LEGISLATIVE BUDGET BOARD

Kingsville Independent School District

Management and Performance Review

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Management and Performance Review

January 6, 2023

Dr. Cecilia Reynolds-Perez, Ed. D.
Superintendent
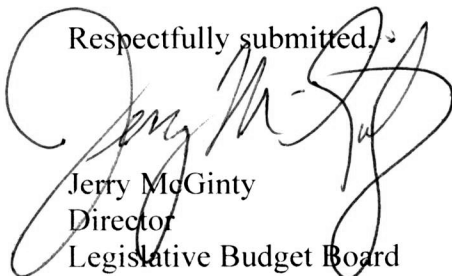Kingsville Independent School District

Dear Dr. Reynolds-Perez:

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

The report's recommendations will help Kingsville ISD improve its overall performance as it provides services to students, staff, and community members. The report also highlights model practices and programs being provided by Kingsville 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 report is available on the LBB website at http://www.lbb.texas.gov.

Respectfully submitted,

Jerry McGinty
Director
Legislative Budget Board

cc: Mr. Martin E. Chapa   Mr. Brian Coufal
    Mr. David R. Garcia   Mr. James Cusing
    Mr. Joe Mireles   Mrs. Elizabeth Ramos
    Mrs. Delma Salinas

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EXECUTIVE SUMMARY

LEGISLATIVE BUDGET BOARD SCHOOL PERFORMANCE REVIEW BACKGROUND

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

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

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

KINGSVILLE ISD

The School Performance Review Team conducted an onsite review of the Kingsville ISD in March 2022.

The review team identified 38 significant findings and recommendations in four major categories based upon the analysis of data and the onsite observation of the district's educational, financial, and operational services and programs.

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

Kingsville ISD is located in Kleberg County, approximately 45 miles southwest of Corpus Christi. The district is served by regional Education Service Center II (Region 2). Currently, the state legislators for the district are Senator Eddie Lucio, Jr., and Representative J.M. Lozano.

During school year 2021–22, Kingsville ISD's enrollment was 2,805 students, served by 457.5 full-time-equivalent staff positions. The district operates six campuses, including three elementary schools, one middle school, one high school, and a disciplinary alternative education campus. During school year 2020–21, the student population in Kingsville ISD was identified as 85.7 percent Hispanic, 9.7 percent White, 3.3 percent African American, and less than 1.0 percent each Asian, American Indian, Pacific Islander, and two or more races. Additionally, 82.0 percent of students were identified as economically disadvantaged.

FINANCIAL OVERVIEW

For school year 2021–22, Kingsville ISD adopted a budget of approximately $36.2 million. For school year 2020–21, Kingsville ISD's total actual expenditures for all funds were $34.0 million. Kingsville ISD's actual operating expenditure per pupil during school year 2020–21 was $9,828, compared to the state average of $11,106. During school year 2020–21, Kingsville ISD spent approximately 55.3 percent of total actual operating expenditures for instruction, compared to the state average of approximately 57.3 percent.

The district's total fund balances decreased by 8.2 percent from school years 2018–19 to 2020–21, with a total fund balance for school year 2020–21 of $8.9 million.

Kingsville ISD's School Financial Integrity Rating System of Texas rating was B/Passed for school year 2020–21. The district received a Smart Score of 2.5, with an academic performance rating of Very Low Academic Progress and a Low spending rate for school year 2020–21. See the **Business**

FIGURE 1
KINGSVILLE ISD ACCOUNTABILITY RATINGS
SCHOOL YEARS 2016–17 TO 2021–22

CAMPUS	2016–17	2017–18 (1)	2018–19	2019–20 (2)	2020–21 (2)	2021–22 (3)
Harrel Elementary School	Met Standard	Met Standard	F	Not Rated	Not Rated	C
Harvey Elementary School	Met Standard	Met Standard	D	Not Rated	Not Rated	C
Kleberg Elementary School	Met Standard	Improvement Required	F	Not Rated	Not Rated	N/A (7)
Perez Elementary School	Met Standard	Met Standard	A	Not Rated	Not Rated	Not Rated (3)
Gillett Intermediate School (4)	Met Standard	Improvement Required	D	Not Rated	Not Rated	C
Memorial Middle School	Met Standard	Met Standard	C	Not Rated	Not Rated	N/A (7)
King Early College High School	Met Standard	Improvement Required	Data Integrity Issues (5)	Not Rated	Not Rated	C
Pogue Options Alternative Academy	Met Alternative Standard	Met Alternative Standard	N/A (6)	N/A (6)	N/A (6)	N/A (6)
Districtwide	Met Standard	F	Data Integrity Issues (5)	Not Rated	Not Rated	C

NOTES:
(1)   The Legislature phased in a new accountability rating system for Texas public schools during this period. During school year 2017–18, school districts received an alphabetical rating, and during school year 2018–19, districts and campuses received alphabetical ratings.
(2)   Districts and campuses did not receive accountability ratings for school years 2019–20 and 2020–21 during the onset of the COVID-19 pandemic.
(3)   For school year 2021–22, a Not Rated label was assigned when the domain or overall scaled score was less than 70.
(4)   Gillett Intermediate School was the predecessor to Gillett Middle School and served grades five and six.
(5)   Not rated for data integrity issues indicates data accuracy or integrity have compromised performance results, making it impossible to assign a rating.
(6)   Pogue Options Alternative Academy was evaluated with alternative education accountability provisions in school years 2016–17 and 2017–18 but did not receive ratings for school years 2018–19 to 2021–22.
(7)   Kleberg Elementary School and Memorial Middle School closed in school year 2021–22.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2021–22.

Services Management chapter for more information about these rating systems.

EDUCATIONAL OVERVIEW

TEA issues accountability ratings for each district and campus. **Figure 1** shows the state accountability ratings for Kingsville ISD's campuses from school years 2016–17 to 2021–22. For school year 2021–22, the district received an overall rating of C and most individual campuses also received a C rating. TEA did not issue ratings for school years 2019–20 and 2020–21 during the onset of the COVID-19 pandemic. For school years 2016–17 to 2017–18, ratings for the district and its campuses ranged from Improvement Required to Met Standard. For school year 2018–19, two campuses earned D ratings and two campuses earned F ratings. The district and high school were not rated due to data integrity issues related to postsecondary data reporting, because TEA determined that data accuracy or integrity had compromised performance results, making it impossible to assign a rating for school year 2018–19.

Figure 2 shows academic performance measures for Kingsville ISD compared to the averages in these measures of school districts in Region 2 and the state. Kingsville ISD's academic performance is lower than regional and state averages for all measures.

