 oz squat cups for an annual savings of \$2,946.24.

This is a total cost savings of \$11,209 annually. Best practices dictate that the Food Service Director should critically analyze all factors contributing to the cost, as well as other implications for the use of various styles of service for each school; and whenever possible eliminate the use of costly disposables.

FOOD COSTS AND THE ALTERNATE MENU PLANNING METHOD (REC. 52)

The percentage of revenue the district spends on food is excessive. According to information provided by the Finance Department, the total percentage of revenue spent on food by CISD in 2009–10 is 55.24 percent (**Exhibit 8-2**). The industry standard for food cost as a percentage of revenue is 40 to 45 percent. In the same exhibit the food cost attributed directly to the schools, 38 percent, is excellent. The source of the disparity between these two percentages will give direction to the district as to additional actions that may need to be taken.

The Traditional Meal Patterns require that a reimbursable breakfast contain:

- two servings of meat/meat alternate (M/MA); or 2 servings of grains/breads (G/B); or 1 serving of M/MA and 1 serving of G/B;
- 1/2 cup vegetable/fruit (V/F) or full-strength fruit or vegetable juice; and
- 1/2 pint of milk.

The Traditional Meal Patterns require that a reimbursable lunch contain:

- 1.5 ounce (Grades K-3) and 2 ounce (Grades 4-12) of M/MA;
- 1/2 cup of V/F (Grades K-3) and 3/4 cup (Grades 4-12) of V/F from two or more sources;
- one serving of G/B per day; 8 per week; and
- 1/2 pint of milk.

The current average per breakfast revenue for each of the four schools is \$1.70 (\$580 daily breakfast income ÷ 341 ADP); the current average per lunch revenue for each of the four schools is \$2.80 (\$2,864.36 ÷ 1023). At a food cost of 45 percent of revenue, the district has a total of \$0.765 for food for breakfast; and \$1.26 for food for lunch. Milk is a required component of both the reimbursable breakfast and lunch, and costs the district \$0.254 per half pint; leaving \$0.511 for breakfast and \$1.006 for lunch, to spend on the remaining components of each meal. Although these amounts are certainly sufficient to provide an appealing meal that meets all program requirements, there is little opportunity to exceed requirements or waste foods and still remain fiscally sound.

During the course of the review it was noted that there was moderate to excessive plate waste in all of the schools. Returned trays should be monitored frequently and immediate action taken any time a particular food is thrown away by students either in full or partial portions. Monitoring will clearly point out excessive portion sizes, low or

inconsistent quality, or foods that are simply unpopular with students. Although difficult to achieve, if not impossible, zero plate waste should be the goal of every school. Discarded foods contribute to no one's health and rob the department of resources that could be put to better use in other areas.

During the site visits to the schools, the review team observed the following:

- partial portions of tater tots, chili, and cheese sauce, steak fingers, chicken nuggets, mashed potatoes, and enchiladas were consistently discarded;
- whole pieces of hand fruit such as fresh apples were discarded; and
- at the high school, the ground beef and cheese used to prepare the enchiladas and the lasagna was double the required amount.

Exhibit 8-10 demonstrates the savings when the portion size of an entrée is reduced for the students in grades K–3. The reduction is based on 350 servings, approximately half of the enrollment at the two elementary schools plus the 17 meals served at the Early Childhood Center.

Similar items on the CISD menu (for which calculations could not be performed due to the procurement document not indicating the number of pieces per serving) are popcorn chicken, fish nuggets, pizza sticks with sauce, and ravioli. If each of these six items are served once every two weeks and the portion size on 350 servings (K–3) is reduced from 2 oz M/MA to 1.5 oz M/MA, the savings is an estimated \$184.80 per cycle (6 menu items x \$30.80 per menu item) x 18 cycles per year or \$3,326.40 annually.

One option the Food Service Department should consider is the Alternate Menu Planning Approach: USDA allows minor modifications for schools using the Traditional Menu Planning Approach. A seldom publicized fact is that the minimum required quantities of the M/MA component may be offered as a weekly total. A one ounce meat/meat alternate (or the equivalent) serving size is the minimum daily requirement. Therefore, if schools are offering (5 days x 2 oz

**EXHIBIT 8-10
EXAMPLES OF SAVINGS REALIZED WHEN MEAT/MEAT ALTERNATE PORTION SIZES ARE REDUCED
FOR GRADES PRE-K-3**

	CURRENT PORTION	COST	SUGGESTED PORTION	COST	PORTION COST REDUCTION	DAILY COST REDUCTION FOR 350 SERVINGS
Steak Fingers	4 Fingers	\$0.388	3 Fingers	\$0.291	\$0.097	\$33.95
Chicken Nuggets	4 Nuggets	\$0.316	3 Nuggets	\$0.237	\$0.079	\$27.65

SOURCE: ESC Region 20 bid award, 2010–2011.

M/MA) 10 oz of M/MA per week, some of the portions may be reduced to as little as 1 oz M/MA for any grade level as long as the total for the week is at least 10 oz M/MA. This is particularly easy to implement in districts such as CISD where there are daily entrée choices in every school. Prior to taking any action on integrating the Alternate Menu Planning Approach into the CISD Food Service operations, it would be wise to consult with the Texas Department of Agriculture (TDA) for their interpretation of this regulation.

Using the Alternate Menu Planning Approach, the district could reduce the portion sizes of M/MA on many entrees in addition to those mentioned in **Exhibit 8-10**; and at all grade levels. Based on interviews with students, the addition of a yogurt and fruit plate would be a welcome choice. One 4 oz container of yogurt is equivalent to 1 oz M/MA. Entrée salads and submarine sandwiches often offer several sources of M/MA; slightly reducing the weights of those components would go unnoticed. The same principle applies to products such as Frito pie, bean and cheese tostadas, macaroni and cheese, enchiladas, chicken a la king, and many other entrees. Nutritionally speaking, reducing the M/MA content also reduces the fat and saturated fat content of the menu item, which corresponds to USDA's requirement that calories from total fat cannot exceed 30 percent; and saturated fat cannot exceed 10 percent. One of the findings during the School Meals Initiative (SMI) review is that the district should reduce the fat and saturated fat in their menus. CISD would need to replace calories as necessary; however, seeing the savings demonstrated in **Exhibit 8-10**, significant additional savings could be realized.

Observations of plate waste in the middle school on February 7, 2011, demonstrated that full and partial portions of chili, cheese sauce, tater tots, and fresh fruit (apples and grapes) were discarded. **Exhibit 8-11** shows the possible savings the

district can realize if portion size is reduced. These savings are calculated on 500 portions, approximately half of the ADP.

The chili and cheese sauce were served as condiments to the hot dog. Approximately half of each portion was discarded. Both of these items are expensive and because they are accompaniments and do not contribute to the M/MA component of the meal, they should be conserved. By reducing the size of each portion by half, the district will save \$83.75 each cycle or \$1,507.50 annually on every 500 servings per cycle. The tater tots were served 11 per serving instead of the recommended 8 per serving equaling 1/2 cup. At three cents per serving, the district will save \$15 per cycle or \$270 per year by reducing the portion size by three pieces per portion (the portion size allowed by the state).

The fresh apple is used as an example. All whole hand fruits that provide double the sized serving as necessary contribute to significant amounts of discarded food, daily. CISD students were throwing whole and partial pieces of hand fruit away in all schools visited. Cutting fruit not only allows the district to offer a smaller portion, thus reducing cost, but students, particularly in the lower grades, but even in secondary schools have a tendency to eat more of the cut fruit than that served whole. The calculation ($\$30 \times 180 \text{ days} = \$5,400$ per year) would conservatively represent the savings.

While visiting the high school, it was determined that 60 pounds of ground beef was used instead of the planned 30 pounds on February 9, 2011. The exact same error was made the following day in the preparation of the lasagna; 30 pounds of ground beef \times \$1.86 per pound = \$55.80; if the same errors were made on each repeat of the cycle, the annual cost would $\$1,004.40 \times 2 \text{ incidents} = \$2,008.80$. There are two other menu items Frito pie, and BBQ beef on the current menu cycle where similar errors may be occurring. This is in one school.

EXHIBIT 8-11

EXAMPLES OF SAVINGS REALIZED WHEN PORTIONS NOTED AS DISCARDED ARE REDUCED IN SIZE

	CURRENT PORTION	COST	SUGGESTED PORTION	COST	PORTION COST REDUCTION	DAILY COST REDUCTION AT 500 SERVINGS
Chili	2 fl oz	\$0.188	1 fl oz	\$0.093	\$0.095	\$47.50
Cheese Sauce	2 fl oz	\$0.146	1 fl oz	\$0.073	\$0.073	\$36.25
Tater Tots	11 each	\$0.11	8 each	\$0.08	\$0.03	\$15.00
Fresh Apple	1 each	\$0.12*	1/2 apple cut in wedges	\$0.06	\$0.06	\$30.00

*The cost of the apple was not available, this is an estimated cost.

SOURCE: ESC Region 20 Bid Award, 2010–2011.

On February 2, 2011 the food production records indicated that the planned number of Frito pie servings was 130; enough ground beef and cheese was used to prepare 460 two ounce M/MA servings of Frito pie. A significant part of the excess servings were intentionally prepared to be used by the middle school; however, excess product was produced. Food production records for all schools should be checked to ensure that the practice of altering district recipes is isolated to the high school.

It is recognized that USDA actively promotes increasing the consumption of fruits and vegetables by all, and particularly by young people. The following recommendation should not be misinterpreted as reducing the food children may eat for breakfast and lunch to reduce costs; the point is to reduce tray waste in order to minimize costs. The funds taken from the trash can then be used to continually improve the quality of offerings with items such as kiwi, blueberries, strawberries, avocado, and star fruit that will bring interest to the cafeteria even when they are used only to garnish other foods.

Exhibit 8-12 shows the cost of 1/4 cup, 3/8 cup, and 1/2 cup vegetable and fruit portions. The last column shows the daily savings when 350 students in grades Pre-K–3 receive 1/4 cup instead of 1/2 cup portions of vegetables. Few

vegetables are popular enough with students to warrant 1/2-cup portions, particularly in the Pre-K–3 grade levels.

If the portion size were simply changed from 1/2 cup to 1/4 cup for all the vegetables listed in **Exhibit 8-12** the district would save on average \$31.29 daily x 180 days = \$5,632.20 annually.

The director should monitor tray waste at all grade levels to determine if any V/F portions are being partially eaten, and perhaps too large. If a 1/2 cup portion is too large but a 1/4 cup is too small, 3/8 cup or a #10 scoop will save the district half of the amount listed in the fourth column of **Exhibit 8-12** for every 350 portions.

Exhibit 8-13 shows that some of the district breakfast menus served during February 2011, offer an additional component that is not required by the meal patterns. If none of the foods offered are discarded by students, the menus should not be altered; however, it was noted during the observation of breakfast service, there is moderate to excessive plate waste, at least at the Ramirez Burks Elementary School.

The savings demonstrated in **Exhibit 8-13** is \$492.81 over a period of 20 serving days. This cycle will repeat nine times during a school year for an annual savings of \$4,435.33.

**EXHIBIT 8-12
SAVINGS REALIZED WHEN VEGETABLE PORTION SIZES ARE REDUCED
FOR GRADES PRE-K – 3**

VALUE OF COMMON PORTION SIZES OF FRUITS AND VEGETABLES				
	1/4 CUP	3/8 CUP	1/2 CUP	DAILY COST REDUCTION
Baked Beans	\$0.088	0.132	0.176	\$30.80
Beans, Pinto	\$0.088	0.132	0.176	\$30.80
Beans, Refried	\$0.076	0.108	0.152	\$26.60
Broccoli, 1 inch cuts	\$0.068	0.102	0.136	\$23.80
Corn, Whole Kernel	\$0.100	0.150	0.200	\$35.00
English Peas	\$0.091	0.137	0.182	\$31.85
Peas & Carrots	\$0.071	0.107	0.142	\$24.85
Green Beans, Short Cut	\$0.071	0.107	0.142	\$24.85
Mixed Vegetable	\$0.102	0.152	0.204	\$35.70
Apple slices	\$0.095	0.142	0.190	\$33.25
Fruit cocktail	\$0.105	0.157	0.210	\$36.75
Peaches, diced	\$0.098	0.147	0.196	\$34.30
Peaches sliced	\$0.098	0.147	0.196	\$34.30
Pears, diced	\$0.098	0.147	0.196	\$34.30
Pineapple tidbits	\$0.092	0.138	0.194	\$32.20

SOURCE: ESC Region 20 Bid Award, 2010–2011.

**EXHIBIT 8-13
ELIMINATION OF EXTRA COMPONENTS OF THE BREAKFAST MENU**

DATE SERVED	MENU ITEM	CONTRIBUTION	MEALS SERVED	COST OF MENU ITEMS	NUMBER SERVED	TOTAL COST AND RECOMMENDATION	SAVINGS
2/1/11, 2/8/11, 2/22/11	Breakfast on a Bun	2 servings of G/B and 1.5 servings of M/MA	342 ADP x 3 days	\$0.071 cheese slice \$0.082 ham \$0.148 bun	1026	\$0.301 Serve 1/2 sandwich at least to younger students.	\$159.03
2/3/11, 2/17/11, 2/24/11	Biscuit w/ Sausage Patty	2 servings of G/B and 1 oz M/MA	342 ADP x 3 days	0.116 per 2.2 oz \$0.164 per sausage patty	1026	\$0.23 Eliminate sausage or use smaller biscuit.	\$168.264
2/7/11, 2/21/11	Pancakes w/ Sausage Patty	2 servings of G/B and 1 oz M/MA	342 ADP x 2 days	\$0.078 per pancake x 2 =\$0.156 \$0.164 per sausage patty	684	\$0.32 Eliminate one pancake or the sausage.	\$53.35
2/14/11, 2/28/11	Waffles w/ Sausage Link	2 servings of G/B and 1 oz M/MA	342 ADP x 2 days	\$0.078 per waffle x 2 =\$0.156 \$0.164 per sausage link	684	\$0.32 Eliminate one waffle or the sausage link.	\$112.17

SOURCE: ESC Region 20 Bid Award, 2010–2011.

When investigating ways to reduce food costs the following questions are important to answer. CISD will recognize additional savings by focusing on each of these questions and potentially changing program operations.

- Are leftover foods used effectively?
- Is batch cooking in place to avoid or reduce over production?
- Is commodity processing effective in reducing costs or could some additional M/MA products be taken in raw form and used in kitchen-prepared foods? Chicken a la king has been very popular throughout the district. Perhaps there are other kitchen-prepared entrees that would be just as popular as, and less costly than purchased-prepared foods.
- Do district recipes for M/MA based products meet, but not exceed program requirements? Are the recipes followed?

To demonstrate the significance of the power of pennies, if 1/8 cup or 2 tablespoons of a vegetable is thrown away for every lunch the district serves in one year, the value of the discarded food would be \$7,551. The district should review district menus, recipes, food production records and all operational procedures associated with food production and service, use of leftovers, and processing USDA donated foods to identify potential savings. Particular focus should be

placed on the foods that are being discarded by students, and creative methods should be used to reduce the discard.

The estimated total cost savings from implementing this recommendation are \$22,580. These savings are based on the following:

- By reducing the portion size of M/MA on 350 servings (K–3) from 2 ounce M/MA to 1.5 ounce M/MA, there is an estimated savings of \$3,326.40 annually.
- By reducing the size of each portion of hot dog chili and cheese sauce by half, the district will save \$1,507.50 annually on every 500 servings.
- By reducing the tater tots portion by 3, the district will save \$270 per year.
- By cutting fruit instead of serving it whole, and reducing the portion size, the district would save \$5,400 per year.
- Twice during the review, 60 pounds of ground beef was used instead of the planned 30 pounds. If the same errors were made on each repeat of the cycle, the annual cost is \$2,008.80.
- By reducing the vegetable portions from 1/2-cup to 1/4 cup Pre-K–3 grade levels the district would save \$5,632.20 annually.

- By reducing the breakfast offerings, the district will save \$4,435.33 annually.

These savings are based on limited observations made during the review team site visit. Additional savings could be realized after a complete review of the district’s menus, recipes, and food production records.

INCREASE PARTICIPATION IN THE CHILD NUTRITION PROGRAMS (REC. 53)

The CISD Food Service Department has not set targeted goals for average daily participation (ADP) by school, and no marketing strategies are employed to increase participation in the NSLP and SBP. **Exhibit 8-14** shows current participation by category, by school. Breakfast participation in all schools could be increased; the elementary and the middle schools serve a higher percentage of students at lunch; however, there is room for improvement at each school in both programs.

As students, principals, and teachers were interviewed, it appears that customers are generally satisfied with the food that is served in the cafeterias; chicken a la king was recently added to the menu and it seems to be a favorite in all of the schools. However, there were comments made by the student focus group; that deserve mention.

- Some days the food is hot; some days it is cold.
- There isn’t enough time to eat, we have 30 minutes but the lunch line is long.

- There is not enough variety; we are on a two week cycle menu.
- Sometimes they run out and you get leftovers. They may run out of something at least once in a two-week cycle.
- When the bell rings, the cafeteria staff is still setting up the line.
- The snack bar is good, but there is still no variety.

The following sections address some of the areas in which the Food Services Department could improve and in turn increase average daily participation throughout the district.