ACCOMPLISHMENTS

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

CAREER AND TECHNICAL EDUCATION

Kingsville ISD's comprehensive career and technical education (CTE) program has a high enrollment rate. The district's CTE program offers various courses and certifications to develop students' career interests in grades nine to 12. Grade eight students receive a career exploration class and complete a survey to determine potential career interests. Kingsville ISD's CTE program offers 10 programs

FIGURE 2
KINGSVILLE ISD STUDENT ACADEMIC PERFORMANCE MEASURES COMPARED TO REGIONAL EDUCATION SERVICE CENTER II (REGION 2) AND STATE AVERAGES
SCHOOL YEAR 2020–21

ANNUAL COLLEGE, CAREER, OR MILITARY READINESS OF GRADUATES (1)	PERCENTAGE OF STUDENTS AT ALL GRADE LEVELS THAT APPROACHED GRADE-LEVEL STANDARD OR ABOVE ON STAAR TEST
Kingsville ISD 30.1%	Kingsville ISD 44.0%
Region 2 57.9%	Region 2 65.0%
State 63.0%	State 67.0%

PERCENTAGE OF STUDENTS AT ALL GRADE LEVELS THAT MET GRADE-LEVEL STANDARD OR ABOVE ON STAAR TEST	PERCENTAGE OF STUDENTS AT ALL GRADE LEVELS THAT MASTERED GRADE-LEVEL STANDARD OR ABOVE ON STAAR TEST
Kingsville ISD 20.0%	Kingsville ISD 6.0%
Region 2 37.0%	Region 2 15.0%
State 41.0%	State 18.0%

STUDENTS SCORING AT OR GREATER THAN CRITERION ON SAT OR ACT (2)	AVERAGE SAT SCORE
Kingsville ISD 10.8%	Kingsville ISD 928
Region 2 26.5%	Region 2 991
State 35.7%	State 1,019

Notes:
(1) To be considered college-ready, a graduate must have met or exceeded the college-ready criteria on the State of Texas Assessments of Academic Readiness (STAAR) end-of-course examinations, or the SAT or ACT standardized college admissions tests.
(2) Criterion refers the percentage of examinees who scored at or above the criterion score of 480 on the SAT evidence-based reading and writing or 19 on ACT English section and 23 composite and 530 on SAT mathematics or 19 on ACT Mathematics section and 23 on the ACT composite.
Source: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

of study: animal science; applied agricultural engineering; automotive collision repair technology; automotive service technology; business management; digital communications; engineering; entrepreneurship; healthcare therapeutic/ diagnostics; and teaching and training. District staff said they selected these programs of study based on industry demands, job wages, and degree offerings available at a local university, Texas A&M University – Kingsville.

INSTRUCTIONAL PROCESSES

Kingsville ISD has implemented several processes to improve instruction for students. During school year 2020–21, the district implemented a new instructional teaching coach (ITC) position at each campus. These staff observe, coach, and mentor teachers. They support the implementation of professional development, monitor and support the implementation of adopted curricula, and provide feedback or modeling to improve instructional practices. The assistant superintendent of curriculum and instruction also developed a process for instructional staff to contribute to developing curriculum guidance materials for the district. Teaching staff are invited to and ITCs are required to participate in, paid curriculum-writing sessions to develop curriculum-pacing guides. Staff report that these guides are helpful tools for classroom teachers, and this process builds the capacity and representation of instructional staff in the curriculum-development process.

Additionally, Kingsville ISD implemented a districtwide process during school year 2020–21 for analyzing student achievement data to guide curriculum and instruction. The assistant superintendent of curriculum and instruction and staff trained the administrators, teachers, and ITCs in the data-driven instruction (DDI) protocol. DDI practices include assessing student learning, analyzing the assessment data, and adjusting instruction at regular cycles in response to the data. Kingsville ISD's Curriculum and Instruction Department staff disaggregate student achievement data for teachers and administrators into several sets, including by campus, by grade level, by teacher, and by Texas Essential Knowledge and Skills curriculum standards. Once teachers have received professional development in the DDI protocol, they are equipped to analyze the data sets and to apply this analysis to improving their instructional planning and delivery on an ongoing basis

VEHICLE REPAIRS AND MAINTENANCE

Kingsville ISD's Transportation Department has reduced repair costs by using department staff to perform most of its ongoing repairs and maintenance. Until calendar year 2019, when the Transportation Department hired a full-time mechanic and mechanic's helper, the district contracted most vehicle repairs and maintenance to local mechanics and repair shops. This staffing has assisted the department to reduce costs for vehicle repairs significantly and has enabled the district to keep all buses operational to meet its transportation needs.

EVALUATIONS

Kingsville ISD's Human Resources (HR) Department has developed and implemented an effective and efficient process for conducting staff evaluations. The district annually distributes to each department head and campus administrator a timeline for when all nonteaching staff should be evaluated and when the evaluations must be submitted to the HR Department.

The HR Department also developed individual evaluation tools based on the job description for each position title, which enable the supervisor and staff to define goals and performance measures that are associated with positions. Each evaluation form is uniform for each position title across all campuses.

The HR Department provides annual training to supervisors on how to use the evaluation tools and how to establish employee goals and performance standards. HR staff maintain and update evaluation checklists for all district positions as each evaluation is submitted. During school years 2019–20 and 2020–21, all annual evaluations of noninstructional staff and principals were completed and submitted to the HR Department.

FINDINGS AND RECOMMENDATIONS

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

(1) Planning;

(2) Roles and Responsibilities; and

(3) Oversight and Evaluation.

PLANNING

Planning is an ongoing and essential process employed by effective school districts, which assists them to identify long-term needs, allocate the best use of resources, and implement stakeholder goals. The review team found many opportunities

for the district to guide its operations more effectively through improved planning.

Two important sets of plans developed by school districts are the district improvement plan (DIP) and the campus improvement plans (CIP). These statutorily required annual plans are intended to guide school district staff in the improvement of student performance. However, Kingsville ISD lacks a process to develop and administer its DIP and CIPs effectively.

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

Additionally, the district lacks a comprehensive, multiyear strategic planning process that sets measurable goals, addresses the long-term needs of all areas of the district, and directs the use of district resources. The lack of an effective process for long-term planning to guide its campuses, departments, and programs reduces the district's ability to address unforeseen events, allocate resources to achieve goals, or establish accountability standards.

Furthermore, Kingsville ISD's budget development process does not incorporate input effectively from campus administrators and department heads, align with district and campus improvement plans, nor assist in the preparation of long-term spending plans. Limiting principals' and department heads' involvement in the budget development process, especially concerning long-term planning, prevents valuable input from those most familiar with daily operations. Making budgetary decisions that are not based on the student performance goals outlined in the DIP and CIPs could result in inefficient and ineffective spending. Additionally, the failure to align resource allocation with improvement planning limits the improvement strategies that can be implemented.