FOOD QUALITY

The food served during the course of the review in cafeterias throughout CISD looked appealing, smelled good, tasted good, and appeared to be fresh. However, some of the foods were not held at the proper temperature, which can be perceived as a quality issue by the customer. Temperature was a problem at the middle school. Hot dogs were placed in buns and stacked in long pans prior to service. They did not maintain temperature, or quality. The buns were hard and dry on the edges and the hot dog was lukewarm. The server should place the hotdog onto the bun as students move through the serving line in order to maintain quality and temperature.

**EXHIBIT 8-14
CURRENT DAILY ADP AND GROWTH POTENTIAL IN THE SBP AND NSLP**

SCHOOL	ENROLL- MENT	CURRENT ADP BREAKFAST	BREAKFAST ADP AS A PERCENTAGE OF ENROLLMENT	POTENTIAL GROWTH BREAKFAST	POTENTIAL BREAKFAST GROWTH PERCENTAGE	CURRENT ADP LUNCH	LUNCH ADP AS A PERCENTAGE OF ENROLLMENT	POTENTIAL GROWTH LUNCH	POTENTIAL LUNCH GROWTH PERCENTAGE
Cotulla High School	281	38.9	14%	242.1	86%	198	70%	83.00	30%
Cotulla Middle School	276	76.8	28%	199.2	72%	236	85%	40.10	15%
Ramirez Burks Elementary School	545	178.2	33%	366.8	67%	478	88%	67.10	12%
Encinal Elementary School	122	48.2	40%	73.8	60%	111	91%	11.20	9%
District Totals	1,224	342.1	28%	881.9	72%	1,023	84%	201.40	16%

SOURCE: CISD Record of Meals Claimed, November 2010.

The district should implement the practice of routinely taking the temperature of all foods on the serving line to ensure that hot foods are served hot; and cold foods are served cold. Heating and maintaining food at the proper temperature is essential to ensuring quality as well as wholesomeness.

The fact that the recipes were not followed for two days in a row at the high school indicates that products are not standardized throughout the district; and from cycle to cycle. The district risks inconsistent and sometimes low quality products when standardized recipes are adjusted by the cook. Customers expect consistency in flavors, textures, appearance, and portion sizes.

Batch cooking foods so that they are not held for long periods of time prior to service improves quality. Staff members cook foods too early and hold them too long. Batch cooking is a challenge in two-employee kitchens unless the serving periods have breaks between them.

Some practices that improve the customer's perception of the food quality include: garnishing pans of hot food and individual servings of some of the cold offerings; keeping serving areas clean and well organized; portioning food carefully and directly onto the plate whenever practical, and wiping the rim of the tray if there is a spill. The appearance of food is an important contributor to the customer's perception of quality.

MENU VARIETY

Variety in menu offerings both within the meal and within the cycle is important to keep the cafeteria line interesting and exciting. Cycle menus are an essential management tool. The two concepts are not mutually exclusive. Consider the following techniques for increasing variety without losing the benefits of using a cycle menu:

- Offer a popular menu item every day. Ensure that the cost of these items is within the budget and that the nutrient content is in line with the district's goal of meeting the nutrient standards. Many foods commonly thought of as high fat, such as hamburgers and pizza can be very nutritious in that special products are formulated especially for CNP. When there is a popular item on the menu every day, more students participate and complain less about variety.
- Develop a variety of recipes for products such as entrée salads. The chef's salad served in many schools is always iceberg lettuce, ham, turkey, and cheese. If

an entrée salad is one of the choices each day, vary the mix of greens; offer a different protein source each day, i.e. cottage cheese, yogurt, nuts and a cheese stick, chicken salad, deviled eggs, hummus, or bean dip and cheese; offer a variety of salad dressings and other toppings; accompany the salad with different breads such as muffins, pretzels, tortilla chips, crackers, melba toast, dinner roll, or cornbread; and use fruit some days instead of vegetables. Appropriate garnishes will add nutrients as well as beauty and make the salads more interesting.

- Rotate menu items in and out of the cycle depending on what USDA donated foods are available or what is currently a popular item. When local restaurants are advertising a product such as a BBQ rib sandwich, take advantage of the popularity and the advertising and offer a similar sandwich on the cafeteria line.
- Rotate similar items in and out of each cycle. By changing one ingredient or the form that the product takes, all elements of the menu basically remain the same, but the product appears as a different item. Examples include: spaghetti with meat sauce or macaroni, beef and tomato casserole; meat loaf or Salisbury steak; chili cheese dog or all American hot dog; hamburger or cheese burger; pepperoni pizza or cheese pizza, and sloppy Joe or BBQ beef. Simply changing the dipping sauce for chicken nuggets each cycle will make the menu appear different to the customer; for example: BBQ sauce, cream gravy, honey mustard sauce, and ranch dressing.
- Offer choices within the menu that are very different from one another. The CISD Food Services Department currently offers menu choices such as beef and cheese nachos or chicken quesadilla; spaghetti or ravioli; and chicken nuggets or beef fingers. In each example, the items are too similar to be a good choice.
- Offer new and interesting items on the a la carte menu. Rotate flavors of cookies in and out; search the convenience stores for other appropriate foods that are popular with students. Items like yogurt and soft pretzels are very popular in some schools.
- The smaller the school, the less daily variety it can afford to offer unless the choices are carefully planned based on prior production; and leftover foods are

properly stored, reheated, and incorporated safely into future menus.

The easiest way to increase variety is within the V/F component of the meal pattern. Preparing and offering two or more vegetables, salads, and fresh and canned fruits greatly improves student satisfaction. Crackers, hot rolls and sliced bread can be easy choices in the G/B component, but kitchen-prepared quick breads such as cornbread or muffins are an appreciated change.

IMPROVING SERVICE

A long wait in a cafeteria line increases dissatisfaction with the meal. The lines at the Cotulla High School and the Ramirez Burks Elementary cafeterias are often longer than is a comfortable wait. This problem is enhanced if the kitchen staff is not completely set up and ready to serve when the students arrive. Each of these schools has two serving lines, but use only one for reimbursable meals. In both schools the district should invest in a second scanner, open two lines to reimbursable meals, and let one cashier serve both lines. The cashier may need to be moved outside the door and into the dining room to allow both lines easy exit from the serving line. At the high school, individually packaged a la carte items should be placed on both lines to increase sales. In other schools the cookies should be sold as an a la carte item as the student receives the reimbursable meal. No one wants to stand in line twice. A fiscal impact is not assumed for the additional scanner. Once the district determines which action to pursue, the cost or savings should be considered in the implementation.

The NSLP requires that students and parents have involvement in the operation of the programs. This often takes the form of a focus group to provide direction for the Food Service staff. This group of representatives from a variety of grade levels could also serve as taste testing participants. Soliciting the input of a focus group can identify areas for needed change and improvement. Students do not currently participate in the annual ESC Region 20 taste-testing activities. Taking students to this affair could give students input into the foods that are purchased and served.

One action principals and students can take to make meal service quicker is to ensure that every student has a student ID to present in the cafeteria. The high school line in particular is slowed due to the large number of students showing up with no student ID. The district should consider developing a policy to address this problem in that the ID is an important component of the district's counting and

claiming procedure as documented in the Policy Statement on file at the TDA, as well as a hindrance to quick moving serving lines.

All Food Service operations run out of food occasionally because when offering choices it is very difficult to predict what will be selected on any given day. The district should keep a very popular entrée item in stock and when the server recognizes that the entrée is running low, the popular item should be placed on the serving line as a choice. Fewer students will select the item that is running low, and all will be satisfied with their choice.

ADDITIONAL STRATEGIES TO INCREASE PARTICIPATION AND REVENUE

- Make it more convenient to participate. If possible, offer breakfast during a nutrition break after the students are assembled in their home rooms. Many students purchase snacks to start the morning; however, nutritional value as well as federal funding would increase if, instead, they would purchase a reimbursable breakfast at school. Breakfast hours are identified in federal regulations as meal service prior to 10 a.m. Districts who serve breakfast before the school day starts have lower levels of participation than districts who wait until after the school day has begun.
- Each time a class goes out to lunch as a reward for achieving a particular goal the Food Services Department loses revenue. Allow the Food Service Department to prepare a special party for the class to be rewarded.
- When a cafeteria is denied the opportunity to sell a la carte food items such as cookies due to the poor behavior of the students, the Food Service Department loses revenue. District administrators should find alternative ways to punish the students.
- Allow the Food Service Department to prepare take-out meals for students on field trips or at the very least, alert the kitchen a week in advance so that they may scale back food production and prevent leftovers that are costly and often must be discarded. Each time the Food Service Department is denied the opportunity to serve breakfast or lunch, federal reimbursement is lost.
- The snack bar is particularly appealing to high school students. Although the school is serving only 70

percent reimbursable meals, many other students are eating from the snack bar. If some of the snack bar offering could be grouped as a unit-priced meal, all students could make lunch selections from the snack bar and reimbursement could be claimed on those additional meals

- Don't serve free seconds. Since the review team's site visit, Cotulla ISD no longer provides free seconds. Students are now charged for all seconds.
- Garnish foods on the service line; shake some cinnamon onto the applesauce, a sprig of parsley on a side salad; or a quarter of a maraschino cherry on every other serving of peach slices. Garnish long pans of food on the hot table with some parsley in the corner, a tomato rose, a shake of paprika, or toasted bread crumbs, as appropriate.
- Plan special events such as drawings, place a sticker on random tray bottoms and award a small prize, celebrate monthly birthdays with a special low fat dessert, decorate the cafeteria for holidays, or display student artwork. Make the cafeteria an exciting and dynamic place to be.
- In talking with students in each school about what they would like added to the menu, without fail, someone suggested cake. Consider having a monthly birthday party and give each child who buys lunch a free piece of birthday cake. There is a delicious low fat cake in the USDA recipe file, and lower fat and sugar cake mixes are available.
- Adopt a color scheme, place a logo, or slogan on printed materials that presents a consistent appearance and message that is easily identifiable with the program.

The Food Service Director and school managers should establish targeted goals for student participation in the CNP and then use the various strategies presented in this recommendation to reach those goals. **Exhibit 8-15** shows the possible increase in revenue if participation in the breakfast program could be increased to 50 percent of enrollment in all schools; and lunch, 85 percent of enrollment at the high school, and 90 percent of enrollment at all other schools. The above mentioned percentages are high, but not uncommon in schools with a high percentage of students approved for free and reduced-price meals. This topic is further addressed under universal breakfast.

If the participation levels were increased to the above indicated percentage levels, the increase in revenue for breakfast would equal \$411.50 daily, or \$74,070 annually (180 x \$411.50); and the lunch revenue would increase by \$166.93 per day, or \$30,047.40 annually (180 x \$166.93), for a total annual increase of \$104,117.40.

Of the \$104,117.40 a 45 percent food cost would equal \$46,852.83; and a non-food cost would equal 10 percent or \$10,411.74. The normal 40 percent labor cost would not be required, in that currently all schools are producing less than the MPLH Guidelines, and Encinal Elementary would not need any additional labor. Using the cost of labor attributed to schools in 2009–10 of approximately 30 percent, an additional \$31,253.22 would be used for labor (\$46,852.83 food cost + \$10,411.74 non-food cost + \$31,253.22 labor cost = \$88,517.79 additional expenses leaving \$15,600 annual profit).

UNIVERSAL BREAKFAST (REC. 54)

CISD does not offer universal breakfast at any of the campuses. Universal school breakfast refers to serving breakfast to all children at no charge, regardless of their family income.

Breakfasts served as part of the federally funded SBP provide one-fourth or more of the daily recommended levels for key nutrients that children need. They are required to provide no more than 30 percent of calories from fat and less than 10 percent of calories from saturated fat.

According to the Food Research and Action Center (FRAC), studies conclude that students who eat school breakfast increase their math and reading scores as well as improve their speed and memory in cognitive tests. Research also shows that children who eat breakfast at school—closer to class and test-taking time—perform better on standardized tests than those who skip breakfast or eat breakfast at home. Evidence has grown that children who eat school breakfast are less likely to be overweight, and have improved nutrition—they eat more fruits, drink more milk, and consume a wider variety of foods than those who don't eat breakfast or have breakfast at home. Schools that provide universal breakfast in the classroom report decreases in discipline and psychological problems, visits to school nurses and tardiness; increases in student attentiveness and attendance; and generally improved learning environments.

Exhibit 8-16 shows the percentage of CISD students approved for free and reduced-price meal benefits by school

**EXHIBIT 8-15
CURRENT BREAKFAST REVENUE VERSUS INCREASED PARTICIPATION REVENUE**

MEAL TYPE	SCHOOL ENROLLMENT	BREAKFAST					LUNCH				
		CURRENT		50% ADP			CURRENT		85% AND 90% ADP		
		CURRENT ADP	PER MEAL REVENUE	TOTAL REVENUE	50% ADP	TOTAL REVENUE AT 50% ADP	CURRENT ADP	PER MEAL REVENUE	TOTAL REVENUE	HIGH SCHOOL 85% ADP AND ALL OTHER SCHOOLS 90%	TOTAL REVENUE AT HIGH SCHOOL 85% ADP AND ALL OTHER SCHOOLS 90%
Cotulla High School											
Free	223	37.60	\$1.76	\$66.18	111.5	\$196.24	162.9	\$3.00	\$488.70	189.55	\$568.65
Reduced	8	0.05	\$1.76	\$0.09	4.0	\$7.04	5.1	\$3.00	\$15.30	6.80	\$20.40
Full Price	50	1.30	\$0.86	\$1.12	25.0	\$21.50	29.9	\$2.04	\$61.00	42.50	\$86.70
Total	281	38.95		\$67.38	140.5	\$224.78	197.9		\$565.00	238.85	\$675.75
		Daily Increase				\$157.40	Daily Increase				\$110.75
Newman Middle School											
Free	225	68.4	\$1.76	\$120.38	112.5	\$198.00	191.9	\$3.00	\$575.70	202.5	\$607.50
Reduced	9	1.4	\$1.76	\$2.46	4.5	\$7.92	7.1	\$3.00	\$21.30	8.1	\$24.30
Full Price	42	7.1	\$0.86	\$6.11	21.0	\$18.06	36.9	\$2.04	\$75.28	37.8	\$77.11
Total	276	76.9		\$128.95	138.0	\$223.98	235.9		\$672.28	248.4	\$708.91
		Daily Increase				\$95.03	Daily Increase				\$36.64
Ramirez Burks Elementary School											
Free	446	164.6	\$1.76	\$289.70	223.0	\$392.48	400.2	\$3.00	\$1,200.60	401.4	\$1,204.20
Reduced	18	2.1	\$1.76	\$3.70	9.0	\$15.84	17.2	\$3.00	\$51.60	16.2	\$48.60
Full Price	81	11.5	\$0.86	\$9.89	40.5	\$34.83	60.6	\$1.54	\$93.32	72.9	\$112.27
Total	545	178.2		\$303.28	272.5	\$443.15	478.0		\$1,345.52	490.5	\$1,365.07
		Daily Increase				\$139.87	Daily Increase				\$19.54
Encinal Elementary School											
Free	105	43.5	\$1.76	\$76.56	52.5	\$92.40	96.5	\$3.00	\$289.50	94.5	\$283.50
Reduced	4	1.9	\$1.76	\$3.34	2.0	\$3.52	4.0	\$3.00	\$12.00	3.6	\$10.80
Full Price	13	2.8	\$0.86	\$2.41	6.5	\$5.59	10.3	\$1.54	\$15.86	11.7	\$18.02
Total	122	48.2		\$82.31	61.0	\$101.51	110.8		\$317.36	109.8	\$312.32
		Daily Increase				\$19.20	Daily Increase				Goal Exceeded

SOURCE: CISD Record of Meals Claimed, November 2010.

and districtwide, using information from the CISD approved status counts report for November 2010. Recommendations vary on the percentage of students approved for free and reduced-price meal benefits necessary to provide this service. As a general rule, schools with 85 percent or more free and reduced-price eligible students can serve universal breakfast and cover their costs through economies of scale. However, some schools with lower percentages of free and reduced-price eligible students can operate a universal breakfast

program that is financially self sustaining, depending on what their costs are.

Exhibit 8-17 demonstrates the increase in revenue between current breakfast revenue and projected breakfast revenue if a universal breakfast were implemented with 60 percent ADP at the high school; 70 percent ADP in the middle school; and 80 percent ADP at each of the elementary schools. It is important to note that even though total revenue increases in each school, the per breakfast revenue

EXHIBIT 8-16
FREE AND REDUCED-PRICE ELIGIBLE STUDENTS AS A PERCENTAGE OF ENROLLMENTS BY SCHOOL AND DISTRICTWIDE

	APPROVED FREE	FREE AS A PERCENTAGE OF ENROLLMENT	APPROVED REDUCED- PRICE	APPROVED REDUCED- PRICE AS A PERCENTAGE OF ENROLLMENT	APPROVED FULL-PRICE	APPROVED FULL-PRICE AS A PERCENTAGE OF ENROLLMENT	ENROLLMENT	NUMBER APPROVED FOR FREE AND REDUCED- PRICE	PERCENTAGE OF FREE AND REDUCED- PRICE
Cotulla High School	223	79.4%	8	2.85%	50	17.79%	281	231	82.2%
Newman Middle School	225	81.5%	9	3.26%	42	15.22%	276	234	84.8%
Ramirez Burks	446	81.8%	18	3.30%	81	14.86%	545	464	85.1%
Encinal Elementary	105	86.07%	4	3.36%	13	10.66%	122	109	89.3%
Districtwide	999	81.61%	39	3.19%	186	15.20%	1,224	1,038	84.8%

SOURCE: CISD Approved Status Counts Report for November 2010.

decreases. More revenue is received due to the increase in the number of meals served; however, the revenue available to provide one meal is reduced. This is caused by additional full-price students participating at the \$0.26 federal reimbursement rate with no severe need reimbursement or student payments received.