Kingsville ISD also lacks key operational plans, including a cybersecurity plan, a technology disaster-recovery plan, and a vehicle replacement plan.

The following recommendations would assist the district's planning:

- establish procedures to coordinate the development and implementation of district and campus improvement plans that include a defined calendar for implementation, site-based decision-making committees, and required progress reporting;

- develop a three-year to five-year comprehensive strategic plan with measurable objectives to align all areas of district operations and serve as a framework for district decision making;

- develop and implement a budget development process that aligns with campus and district improvement plans and incorporates input from campus administrators and department heads;

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

- develop a cybersecurity plan and a technology disaster-recovery plan, and update these plans regularly; and

- develop a vehicle replacement plan that includes industry-standard criteria.

ROLES AND RESPONSIBILITIES

An effective organizational structure and efficient staffing are essential to maintaining a high-functioning school district. Clearly defined roles and responsibilities improve staff performance and support the effective management of district operations. It is important to balance the overall workload of an administrator between manageable supervisory responsibilities and other executive duties.

Effective school boards focus on oversight of management, policy making, planning, and evaluation, and understand that the implementation of board policy and daily administration of the district are the superintendent's responsibilities. However, Kingsville ISD board members sometimes overstep their roles by intervening in the daily operations of the district. Board members' lack of understanding of their roles and responsibilities may be the result of inconsistent training and failure to meet continuing education requirements pursuant to statute.

Kingsville ISD also does not have an effective and efficient organizational structure relative to the superintendent's supervisory responsibilities. Kingsville ISD's superintendent directly supervises and evaluates 10 staff from six functional

areas, compared to superintendents at peer districts that have from three to eight directly reporting positions, which is more consistent with best practices for executives. Staff reported that the level of responsibilities taken on by the superintendent is in response to the district's poor academic performance during previous years. Although the current administrative structure may help the district focus on improving academics, the superintendent's daily responsibilities and duties related to managing staff may diminish the time available for executing other essential job duties, such as district oversight, district planning, and district goal setting. By assigning the superintendent numerous responsibilities, the district's performance depends overwhelmingly on the leadership and guidance of one individual.

Additionally, Kingsville ISD lacks clearly defined roles and responsibilities for safety management. For school year 2020–21, Kingsville ISD has not established a formal safety and security committee (SSC) as required by statute and board policy. In the absence of an SSC, many of the key roles of the committee are being carried out primarily by the executive director of school improvement, such as overseeing emergency operations plan development and drill monitoring, safety and security audits, and making safety and security recommendations to the board and district administrators. According to staff interviews, these responsibilities were not in the executive director of school improvement's original job description and were not defined clearly. This lack of clearly defined roles and responsibilities leads to safety and security decisions made without sufficient stakeholder representation and input, places an undue burden on the time and efforts of the assigned administrator, and could result in critical safety and security functions being neglected, delayed, or ineffectively carried out.

The district also lacks organizational structures to coordinate academic and behavior interventions and implement them consistently. TEA recommends that districts implement a multitiered system of support (MTSS), which is a framework of interventions and supports intended to address student's behavioral and academic challenges. MTSS assists campuses and districts to organize resources by aligning academic standards and behavioral expectations and sustaining that organization to accelerate students' performance to achieve or exceed proficiency. However, each Kingsville ISD campus implements interventions differently because the district has not assigned staff to develop an effective districtwide MTSS process. Failure to implement a consistent and appropriate

intervention process may continue to result in poor academic performance, especially for students who are struggling or who are at risk of poor performance.

The following recommendations would assist the district in establishing effective roles and responsibilities:

- modify the school board's continuing education training process to ensure that board members receive all required trainings;

- modify the district's organizational structure to decrease the superintendent's supervisory responsibilities and reorganize the educational and operational functions of the district;

- develop a procedures manual to guide safety and security operations in the district;

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

- implement a multitiered system of supports process districtwide and regularly evaluate student intervention programs for effectiveness.

OVERSIGHT AND EVALUATION

Effective and efficient school districts have systems of oversight and measurable performance metrics to hold administrators and staff accountable for achieving goals. Kingsville ISD has not developed performance goals or standards for accountability in the areas of educational service delivery, transportation, food services, human resources, safety and security, or business management.

Kingsville ISD also does not provide central supervision for the district's gifted and talented (GT) program to meet program goals and state requirements. The GT program does not include a curriculum, and GT services are determined at the classroom level without guidance from the district. As a result, Kingsville ISD's GT program is noncompliant with several components of the Texas State Plan for the Education of Gifted and Talented Students, including the areas of fidelity of services, service structure, curriculum and instruction, and family and community involvement. Without district oversight to maintain a robust GT program, Kingsville ISD is underserving this student population and falling short of its responsibility to promote high academic achievement for GT students.

Although district staff oversee the Transportation Department, Kingsville ISD does not compare its

transportation services against established benchmarks, key performance indicators, or data from peer districts to identify areas of improvement. Without a system to evaluate transportation operations, the district is unable to make data-driven decisions supported by objective evidence. Kingsville ISD's transportation costs are higher than its peer districts and developing a performance measurement system could enable the district to identify inefficient operations and opportunities to lower costs.

Kingsville ISD also has not established expectations and measures for food service program performance. This lack of standards limits the district's ability to oversee department operational performance effectively and identify issues to make informed management decisions. The food service director is not provided opportunities to share food service department performance with district administration and is not a part of the district leadership team. This lack of oversight prevents district administration from identifying barriers to optimal program performance, such as the factors contributing to a decrease in the district's meal participation rates.

Kingsville ISD lacks a process to evaluate the effectiveness and efficiency of its HR operations. The district does not set annual performance goals for the HR Department nor apply performance measures to assess the effectiveness of HR services. Additionally, the district does not survey staff regularly regarding HR functions or solicit staff opinions regarding HR operations.

The district lacks a clearly defined contract-management function to ensure adequate administration, evaluation, and oversight of district contacts. The Finance Department does not have written contract-management procedures or a centralized file of original contracts. Without these tools, the district is unable to monitor its contracts sufficiently or conduct cost-benefit analyses on renewals, which places the district at risk for rising contract costs and poor-quality services or products.

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

- develop and implement a comprehensive program for GT students to meet their instructional needs;

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

- establish a performance-measurement system that enables district leadership to evaluate the food service

program and make informed decisions for the use of limited resources;

- develop annual goals for each HR activity and establish performance measures to evaluate the effectiveness of the HR function overall; and

- implement controls to improve contract-management functions.

The following chapters summarize the district's accomplishments and the review team's findings and numbered recommendations. Detailed explanations for the accomplishments and recommendations include estimated fiscal impacts. Each chapter concludes with fiscal data, when appropriate, showing the chapter's recommendations that have estimated savings or costs for school years 2022–23 to 2026–27.

1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT

FINDINGS

♦ Kingsville ISD board members lack a clear understanding of their roles and responsibilities.

♦ Kingsville ISD board members lack an understanding of various board operations, which inhibits effective stewardship of the district.

♦ Kingsville ISD does not have an effective and efficient organization relative to the superintendent's supervisory responsibilities.

♦ Kingsville ISD lacks an effective process to develop and administer its district and campus improvement plans.

♦ Kingsville ISD lacks a comprehensive, multiyear strategic-planning process that sets measurable goals, addresses the district's long-term needs, and directs the use of district resources.

RECOMMENDATIONS

♦ **Recommendation 1: Modify the school board's continuing education training process to ensure that board members receive all required trainings.**

♦ **Recommendation 2: Establish a process to review and update board operating procedures annually.**

♦ **Recommendation 3: Modify the district's organization to decrease the superintendent's supervisory responsibilities and reorganize the educational and operational functions of the district.**

♦ **Recommendation 4: Coordinate the development and implementation of district and campus improvement plans through procedures that include a defined calendar for implementation, site-based decision-making committees, and required progress reporting.**

♦ **Recommendation 5: Develop a comprehensive strategic plan ranging from three years to five years, with measurable objectives to align all areas of district operations and serve as a framework for making district decisions.**

BACKGROUND

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

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

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

Kingsville ISD is located in Kleberg County and serves the city of Kingsville, approximately 45.0 miles southwest of Corpus Christi. According to the U.S. Census Bureau, Kingsville had a population of 25,402 in calendar year 2020, a decrease of 3.1 percent from 2010. From 2016 to 2020, the median household income in Kingsville was $46,053. **Figure 1–1** shows the demographics of the population of Kingsville.

During school year 2021–22, Kingsville ISD employed 457.5 full-time-equivalent staff positions, and the district had 2,805 students enrolled. The most recent demographic

data from school year 2020–21 shows the student population was 85.7 percent Hispanic, 9.7 percent White, 3.3 percent African American, 0.9 percent Asian, 0.1 percent American Indian, 0.1 percent Pacific Islander, and 0.2 percent reported as two or more races. Student enrollment has decreased in Kingsville ISD by 17.3 percent during the past five school years from 3,392 students in school year 2017–18 to 2,805 students in school year 2021–22.

The district has six campuses that include Harrel Elementary School, Harvey Elementary School, Perez Elementary School, Gillett Middle School, King Early College High School, and Pogue Options Alternative Academy.

The Kingsville ISD Board of Trustees is the policymaking body authorized by law to govern the district. The board has the following duties:

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

The board's seven members serve four-year terms, and elections are held every two years. The Legislative Budget Board's (LBB) School Performance Review Team visited the district in March 2022. At the time of the onsite visit, one of the seven board positions was vacant due to the death of the former board president in February 2022. This vacant position was scheduled to be filled through the school board election in May 2022. **Figure 1–2** shows Kingsville ISD's board members and their respective roles and experience as of March 2022.

The district conducts monthly public board meetings facilitated by the board president. The board typically meets on the third Tuesday of each month in the boardroom located at the Kingsville ISD Administration Building. Board Policy BE (LOCAL) states that the district may call special meetings at the board president's discretion or upon the request of two board members. From January 2021 to March 2022, the district held nine special meetings.

The public may attend all regular meetings and may address the board on topics of interest. Individuals who want to address the board or provide public comment must register at least five minutes before the start of the meeting and indicate the topic of the presentation. In compliance with the Texas Open Meetings Act, district staff post public

FIGURE 1–1
KINGSVILLE DEMOGRAPHICS, CALENDAR YEAR 2021

RACE OR ETHNICITY	KINGSVILLE
Hispanic or Latino	75.3%
White	16.6%
African American	3.8%
Asian	2.7%
American Indian and Alaskan Native	0.2%
Two or More Races	9.0%

NOTE: Race and ethnicity are considered separate and distinct identities within U.S. Census Data. Hispanic or Latino origin is considered an ethnicity in census data and is asked in a separate question from race. Therefore, percentages shown may not sum to 100.0 percent.
SOURCE: U.S. Census Bureau, Population Estimates for July 1, 2021.

FIGURE 1–2
KINGSVILLE ISD BOARD OF TRUSTEES
SCHOOL YEAR 2021–22

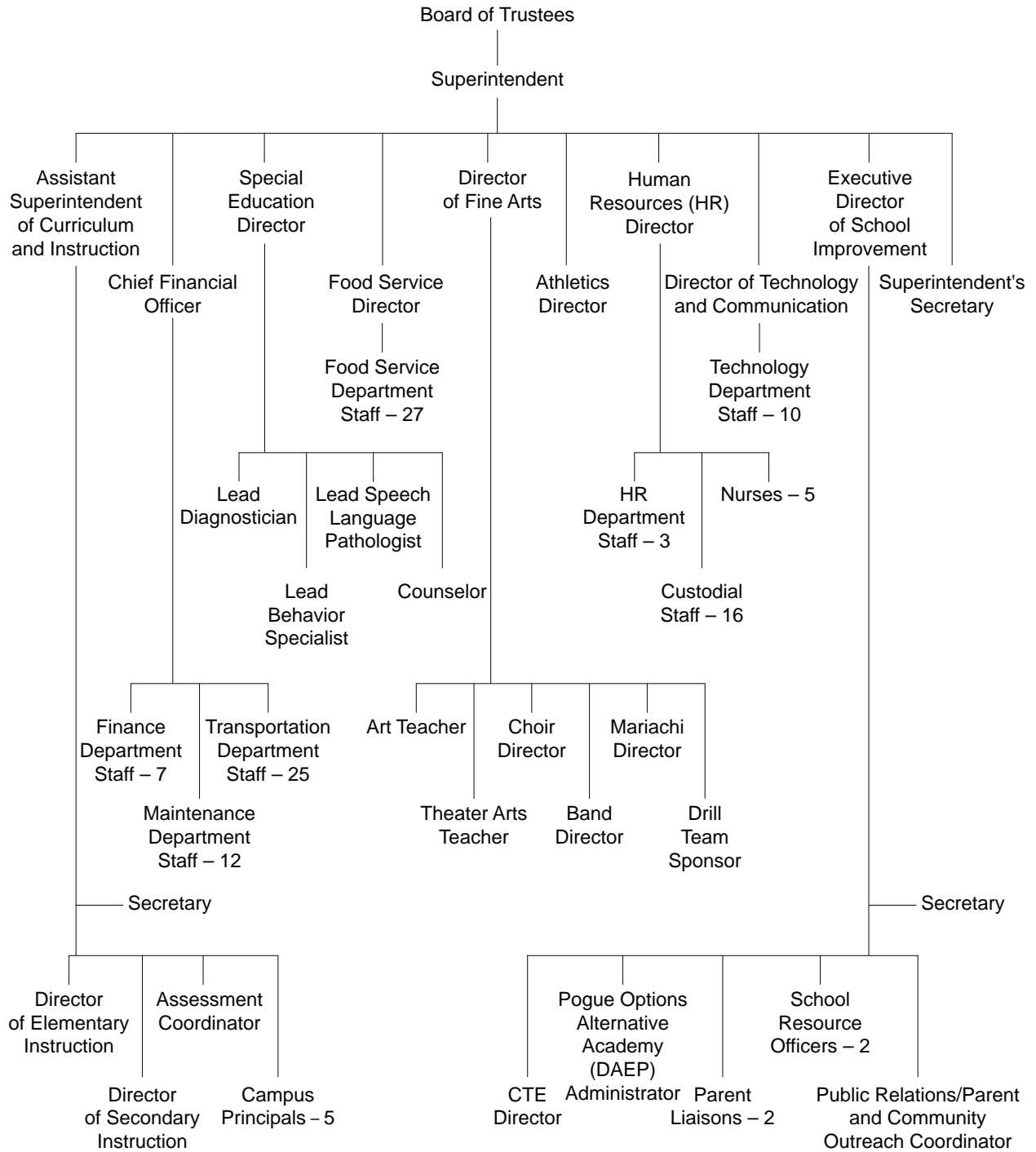| MEMBER	ROLE	EXPERIENCE
Steven Crites (1)	President	3 years, 9 months
David Garcia	Secretary	1 year, 3 months
Brian Coufal	Member	9 years, 3 months
James Glusing	Member	1 year, 3 months
Elizabeth Ramos	Member	1 year, 3 months
Delma Salinas	Member	1 year, 3 months