Current districtwide daily breakfast revenue is \$580.32 for 341 breakfasts generating \$1.70 per breakfast; projected breakfast revenue using 60.0 percent ADP at high school, 70.0 percent ADP at middle school and 80.0 percent ADP in the elementary schools is \$1,365.39 for 895 breakfasts yielding a \$1.52 per breakfast revenue, districtwide. When making the determination as to whether or not the universal breakfast program will break even, the district must determine if the projected percentages used in **Exhibit 8-17** are realistic for Cotulla ISD; and if a breakfast can be produced for \$1.52 in each school.

At a 45 percent food cost, total daily food expenditure is \$614.43, or \$0.69 per breakfast. In that the milk is \$0.254 per unit, and fruit and juice servings typically cost from \$0.11 - \$0.15; approximately \$0.29 is left for the entrée. The Food Service Director must research the market, evaluate products available through commodity distribution, and determine if there are sufficient popular breakfast entrees available at this price.

At 40 percent, daily labor costs are \$546.16, or \$0.61 per meal, which is probably higher than necessary. Additional labor will be needed to increase breakfast participation to the

levels indicated in **Exhibit 8-17**; Additional labor at the Cotulla High School, Newman Middle School, and Ramirez Burks Elementary would be useful in providing additional personnel during busy serving periods; and additional breakfasts at Encinal Elementary will help justify the labor hours currently assigned.

At 5 percent daily non-food costs are \$68.27, or \$0.076 per meal. The cost of a spork packet is \$0.015; a 2 lb tray is \$0.018; and a black 4 oz tray portion is \$0.007 for a total cost of disposables of \$0.04 per meal.

Of the \$1,365.80 total daily revenue, \$1,228.86 accounts for food, labor, and non-food expenditures necessary to provide breakfast for the projected 895 students, leaving 10.0 percent or \$136.94 daily profit. \$136.58 per day x 180 days = \$24,649.20.

The district should carefully evaluate whether or not to pilot a universal breakfast program. Actual participation and whether the Food Service Department can carefully plan and execute an affordable menu will determine if the service will prove fiscally sound.

The time breakfast is served will be critical in determining the actual participation. Offering a free breakfast to all students during the same serving period that is currently used may bring some additional students who currently are full-price eligible but will not significantly increase the number of free and reduced-price eligible students. This would be detrimental to the program in that the meals served to the full-price eligible students receive only \$0.26

**EXHIBIT 8-17
CURRENT BREAKFAST REVENUE VERSUS PROJECTED UNIVERSAL BREAKFAST REVENUE**

COTULLA HIGH SCHOOL

MEAL CATEGORIES	APPROVED BY CATEGORY	CURRENT			UNIVERSAL BREAKFAST WITH 60% ADP				INCREASE IN REVENUE
		CURRENT ADP BY CATEGORY	CURRENT % OF ADP BY CATEGORY	CURRENT PER MEAL REVENUE BY CATEGORY	CURRENT DAILY REVENUE	60% ADP PER DAY BY CATEGORY	PER MEAL REVENUE BY CATEGORY	DAILY REVENUE WITH 60% PARTICIPATION	
Free	223	37.60	16.85%	\$1.76	\$66.18	133.8	\$1.76	\$235.49	
Reduced-Price	8	0.05	0.63%	\$1.76	\$0.09	4.8	\$1.46	\$7.01	
Full-Price	50	1.30	2.60%	\$0.86	\$1.12	30	\$0.26	\$7.80	
	281	39.00	13.86%		\$67.39	168.6		\$250.30	\$182.95
Per Breakfast Revenue					\$1.73			\$1.48	

NEWMAN MIDDLE SCHOOL

MEAL CATEGORIES	APPROVED BY CATEGORY	CURRENT			UNIVERSAL BREAKFAST WITH 70% ADP				INCREASE IN REVENUE
		CURRENT ADP BY CATEGORY	CURRENT % OF ADP BY CATEGORY	CURRENT PER MEAL REVENUE BY CATEGORY	CURRENT DAILY REVENUE	70% ADP PER DAY BY CATEGORY	PER MEAL REVENUE BY CATEGORY	DAILY REVENUE WITH 70% PARTICIPATION	
Free	225	68.4	30.39%	\$1.76	\$120.33	157.5	\$1.76	\$277.20	
Reduced-Price	9	0.5	5.56%	\$1.76	\$0.88	6.3	\$1.46	\$9.20	
Full-Price	42	7.1	16.90%	\$0.86	\$6.11	29.4	\$0.26	\$7.64	
	276	76.0	27.53%		\$127.32	193.2		\$294.04	\$166.72
Per Breakfast Revenue					\$1.68			\$1.52	

RAMIREZ BURKS ELEMENTARY SCHOOL

MEAL CATEGORIES	APPROVED BY CATEGORY	CURRENT			UNIVERSAL BREAKFAST WITH 80% ADP				INCREASE IN REVENUE
		CURRENT ADP BY CATEGORY	CURRENT % OF ADP BY CATEGORY	CURRENT PER MEAL REVENUE BY CATEGORY	CURRENT DAILY REVENUE	80% ADP PER DAY BY CATEGORY	PER MEAL REVENUE BY CATEGORY	DAILY REVENUE WITH 80% PARTICIPATION	
Free	446	164.6	36.90%	\$1.76	\$288.66	356.8	\$1.76	\$627.97	
Reduced-Price	18	2.1	11.67%	\$1.76	\$3.70	14.40	\$1.46	\$21.02	
Full-Price	81	11.5	14.20%	\$0.86	\$9.89	64.8	\$0.26	\$1685.00	
	545	178.2	32.69		\$303.25	436.00		\$665.84	\$362.59
Per Breakfast Revenue					\$1.70			\$1.53	

ENCINAL ELEMENTARY SCHOOL

MEAL CATEGORIES	APPROVED BY CATEGORY	CURRENT			UNIVERSAL BREAKFAST WITH 80% ADP				INCREASE IN REVENUE
		CURRENT ADP BY CATEGORY	CURRENT % OF ADP BY CATEGORY	CURRENT PER MEAL REVENUE BY CATEGORY	CURRENT DAILY REVENUE	80% ADP PER DAY BY CATEGORY	PER MEAL REVENUE BY CATEGORY	DAILY REVENUE WITH 80% PARTICIPATION	
Free	105	43.5	41.46%	\$1.76	\$76.61	84.0	\$1.76	\$147.84	
Reduced-Price	4	1.9	47.5%	\$1.76	\$3.34	3.2	\$1.46	\$4.67	
Full-Price	13	2.8	21.54%	\$0.86	\$2.41	10.4	\$0.26	\$2.70	
Total	122	48.2	39.53%		\$82.36	97.6		\$155.22	\$72.85
Per Breakfast Revenue					\$1.71			\$1.52	

SOURCE: CISD Monthly Record of Meals Claimed, November 2010.

reimbursement. In order to be cost effective, the free and reduced-price eligible students must participate at a high level.

The universal breakfast will be most successful if it is provided at some point after the beginning of the school day. This is why breakfast in the classroom is so successful. The students do not have to come early to participate. Once they are there, they want to eat, but many will not make the effort to come early to eat.

Breakfast in the classroom is labor intensive; increases food waste; costs more in that all foods must be individually wrapped as purchased, or wrapped by employees; restricts variety of food offerings due to temperature control challenges, and may present problems of spills in the classroom. Breakfast in the classroom has drawbacks, but if

that is the only way to provide a universal breakfast, it is still worth considering. Some districts are able to schedule a short nutrition break each morning after the first bell rings when all students are brought to the cafeteria for breakfast. If this is possible in CISD schools, it is the most cost effective manner in which to structure universal breakfast programs.

Implementation of this recommendation may result in increased revenue for the CNP, but a fiscal impact is not assumed.