NOTE: (1) One position was vacant as of March 2022. Since the Legislative Budget Board's School Performance Review Team's onsite visit, Steven Crites has left the board; Martin E. Chapas and Joe Mireless have filled Crites' position and the vacant position.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

notification of board meetings on a bulletin board outside the district's central office and electronically on the district's website. In addition, the board addresses personnel matters and other confidential topics in closed sessions as needed.

Kingsville ISD posts live video of board meetings on a social media video website and maintains an archive of board meeting minutes dating to April 2020. The superintendent's secretary takes the minutes of board meetings and distributes them by email to Kingsville ISD board members for approval at the next board meeting.

Dr. Cecilia Reynolds-Perez has been the Kingsville ISD superintendent since August 2020. The superintendent reports directly to the board, and 10 staff report directly to the superintendent. **Figure 1–3** shows Kingsville ISD's organization at the time of the review team's onsite visit.

FIGURE 1–3
KINGSVILLE ISD ORGANIZATION
SCHOOL YEAR 2021–22

Board of Trustees

Superintendent

Assistant Superintendent of Curriculum and Instruction

Special Education Director

Director of Fine Arts

Human Resources (HR) Director

Executive Director of School Improvement

Chief Financial Officer

Food Service Director

Athletics Director

Director of Technology and Communication

Superintendent's Secretary

Food Service Department Staff – 27

Technology Department Staff – 10

Lead Diagnostician

Lead Speech Language Pathologist

HR Department Staff – 3

Nurses – 5

Lead Behavior Specialist

Counselor

Custodial Staff – 16

Finance Department Staff – 7

Transportation Department Staff – 25

Art Teacher

Choir Director

Mariachi Director

Maintenance Department Staff – 12

Theater Arts Teacher

Band Director

Drill Team Sponsor

Secretary

Secretary

Director of Elementary Instruction

Assessment Coordinator

Pogue Options Alternative Academy (DAEP) Administrator

School Resource Officers – 2

Director of Secondary Instruction

Campus Principals – 5

CTE Director

Parent Liaisons – 2

Public Relations/Parent and Community Outreach Coordinator

NOTE: CTE=career and technical education; DAEP=disciplinary alternative education program.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

The executive director of school improvement, the director of technology and communication, and the superintendent oversee Kingsville ISD's parental and community involvement functions. The district communicates with parents and the community at both the district and campus levels. The superintendent regularly sends automated phone calls to inform parents of district events, and principals send automated calls to inform parents of campus-level activities. The district also posts information for parents and the community on its social media accounts and district webpage, which are administered by the director of technology and communication. At the time of the LBB's review, the district sought to fill a vacant public relations position that is responsible for posting information to social media, updating the district's webpage, and coordinating communication with parents. The secretary to the executive director of school improvement responded to 60 open records requests received by the district during school year 2020–21.

Every campus is assigned either a parent liaison or a Communities in Schools representative. Parent liaisons are district staff that serve as the first point of contact with parents. Parent liaisons strive to identify students' needs and provide them sufficient support to succeed inside and outside the classroom, either by delivering direct services or through referrals to community partners. Liaisons provide information for parents and assist with matters concerning attendance and home visits, campus events for parents, on-campus food drives and clothing donations. The district's two parent liaisons are assigned to Harvey Elementary and Perez Elementary schools.

Communities in Schools (CIS) is a national nonprofit organization that provides academic and nonacademic support to help students reach their full potential. Its representatives are not district staff but perform similar functions to the district's parent liaisons. CIS representatives identify students that may need additional support and provide individual counseling, support groups, basic life skills, tutoring, mentoring, and enrichment opportunities based on each student's needs. CIS representatives are assigned to the Harrel Elementary School, Gillett Middle School, and King Early College High School campuses.

The district utilizes a parental involvement curriculum to determine a set of topics to discuss with parents monthly. Topics include bullying prevention, helping students with homework, and navigating the transition from childhood to adolescence. Parent liaisons are trained in these topics and conduct presentations to parents at their assigned campuses. The district makes these presentations available to all parents.

Campuses also coordinate and hold campus events throughout the year, which include open houses, movie nights, college application nights, literature nights, holiday events, and parent lunches. The district's oversight process for all parent and community volunteers includes background checks and tracking volunteer hours. However, the COVID-19 pandemic has limited volunteer activities during the past three school years. At the time of the onsite visit, the district reported enrolling 56 volunteers from school years 2019–20 to 2021–22.