FISCAL IMPACT

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

RECOMMENDATION	2011-12	2012-13	2013-14	2014-15	2015-16	5-YEAR (COSTS) SAVINGS	ONE TIME (COSTS) SAVINGS
46. Develop targeted standards for expenditures by category (food, labor, and non-food) as a percentage of revenue.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
47. Increase the prices being charged to cater meals to the Early Childhood Center so that they are equal to the federal reimbursement rate including the value of USDA donated foods for a free meal.	\$2,020	\$2,020	\$2,020	\$2,020	\$2,020	\$10,100	\$0
48. Increase the prices of student full-price breakfasts and lunches; and the adult price for breakfast to equal the reimbursement for a free student meal.	\$33,853	\$33,853	\$33,853	\$33,853	\$33,853	\$169,265	\$0
49. Develop written daily work schedules and menu specific instructions to eliminate crisis periods in the production and service of the meals.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
50. Institute methods for recognizing employee performance, and providing for professional growth.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
51. Reduce the use of disposable service ware.	\$11,209	\$11,209	\$11,209	\$11,209	\$11,209	\$56,045	\$0
52. Reduce the cost of food by planning portion sizes by grade level.	\$22,580	\$22,580	\$22,580	\$22,580	\$22,580	\$112,900	\$0
53. Increase participation in the NSLP and SBP by marketing the programs.	\$15,600	\$15,600	\$15,600	\$15,600	\$15,600	\$78,000	\$0
54. Consider piloting a universal breakfast program.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS	\$85,262	\$85,262	\$85,262	\$85,262	\$85,262	\$426,310	\$0

CHAPTER 9

TRANSPORTATION

COTULLA INDEPENDENT SCHOOL DISTRICT

CHAPTER 9. TRANSPORTATION

Cotulla Independent School District operates a transportation program of nine bus routes that transport approximately 362 students per day. Services are provided to all four district schools and a limited number of out-of-district locations. The four in-district schools operate on what is effectively a common bell schedule with kindergarten through grade 12 students riding the bus together. The district reported total costs of \$375,387 and approximately 860,000 miles traveled in 2008–09. The large, rural service area presents a significant challenge to efficiency and reducing deadhead miles (miles driven to or from a route).

The department includes nine bus drivers, one Transportation Director and one shared clerk to manage nine active bus routes, oversee the maintenance of the school bus fleet, and support state reporting efforts. At the time of the review, the department had recently undergone a leadership transition and did not have a Transportation Director on staff, which resulted in the loss of a substantial amount of organizational history. Department employees have established a series of interim processes to ensure continuity of operations during the transition. This effort is indicative of the department's desire to re-establish an operational baseline that continues to promote the safe, reliable and effective transportation of students.

Small transportation operations face a significant challenge when deciding on the size of the department's management and administrative infrastructure. The legal and regulatory responsibilities, including state reporting, are the same for operations of 10 buses as they are for operations of 1,000 buses. Therefore, properly sizing a management and administrative team to oversee all aspects of transportation requires a clear definition of the functional responsibilities of the organization and an accounting of the financial and operational reporting required.

Establishing an appropriate distribution of duties between the Transportation Director and the shared clerical position should be part of the leadership transition currently occurring at CISD. Job descriptions for these two positions were not available, which prevents any analysis of how consistent current performance is with expectations. Creating job descriptions that specifically detail and allocate responsibility for common transportation functions would help ensure that the Transportation Department functions within a defined

set of service expectations rather than based on individual personalities. These job descriptions should detail such defined duties as driver recruitment, bus route development, data management, maintenance scheduling and management, state reporting, and cost control.

The key measures of cost effectiveness for a student transportation system include the annual cost per transported student and the annual cost per active route bus. A useful comparison is also to convert the annual cost to a daily cost, which is a typical industry standard for the pricing of contracted transportation services. **Exhibit 9-1** summarizes the metrics for CISD.

EXHIBIT 9-1 CISD TRANSPORTATION COST METRICS KEY MEASURES OF COST EFFECTIVENESS

MEASURE	METRIC
Annual Cost per Student	\$1,037
Annual Cost per Bus	\$31,282
Daily Cost per Bus	\$174
Buses per 100 Students Transported	3.3

SOURCE: TEA Student Transportation Reports 2008–09.

Analyzing the results of these metrics for small fleets must be done in the context of the operational environment. CISD has a large, low density service area which greatly limits the ability of the department to implement common efficiency techniques in transportation. This is clearly evident in the annual cost per student metric and the buses per 100 students metric. Both of these are key indicators as to overall efficiency because they reflect the number of resources required to transport a given population of students. As a result, it is more valuable to compare CISD costs to a group of similarly sized districts. **Exhibit 9-2** summarizes the cost per bus for CISD and three peer districts.

A comparative assessment of operational costs indicates that transportation costs at CISD are consistent with similar districts on a per student basis and substantially higher on a per bus basis. This is often the case when analyzing comparative efficiency and is due to differences in relative efficiency of operations. The lower buses per 100 students and the higher number of average students per bus indicate that CISD is doing a comparatively better job using asset

**EXHIBIT 9-2
PEER DISTRICTS COST COMPARISON**

DISTRICT	TOTAL COSTS	TOTAL BUSES	TOTAL STUDENTS	COST PER STUDENT	ANNUAL COST PER BUS	BUSES PER 100 STUDENTS	STUDENTS PER BUS
Cotulla	\$375,387	12*	362	\$1,037	\$31,282	3.3	30.2
Freer	\$285,219	10	74	\$3,854	\$28,522	13.5	7.4
Jim Hogg	\$163,783	16	94	\$1,742	\$10,236	17.0	5.9
Quanah	\$155,357	13	90	\$1,726	\$11,951	14.4	6.9

*This value has been adjusted to reflect the maximum number of active routes per CISD interviews.
SOURCE: TEA 2008–09 Operations Report and Vehicle Summary.

capacity. Overall, this is an indication that the routing scheme is doing a reasonable job of transporting the low density population.

ACCOMPLISHMENT

- CISD operates a single tier bell schedule, which is an efficient and cost effective method to pickup and deliver students in this rural low-density school district.

FINDINGS

- Transportation operations at CISD are conducted in the absence of specific policy and procedure guidance for service expectations.
- Transportation route management procedures do not adequately support complete and timely state reporting.
- CISD bus drivers are compensated at their standard driver rate during significant layover time when on extra-curricular trips.
- Fleet maintenance practices are informal and inadequate to support transportation operations.
- Fleet management practices are inadequate to ensure the effective management of assets.

RECOMMENDATIONS

- **Recommendation 55: Establish a consolidated transportation policy and operations manual.**
- **Recommendation 56: Redesign the student data and route data management practices to improve the timeliness of state reporting and the assessment of operational practices.**

- **Recommendation 57: Assess the impact of current standby time compensation strategies on total cost and employee retention.**
- **Recommendation 58: Establish fleet maintenance practices that provide for improved control over and analysis of maintenance costs.**
- **Recommendation 59: Establish fleet management practices to improve operating costs and to ensure that the size and structure of the fleet meets the needs of the district.**

DETAILED ACCOMPLISHMENT

BELL SCHEDULE

CISD operates a single tier bell schedule, which is an efficient and cost effective method to pickup and deliver students in this rural low-density school district. This bell schedule requires that students in all grades ride the bus together and that each individual bus route be capable of servicing each school in the district. While this type of routing scheme is not typically considered to promote efficiency, in the case of CISD it is the most appropriate method for the pickup and delivery of students.

The low density area served by CISD, coupled with the current transportation allotment formula, means that any multi-tier routing scheme would greatly increase deadhead miles and result in a negative impact on the allotment.

CISD has also instituted a practice that increases both the efficiency and effectiveness of services. An allowance has been made to allow for one bus to be staged in the Fowlerton area. This allowance helps mitigate the significant deadhead characteristics associated with travel to and from that area for the limited number of students served in that area. This customized approach is a reasonable and responsible response to the demographic and geographic characteristics of the district.

DETAILED FINDINGS

TRANSPORTATION POLICIES AND PROCEDURES (REC. 55)

Transportation operations at CISD are conducted in the absence of specific policy and procedure guidance for service expectations. There is very limited policy and procedure documentation to guide transportation service delivery. Clear and concise policies, procedures, and enforceable practices are essential elements of an effective and efficient transportation operation. Policies establish the parameters that prescribe the level of service that a transportation operation can provide. Equally important is the application of policies through well defined and documented procedures, operational practices, and protocols.

Within CISD there is a limited collection of policy and procedure documentation for transportation services. A limited statement of transportation eligibility is included in the student handbook along with a reference to the transportation policy and procedure manual to be distributed to parents of eligible students. Included in the student handbook are a summary of behavior expectations and a limited statement regarding opportunities for alternate pickup and drop off points. The transportation policy and procedure manual lists general rules and responsibilities for parents and students along with a brief description of accident procedures, extra-curricular trip requirements, and school closing procedures. These limited statements provide a minimum of guidance regarding the design of the transportation system. The limited nature of the policy documentation makes it difficult for any internal or external stakeholders to assess transportation performance against a set of defined expectations.