Staff reported that the pandemic has made it difficult for the district to maintain parent-teacher organizations (PTO) during the past three school years. According to staff, the PTOs at Harvey Elementary and Perez Elementary are not very active and have held only a few virtual meetings since the beginning of school year 2020–21. Harrel Elementary School Gillett Middle School, and King Early College High School, did not have PTOs at the time of the visit

Kingsville ISD also maintains an educational foundation that works to provide funds for innovative and creative educational programs and activities that are not funded by the normal operating budget. Since its establishment in 2013, the foundation has awarded grants to teacher-led innovative projects and provided funds for student scholarships, student attendance at conferences, and textbook purchases. The foundation holds fundraisers throughout the school year, including a homecoming tailgate and golf tournament. As of May 2022, Kingsville ISD's Educational Foundation had a fund balance of $40,321, and the foundation awarded approximately $3,339 in teacher grants and $10,000 in student scholarships during school year 2021–22.

DETAILED FINDINGS

BOARD TRAINING (REC. 1)

Kingsville ISD board members lack a clear understanding of their roles and responsibilities.

Effective governance of local school districts depends on well-trained board members. Effective school boards focus on the oversight of management, policy making, planning, and evaluation, leaving the implementation of board policy and daily administration of the district to the superintendent.

Staff reported that school board members in previous school years have overstepped their oversight and policymaking roles, which led to frustration among staff and inefficiencies

in district operations. Staff reported that the current board intercedes less in operational administration but acknowledged this practice still needs improvement. For example, staff said that some board members focus more during board meetings on providing input into the district's daily operations than developing policy or providing general oversight. Staff also said that some board members encourage staff and community representatives to contact them directly with issues or complaints instead of following the established contact process through district staff.

In the review team's survey of campus staff, 42.3 percent of respondents agreed with the statement "school board members understand their role as policy makers and stay out of the day-to-day management of the district." Similarly, all six board members interviewed expressed the opinion that some or all board members did not understand their roles and responsibilities.

Ineffective training may contribute to board members' lack of understanding of their responsibilities. Provisions in Texas law govern the initial training and continuing education of school board members regarding their roles and responsibilities. Continuing education requirements for school board trustees developed by the State Board of Education appear in the Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter A, Section 61.1. In addition, the Texas Government Code prescribes school board member training in sections 551.005 for open meetings, 552.012 for open records, and 2054.5191 for cybersecurity.

Figure 1–4 shows an overview of continuing education requirements for Kingsville ISD school board members pursuant to state law and a summary of how many continuing education hours each member completed from January 2018 to September 2021.

As shown in **Figure 1–4**, board training records show that Kingsville ISD board members have not completed many of the required trainings. For example, three members have not received training for local district orientation or orientation to the Texas Education Code. The records indicate that no board member has received the required trainings on addressing sexual abuse, human trafficking, and other maltreatment of children. Training records also show that no board member has received training on legislative updates since 2017. Additionally, the records indicate that only one board member has received training on cybersecurity.

However, the district's training records may not accurately represent the trainings attended by board members because the district lacks an effective process for tracking board member training hours. After completing trainings, board members are required to enter their own training hours into the Texas Association of School Boards (TASB) training database. The superintendent's secretary updates board members on their training status periodically during the school year based on information in the TASB database, but the district does not have a local process for tracking training hours.

Some board members reported in interviews that they were confused regarding how to enter trainings into the database, and it is possible that some board members have attended more trainings than are being recorded. For example, all the board members elected in 2020 reported that they attended a local orientation session once in office, even though this training is not represented in the records. Staff reported the orientation occurred during a training session with the entire board, but board members may have recorded the orientation as team building in the TASB database. Without district staff independently tracking board training hours, it is difficult to confirm which trainings board members have attended.

Kingsville ISD also does not maintain a formal training calendar for board members, nor does it have a formal process to compare board training hours to statutory requirements. During onsite interviews, some board members reported being unaware of the training requirements found in board policy or state law. Additionally, Kingsville ISD's Board Policy BBD (LOCAL) requires the board president to announce the status of each member's continuing education credits annually at the last regular meeting before the district's May election date. The policy also requires that the announcement appears in board minutes and on the district's website. However, during onsite interviews, some board members said that they recalled no training announcements at any board meetings during their tenure on the board.

Without consistent continuing education, board members may lack the knowledge and information needed to make the best decisions for the district. The board also may not receive the latest information about industry best practices or legislative updates that affect school districts. This lack of continuing education could hinder board members' understanding of their roles and responsibilities and impair their ability to oversee district operations effectively.

FIGURE 1–4
KINGSVILLE ISD BOARD OF TRUSTEES CONTINUING EDUCATION HOURS
JANUARY 2018 TO SEPTEMBER 2021

REQUIRED TRAINING (1)	REQUIREMENTS	BOARD MEMBER A (2)	BOARD MEMBER B	BOARD MEMBER C	BOARD MEMBER D	BOARD MEMBER E	BOARD MEMBER F
Local district orientation	3.0 hours within the first 120 days in office	3.0 hours	3.0 hours	**0.0 hours**	**0.0 hours**	**0.0 hours**	3.0 hours
Orientation to the Texas Education Code	3.0 hours within the first 120 days in office	3.0 hours	**0.0 hours**	**0.0 hours**	**0.0 hours**	**0.0 hours**	3.0 hours
Update to the Texas Education Code	Following each legislative session; training must be of sufficient length to address major changes	Last training in 2017	Last training in 2017	**0.0 hours**	**0.0 hours**	**0.0 hours**	**0.0 hours**
Team building	3.0 hours in the first year in office and 3.0 every subsequent year	3.0 hours first year and 12.0 hours in 2021	3.0 hours first year and 12.0 hours in 2021	12.0 hours in 2021	12.0 hours in 2021	12.0 hours in 2021	12.0 hours in 2021
Additional continuing education, based on the district's framework for school board development	10.0 hours first year in office and 5.0 hours every subsequent year	**No training in 2020 and 2.0 hours in 2021**	Met every year in office	Met every year in office	Met every year in office	Met every year in office	Met every year in office
Evaluating and improving student outcomes	3.0 hours within the first 120 days in office and 3.0 hours every two years after the first year	3.0 hours in 2021	5.0 hours in 2021	5.0 hours in 2021	5.0 hours in 2021	5.0 hours in 2021	5.0 hours in 2021
Education addressing sexual abuse, human trafficking, and other maltreatment of children	1.0 hour within the first 120 days in office and 1.0 hours every two years after the first year	**0.0 hours**	**0.0 hours**	**0.0 hours**	**0.0 hours**	**0.0 hours**	**0.0 hours**
The Texas Open Meetings Act	1.0 hour within the first 90 days in office	1.0 hour	1.0 hour	1.0 hour	**0.0 hours**	1.0 hour	**0.0 hours**
The Texas Public Information Act	1.0 hour within the first 90 days in office	1.0 hour	1.0 hour	**0.0 hours**	**0.0 hours**	**0.0 hours**	**0.0 hours**
Cybersecurity	Required to attend a training every year in office, but the hours vary by provider	**0.0 hours**	**0.0 hours**	**0.0 hours**	**0.0 hours**	**0.0 hours**	1.0 hour in 2021

NOTES:
(1)   Reported hours that do not meet statutory requirements are shown in bolded text.
(2)   Board members are identified by letters for anonymity.
SOURCES: Legislative Budget Board School Performance Review Team, Kingsville ISD, March 2022; Board Training Records, January 2013 to September 2021.