No single manual or document was available for review that details which students are eligible for service; what areas within the district are considered hazards for purposes of transportation services; the maximum time students are to ride the bus; or the expectations of all parties in the event of an accident. These are among the most basic expectations of service provisions and must be clearly defined for any Transportation Department to be considered a high functioning organization.

The absence of documentation has resulted in an operation that is wholly dependent on historical practices and individual personalities. Recent turnover in the department highlighted this concern when the review team was on site. Documentation of important operational data, such as current bus routes, maintenance records, and training

information, was not readily available. Obtaining even a portion of this most basic of information was only possible because of the small size of the operation and the presence of one individual who is the shared secretary between transportation and maintenance and one individual who serves as a substitute driver who knew the specific details of the bus routes.

This absence of documentation also exposes the operation to a number of potential issues, particularly in the event of an accident or incident. For example, if a bus were involved in an incident there are no student rosters available that would allow drivers or emergency personnel to verify who should have been and who actually was on board at the time of the incident. The primary reason this and other concerns have not been a significant issue for CISD is the limited scope of the operation. Establishing basic data management procedures will ensure that the operation does not become dependent on individual personalities but is guided by established policies, procedures, and operational practices.

The Transportation Director should immediately begin establishing a new consolidated transportation policy and operations manual. Initially, this manual should focus on critical planning and operational parameters including:

- Clearly define eligibility for services. A common structure is to link eligibility for transportation to the same distance criteria used by the Texas Education Agency for purposes of the transportation allotment. The current CISD transportation policy and procedure manual establishes this as the basic expectation for the district.
- Define hazard areas throughout the district that would make otherwise ineligible students eligible for services. The CISD school board must define and adopt these designated hazardous areas before these routes are submitted to the Texas Education Agency for inclusion in the transportation allotment.
- Establish guidelines and a process for students to be picked up or dropped off from an alternate address. This will ensure that route lists can be current in the event of an accident or incident on a bus. The existing student manual provides for this as an option and requires contacting the Transportation Department. However, the Transportation Department does not have established procedures on how this process will be managed.

- Define the expectations of all parties and the process to be followed in the event of an accident or incident on a bus. This would require an expansion beyond the information provided in the transportation handbook to include expectations of bus drivers, school staff, and transportation management staff.
- Establish a process to regularly record bus route information in a manner consistent with the Texas Education Agency requirements for the transportation allotment. A number of forms are provided on the Texas Education Agency (TEA) website to assist with this effort. Count information is already taken daily so the new process could expand on and improve these expectations.

Once these basic expectations for service delivery are established, it will be possible to more fully assess the performance of CISD's transportation services. Subsequent to creating the basic policy and operations manual, it should be placed on the CISD intranet and the district should undertake a regular effort to supplement and edit the manual. Future efforts can include incorporation of concerns common to virtually all transportation regardless of size including communications protocols, training expectations, student data privacy practices, and fleet management practices.

This recommendation can be implemented with existing resources.

TRANSPORTATION OPERATIONS (REC. 56)

CISD transportation route management procedures do not adequately support complete and timely state reporting. School districts must submit a number of documents to TEA as part of the student transportation allotment process. The TEA School Transportation Allotment Handbook provides school districts with guidance and instructions for tracking the required data and submitting the necessary reports to receive a transportation allotment. The instructions require that districts submit a School Transportation Route Services Report that details eligible mileage and ridership data for the school year. The report is required to be filed after the end of the school year and no later than July 1st. Additionally, the Student Transportation Operations Report that details all cost and all mileage incurred by the district for the completed school year must be submitted following the close of the school year and no later than December 1st.

A review of the Summary of Finances for the 2007–08 and 2008–09 school years indicated that CISD was initially scheduled to not receive any transportation allotment funding for either year. TEA staff indicated that this was due to the fact that CISD had submitted required data late. The district did eventually submit all the necessary data and received funding for both school years; however the district is currently late with their 2009–10 submission as well. This is likely the result of the lack of incomplete and ineffective data management practices within the Transportation Department.

CISD had established a limited documentation and reporting scheme to support the reporting requirements of the transportation allotment process. The TEA "Instructions for Completing the School Transportation Route Services Report" indicate that:

"An official, turn-by-turn, round-trip description measured to the nearest tenth of a mile is required for all eligible routes while they are in operation."

"An official count of eligible student riders must have been conducted for each route at least twice during the school year. All regular program subprogram routes are to have average daily ridership calculated and reported using the highest two official counts that were conducted and properly documented. Each route's eligible rider roster/official count record must include the items listed in subsections II.A.7 and II.A.8 of the School Transportation Allotment Handbook. Average daily ridership shall be determined separately for two-or-more-mile and combined two-or-more-mile and hazardous-area students."

The Transportation Department had established a process that required bus drivers to record the number of students riding the bus on a daily basis. However, this report did not separate the count of students into the required groupings of two-or-more-mile and combined two-or-more-mile and hazardous-area students as required by the allotment reporting process. Additionally, the handbook provided by TEA also requires that:

"A route that provides service to eligible regular, special, CTE, and private program students as defined in section I must have an official roster of eligible riders while the route is in operation. The roster shall be accurately maintained by the district or its designated contractor. A roster shall be developed at the time the route begins operation and kept updated as changes occur." [emphasis added]

No route rosters were available for review at CISD during the site visit. No reports were available to support the turn-by-turn reporting requirements. It is clear that in the past this information had been collected in order to complete the mandatory TEA reports, but none could be located at the time of the review. The lack of reporting infrastructure requires that CISD undertake a significant administrative effort to capture the necessary bus route data in order to comply with the transportation allotment submission process.

The Transportation Department should begin a formal process of capturing turn-by-turn route information and eligible student information in the required formats immediately. There are no processes or procedures in place to formally collect this information. TEA provides several sample forms and formats on its website to assist districts in their data collection efforts. These forms should be the starting point for new data management procedures in transportation that would improve the reporting capabilities and operations management practices of CISD transportation.

Funding is provided on the basis of linear density. Linear density of bus routes is determined based on the number of regular riders carried per mile of regular bus route during the school year. The amount that a district is reimbursed is based on the seven density groupings TEA has established. **Exhibit 9-3** summarizes the density groupings.

CISDs linear density is .001 (316 students/279,432 miles), which is well below the minimum grouping threshold found in **Exhibit 9-3**. However, CISDs actual cost per mile is \$0.52 so that serves as the effective allotment rate even though it is under the \$0.68 bottom tier of the formula. This is because

EXHIBIT 9-3
TEA DENSITY GROUPINGS

LINEAR DENSITY GROUP	MAXIMUM ALLOTMENT PER MILE
2.40 and above	\$1.43
1.65 to 2.399	\$1.25
1.15 to 1.649	\$1.11
0.90 to 1.149	\$0.97
0.65 to 0.899	\$0.88
0.40 to 0.649	\$0.79
Up to 0.399	\$0.68

SOURCE: Texas Education Agency, School Transportation Allotment Handbook, Effective School Year 2010–11.

the formula reimburses at the lesser of actual costs or the values set by the density tiers.

Rural, low density districts such as CISD must be highly cognizant of every mile traveled if they are to maximize their transportation allotment. For example, the significant deadhead requirement associated with multiple daily trips to and from Encinal Elementary greatly increases the number of miles traveled for CISD. The effect of this is, given a fixed number of students, a lower density grouping and a lower funding level. Consequently, it is important the Transportation Director actively reviews and assesses each mile traveled in order to assess the possibility of moving up or down one of the linear density groupings. This assessment can only occur if CISD improves its data management processes.

This recommendation can be implemented with existing resources.

DRIVER FIELD TRIP RATES (REC. 57)

CISD bus drivers are compensated at their standard driver rate during significant layover time when on extra-curricular trips. Despite the comparatively favorable costs, the compensation structure for bus drivers should be reconsidered. The Transportation Department should establish a standby rate for these trips that compensates drivers at a lesser wage for the layover period and at their driver rate only for the time they are actually driving the bus. The establishment of this rate would result in an incremental reduction in costs.

However, the fiscal impact cannot be estimated until the district has established such rates.

FLEET MAINTENANCE (REC. 58)

Fleet maintenance practices are informal and inadequate to support transportation operations. High functioning maintenance programs establish a nexus between pre-trip inspection procedures, preventive maintenance services and repair services as part of an effort to control the cost of maintenance and the disruption caused by vehicles being out of service. Fleet maintenance operations at CISD are fully outsourced to local and regional vendors. These vendors provide all services including preventive maintenance services and on-demand repairs. These services are generally acquired through the use of purchase orders and not through a competitive bidding process. Given the limited availability of vendors in the local market this approach is likely to be the only alternative to in-house provided services. CISD's limited

approach to maintenance management does not define expectations for the maintenance program or provide the opportunity to assess the effectiveness of services.

Pre-trip inspection of buses is both a regulatory issue and an important component of the maintenance program. Regulations associated with the Commercial Drivers License require a pre-trip inspection. The inspection provides the first indication of a maintenance concern and is a key component of vehicle safety and cost control. Pre-trip inspection forms have been created to comply with the requirements of the Commercial Drivers License. A review of the log books indicated that drivers were completing the forms as required by the regulations. However, a determination of the thoroughness and adequacy of the inspections was not made during the course of the review. Normally, the adequacy of the procedure can be evaluated through a review of maintenance work orders generated as a result of driver inspections. The lack of adequate maintenance documentation (see paragraphs below) prevented this type of analysis.

The lack of established procedures to ensure that vehicles receive appropriate preventive maintenance services is illustrative of the lack of structure in the maintenance program. A strong preventive maintenance program is the foundation of all other maintenance activities because it is the most important contributor to control of maintenance costs. The objective of a preventive maintenance program is to minimize equipment failure and reduce the cost of operations by maintaining a constant awareness of the condition of equipment and by correcting minor defects before they become expensive repairs. CISD could not provide any documentation of the service expectation for school buses. However, it is clear from accounting records that buses were being sent to vendors for service. The types of services performed and the consistency by which they were performed on established intervals could not be verified.

The most noteworthy and concerning aspect of the maintenance program was the almost complete absence of any structured recordkeeping on vehicle repair histories. Within the transportation office, a folder had been established for each bus that contained the title to the asset. In the absence of an automated recordkeeping system, this would normally be the location where repair records are retained; however, no such records were available. The primary record keeping mechanism for repairs was the invoice and payment process where unit numbers may be recorded on maintenance related transactions. While this approach is adequate to

address the financial management responsibilities of CISD, it is wholly inadequate as a method of tracking and analyzing vehicle repair histories. As a result, CISD was unable to provide any consolidated repair history on any particular bus or school vehicle during the course of the review.

The retention of vehicle repair history is both a maintenance management and a risk management concern. The ability to analyze vehicle repair history in order to assess the effectiveness of maintenance procedures, analyze the cost effectiveness of services and establish an appropriate plan for the replacement of assets is a basic component of any asset management strategy. The lack of service documentation including what repairs were performed on a vehicle, when they were performed, and the cost of the repairs prevents CISD from adequately assessing the life cycle cost of its school bus and school service fleets.

The connection between maintenance history and risk management is less obvious, but no less important. A vehicle's maintenance history supports district risk management practices through the ability to respond to inquiries in the event of an accident or incident. Assessing the relationship between the last time a vehicle component was serviced (i.e., brakes) and an incident (e.g., a bus skidding through an intersection) is an important component of ensuring that the district is acting in a reasonable and prudent manner when managing transportation assets. The current recordkeeping practices would make this type of response difficult at best.

To address the problems discussed in this recommendation, the Transportation Department should ensure that on-going reinforcement of the rationale for and the expectations of the pre-trip inspection process are provided to bus drivers. In addition, the Transportation Director should document a preventive maintenance program for its school buses including the types of services to be performed, expected intervals between services and the manner in which those services will be recorded for review by management.

This recommendation can be implemented with existing resources.

FLEET MANAGEMENT (REC. 59)

Fleet management practices are inadequate to ensure the effective management of assets. Fleet management is a separate and distinct activity from fleet maintenance. The fleet maintenance function is primarily responsible for ensuring that vehicles are safe, reliable and available when needed. The fleet management function is responsible for

ensuring that the district owns and operates an appropriate number of vehicles of the appropriate size and specifications to meet the needs of the district. The fleet management function is most closely aligned with the acquisition and disposal of assets.

CISD has not established any formal fleet management related policies or procedures. No guidelines relative to the desired retention period or the methodology used to determine when an asset should be acquired or disposed of were available. In the absence of these policies and procedures, it is fairly typical to see fleets that have larger than expected numbers of spare vehicles and an uneven distribution in the age of assets. Both of these characteristics were evident in CISD.

CISD operated nine bus routes at the time of the review. One of these routes was serviced by a multi-passenger vehicle that was not a school bus, leaving eight routes served by school buses. At the time of the review a total of 25 buses were included in the fleet inventory. Industry guidelines indicate that spare bus ratios should be approximately 10 to 20 percent of the active fleet. This would equate to the need for approximately one or two spare buses for CISD's current fleet. However, it is typical that small fleets have larger than normal spare fleets, up to as much as 40 percent of the active fleet particularly to account for extra-curricular trips. This would indicate that the maximum number of buses that should be required for CISD would be approximately 15. The current ratio is nearly two spare buses for every active route bus. Interviews with Transportation Department staff indicated that many of the spare buses are used for repair parts. **Exhibit 9-4** summarizes the inventory provided at the time of the review.

The Transportation Department should immediately begin the process of salvaging vehicles not used as an active route bus or to provide trip services. Salvaging these assets would provide a limited amount of revenue and would result in the avoidance of insurance and registration costs. As part of this effort, the five buses currently identified as dedicated trip buses should be assessed to determine if that is the appropriate number. In addition, CISD has three buses in their inventory whose status could not be identified at the time of this review. The Transportation Department should investigate the status of each of these vehicles to determine if they need to be actively incorporated into the fleet or salvaged. The Transportation Department should also establish a formalized replacement planning procedure that dictates the time and or mileage period when buses should be replaced. Industry

EXHIBIT 9-4
CISD INVENTORY OF BUSES

BUS NUMBER	YEAR	MILEAGE	STATUS
50	1998	97,664	Unidentified
40	1999	103,125	Active route bus
41	1999	127,337	Special Needs Active route bus
42	1999	92,402	Not in use
43	1999	151,559	Not in use
44	1999	130,703	Spare/Special Needs
45	1999	129,612	Not in use
46	1999	96,238	Not in use
47	1999	105,724	Not in use
48	1999	90,682	Not in use
49	1999	72,220	Not in use
51	2002	74,434	Active route bus
52	2002	97,485	Unidentified
53	2002	86,444	Active route bus
54	2003	103,434	Trip
55	2003	119,264	Active route bus
56	2004	34,736	Trip
57	2004	45,095	Trip
1	2008	14,945	Additional Special Needs bus
2	2008	41,160	Active route bus
3	2008	58,124	Active route bus
4	2008	31,225	Active route bus
5	2008	31,052	Trip
36	2009	18,665	Trip
37	2009	40,972	Unidentified

SOURCE: CISD Transportation Department. February 2011.

guidelines provided in a 2002 position paper by the National Association of State Directors of Pupil Transportation suggests a 12 to 15 year guideline for large buses and 8 to 10 years for smaller buses. Starting with these guidelines, The Transportation Department should establish age and mileage replacement criteria for the school bus fleet. Based on the current fleet inventory, the Transportation Department should consider salvaging all eleven (11) pre-2000 buses. These efforts would result in cost savings and one-time revenues of approximately \$6,281. The estimate is based on an assumed salvage of \$200 per unit, an average annual registration rate of \$60 per unit, and an average annual insurance cost of \$311 per unit.

Exhibit 9-4 indicates that CISD has not consistently set aside funding for the replacement of buses. There are no purchases in 2000 and 2001 and nothing from 2005 to 2007. This type of pattern typically indicates that fleet replacement funding is provided with unexpended funds at the end of a given year rather than part of a planned cycle of replacement. The proposed changes to the replacement schedule are intended to eliminate the backlog of vehicles that should have been replaced and provide guidance on how vehicles should be replaced in the future. These proposed changes are not intended to represent any new expenditures as the district would have to replace older vehicles at some point regardless. Assuming a 12 year cycle, the proposed

changes would require CISD to replace approximately two buses per year from 2014 through 2020 to establish the 12-year cycle. This would result in the early replacement of some assets, but would provide greater long term stability in both maintenance and operating costs.

The cost to purchase additional buses has not been estimated pending the district decision about structuring its fleet management schedule.

FISCAL IMPACT

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

RECOMMENDATION	2011-12	2012-13	2013-14	2014-15	2015-16	5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
55. Establish a consolidated transportation policy and operations manual.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
56. Redesign the student data and route data management practices to improve the timeliness of state reporting and the assessment of operational practices.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
57. Assess the impact of current standby time compensation strategies on total cost and employee retention.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
58. Establish fleet maintenance practices that provide for improved control over and analysis of maintenance cost.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
59. Establish fleet management practices to improve operating costs and to ensure that the size and structure of the fleet meets the needs of the district.	\$0	\$0	\$0	\$0	\$0	\$0	\$6,281
TOTALS	\$0	\$0	\$0	\$0	\$0	\$0	\$6,281