Kingsville ISD should modify the school board's continuing education training process to ensure that board members receive all required trainings.

To achieve this outcome, the district should complete the following tasks:

- the superintendent's secretary should develop an annual board training calendar identifying governance-related training topics and specific dates that board members may attend trainings;

- the district should require board members to report completed trainings to the superintendent's secretary. The superintendent's secretary should maintain a list of all completed trainings for board members;

- the district should contact TASB to provide support or training to board members regarding how to record information in TASB's training database to represent attended trainings accurately. The superintendent's secretary should periodically check the TASB training

records against her own list to ensure that training data is being input correctly;

- the superintendent's secretary should remain informed about statutorily required trainings that board members must complete and update board members quarterly regarding the status of their training hours;

- the board president should announce all members' board training hours during the annual April board meeting, as specified in district policy; and

- the superintendent's secretary should survey board members annually to determine their training preferences and use the results to build the board's training calendar for the subsequent year.

The district could implement this recommendation within existing resources.

BOARD OPERATING PROCEDURES (REC. 2)

Kingsville ISD board members lack an understanding of various board operations, which inhibits effective stewardship of the district.

Pursuant to the Texas Administrative Code, Title 19, Section 61.1 (b)(1)(B), new board members are required to receive a local orientation within 120 days of taking office. The purpose of this orientation is to familiarize the new members with local district policies, procedures, and goals.

According to board members, Kingsville ISD conducts a local orientation for new board members, but it does not always include a comprehensive overview of all board operations. Board members reported that components of the orientation included an introduction to the other board members, a description of the role of a board member, and a summary of the major issues facing the district. Board members reported gaining much of their knowledge of how the board operates through discussions with other board members and observing what occurs at board meetings.

Kingsville ISD has a written board operating procedures manual intended to guide and assist the board in conducting business. However, not all board members reported being familiar with this resource, and it was unclear how the district makes it available to members. The district does not have a training process to inform new members or periodically remind existing members about the board's operating procedures. The board also does not regularly update its

operating procedures to keep them aligned with board policy. At the time of the review team's onsite visit, the district's board operating procedures state they last were updated in calendar year 2012.

The lack of training on board operating procedures has contributed to uncertainty and confusion reported by board members on several key aspects of board activities, including procedures for the following processes:

- how board vacancies are filled;

- the board's role in policy development;

- how board officers are elected;

- the board's role in the grievance process; and

- how to place items on a board meeting agenda.

Some board members and district administrators report that confusion about board processes has resulted in an atmosphere of mistrust and frustration. For example, some board members report that the process for placing an item on the board meeting agenda is unclear and inconsistent, leading some to believe that the board president and the superintendent deliberately exclude certain requested agenda items. This perceived inconsistency may stem from the conflicting information board members receive from the district regarding the agenda process.

Board Policy BE (LOCAL) states that the superintendent shall prepare the agenda for all board meetings, and that any board member may request that a subject is included on the agenda. It also states that the superintendent shall include on the preliminary agenda all topics that have been submitted by members in a timely manner. In contrast, the board operating procedures state that an item is placed on the agenda only if it is requested by at least two board members.

Some board members report uncertainty regarding whether the board president has the authority to exclude requested agenda items due to the inconsistencies between information in board policy and the board operating procedures manual. Both board policy and the board operating procedures state that the superintendent should consult with the board president to ensure the agenda includes all topics requested by board members, and neither guideline authorizes the board president alone to remove a requested subject from the agenda. Due to the lack of a clear, consistent agenda process in policy and procedures, board members whose requested items are not placed on the agenda report feeling marginalized.

Similarly, board members reported uncertainty related to the process for selecting board officers. All board members acknowledged that board officers are selected every two years after the board member election, pursuant to board operating procedures and Board Policy BDAA (LEGAL). However, individual board members' understanding of the process for nominating officers varied in interviews with the review team. Some members reported that officers could be self-nominated, others reported that officers must be nominated by another board member, and some reported that officer nominations must be made and seconded by two separate members. Additionally, some board members reported being unsure whether they could turn down an officer nomination made by another board member. The board's operating procedures and policies are vague regarding the process for selecting board officers, which has led some board members to express frustration with board leadership and others to report feeling obligated to hold officer positions that they did not want.

Understanding board operating procedures is essential for board members to carry out their responsibilities effectively. Confusion regarding how the board should operate can result in dissention and mistrust among board members and district staff. Although the review team did not find evidence that frustration among current members has led to dysfunction in board operations, interviews with members suggest that friction and factionalism among members of previous boards led to disagreements that once resulted in a physical altercation. It is important that Kingsville ISD's board follows a process to inform members of proper board practices that align with board policy. This education would help ensure that relations among board members remain professional and that the board operates in the best interests of the district and its students.

Kingsville ISD should establish a process to review and update board operating procedures annually.

The district should review and revise board operating procedures to align them with board policy, which includes listing board policies related to board operations in the board operating procedures. The board also should assess whether the operating procedures and board policy are specific enough to guide various aspects of board operations. The board should update its local board policy and its board operating procedures to provide more information for processes that are not detailed sufficiently. For example, the board should update Board Policy BDAA (LOCAL) to specify how board officers are nominated. After these updates are completed, the district should review and update its board operating procedures annually.

Kingsville ISD's board also should conduct brief overviews of various board operations throughout the school year. These overviews will serve to refresh board members' knowledge of current procedures and as an assessment of whether those procedures align with the district's current needs.

Additionally, the district should ensure that all new board members receive copies of the board operating procedures during their local orientation. Board member orientation should include an overview of the key functions of the board as outlined in the operating procedures.

Kingsville ISD's board and superintendent also should consider enrolling in the Texas Education Agency's (TEA) Lonestar Governance Program (LSG), which is a training initiative that provides coaching and support through a continuous-improvement framework for school governance entities to focus on student success. LSG aligns board members' conduct with research-based behaviors and provides a system for assisting board members in improving their governing and fiscal responsibilities. After an initial two-day training, TEA assigns an LSG coach to assist the superintendent and board. The coach will continue to provide regular support to the district if requested by the board. The cost of the LSG is estimated at $400 per person.

The district could implement this recommendation within existing resources.

DISTRICT ORGANIZATION (REC. 3)

Kingsville ISD does not have an effective and efficient organization relative to the superintendent's supervisory responsibilities.

The role of a superintendent is broad and extensive. The superintendent is responsible for managing daily operations, preparing and administering the district's budget, organizing the district's central administration, and keeping the district focused on its primary mission—student academic achievement and progress. The superintendent performs many district functions, such as setting the district's vision and goals, collaborating with the board, engaging the community, managing finances, serving as an instructional leader, and delegating daily activities that accomplish instructional and operational requirements. Effective oversight of a school district requires a superintendent to manage his or her time and duties efficiently.

As shown in **Figure 1–3**, Kingsville ISD's superintendent directly supervises and evaluates 10 staff from six functional areas, including educational service delivery, food service management, financial management, human resources, community involvement, and information technology management. **Figure 1–5** shows the superintendent's supervisory responsibilities at Kingsville ISD compared to those of its peer districts. Peer districts are districts similar in size and other characteristics to Kingsville ISD that are used for comparison purposes during the review.

Although the number of staff a supervisor can manage effectively varies by organization, the Society for Human Resources Management identifies from six to eight directly reporting positions as the typical range for an executive's supervisory responsibilities. As shown in **Figure 1–5**, the number of positions reporting directly to Kingsville ISD's superintendent is greater than those of any peer districts or the number of positions identified in best practices.

During interviews, staff said the superintendent took on additional staff and responsibilities to improve the district's academic performance. Prior to the tenure of the current superintendent, the district received an academic accountability rating of F from TEA and an overall score of 57 out of 100 in school year 2017–18. The district was not rated in school year 2018–19 due to data integrity issues, and TEA did not issue accountability ratings in school years 2019–20 and 2020–21 during the onset of the COVID-19 pandemic. The district received individual campus accountability grades for school year 2018–19, as shown in **Figure 1–6**. These scores were the most recent accountability data available at the time of the review team's onsite visit.

To improve academic performance, the superintendent narrowed the focus of the Curriculum and Instruction Department to curriculum management and student improvement. In doing so, the superintendent assumed some of that department's responsibilities, including direct supervisory oversight of the director of fine arts and the special education director, and assigned some responsibilities to other departments. For example, the executive director for school improvement was tasked with overseeing programs for early college, dual credit, and career and technical education (CTE), and the disciplinary alternative education program (DAEP). Oversight of the district's custodians and nurses was reassigned to the Human Resources Department. The district also placed the Transportation Department and the Maintenance Department under the supervision of the

FIGURE 1–5
POSITIONS REPORTING TO THE SUPERINTENDENT AT KINGSVILLE ISD COMPARED TO PEER DISTRICTS SCHOOL YEAR 2021–22

DISTRICT	STUDENT ENROLLMENT	REPORTING POSITIONS
Kingsville ISD	**2,805**	**10**
Alice ISD	4,369	3
Robstown ISD	2,480	8
West Oso ISD	1,969	8

SOURCES: Legislative Budget Board School Performance Review Team, March 2022; Texas Education Agency, Public Education Information Management System Student Enrollment Report, School Year 2021–22.

FIGURE 1–6
KINGSVILLE ISD CAMPUS ACCOUNTABILITY RATINGS SCHOOL YEAR 2018–19 (1)

CAMPUS NAME	ACCOUNTABILITY RATING (2)
Harrel Elementary School	F
Harvey Elementary School	D
Kleberg Elementary School (3)	F
Perez Elementary School	A
Gillett Middle School	D
Memorial Middle School (3)	C
King Early College High School	Not Rated due to data integrity issues

NOTES:
(1) As of March 2022, school year 2018–19 was the most recent accountability data available. The Texas Education Agency (TEA) did not issue ratings for Texas school districts for school years 2019–20 and 2020–21 due to the COVID-19 pandemic.
(2) TEA rates campuses on a scale of A to F.
(3) The district closed Kleberg Elementary and Memorial Middle School after school year 2020–21.
SOURCE: Texas Education Agency, Accountability Ratings, School Year 2018–19.

chief financial officer (CFO). **Figure 1–3** shows the current functional assignments in the district.

Although the district may have implemented its current administrative structure to focus on improving student performance, it also has resulted in inefficiencies. As shown in **Figure 1–3**, Kingsville ISD's organization places the district's operational areas (Food Service, Transportation, Maintenance, and Custodial Services) under the supervision of three administrators (CFO, superintendent, and human resources (HR) director). In interviews, staff reported that none of the three administrators have experience overseeing these areas. This structure requires

the CFO and HR director to commit significant time overseeing areas that are not related to their primary functions, which limits the time they have available to oversee the financial management of the district and the district's HR functions.

An effective distribution of duties enables the superintendent to focus on critical strategic initiatives that contribute to the district's overall success. However, the Kingsville ISD superintendent's daily responsibilities and duties related to managing staff may diminish the time available for executing other essential job duties, such as district oversight, district planning, and district goal setting. By assigning the superintendent numerous responsibilities, the district's performance depends overwhelmingly on the leadership and guidance of one individual. During interviews, staff expressed strong support for the superintendent's management of the district. However, Kingsville ISD's current organization places the district at risk of long-term inefficiency and dysfunction if the superintendent leaves her position. Additionally, assigning the district's operational functions to supervisors who are not experienced or knowledgeable in these areas could lead to ineffective operations.

Kingsville ISD should modify the district's organization to decrease the superintendent's supervisory responsibilities and reorganize the educational and operational functions of the district.

One option for achieving this recommendation is to change the executive director of school improvement position to an assistant superintendent of operations position and reassign some of the director's current responsibilities to existing staff. The new assistant superintendent of operations position would be responsible for overseeing the food service, maintenance, transportation, and custodial services departments. As a result, these departments no longer would report directly to the superintendent, CFO, or HR director.

The educational areas formerly overseen by the executive director of school improvement, such as CTE and DAEP, could be assigned to the assistant superintendent of curriculum and instruction. The fine arts program and nurses also could be supervised by the assistant superintendent of curriculum and instruction instead of the superintendent and HR director. The assistant superintendent of operations would retain some duties currently assigned to the executive director of school improvement, such as public relations,

parent and community outreach, parent liaisons, and school resource officers.

Figure 1–7 shows the Kingsville ISD administrative structure if the district follows this recommendation.

This reorganization of the district would reduce the superintendent's directly reporting positions to eight, which would align with best practices and the management responsibilities of superintendents at peer districts. Additionally, this reorganization would lessen the administrative responsibilities of the CFO and HR director, who no longer would be required to oversee areas of which they have limited knowledge and experience.
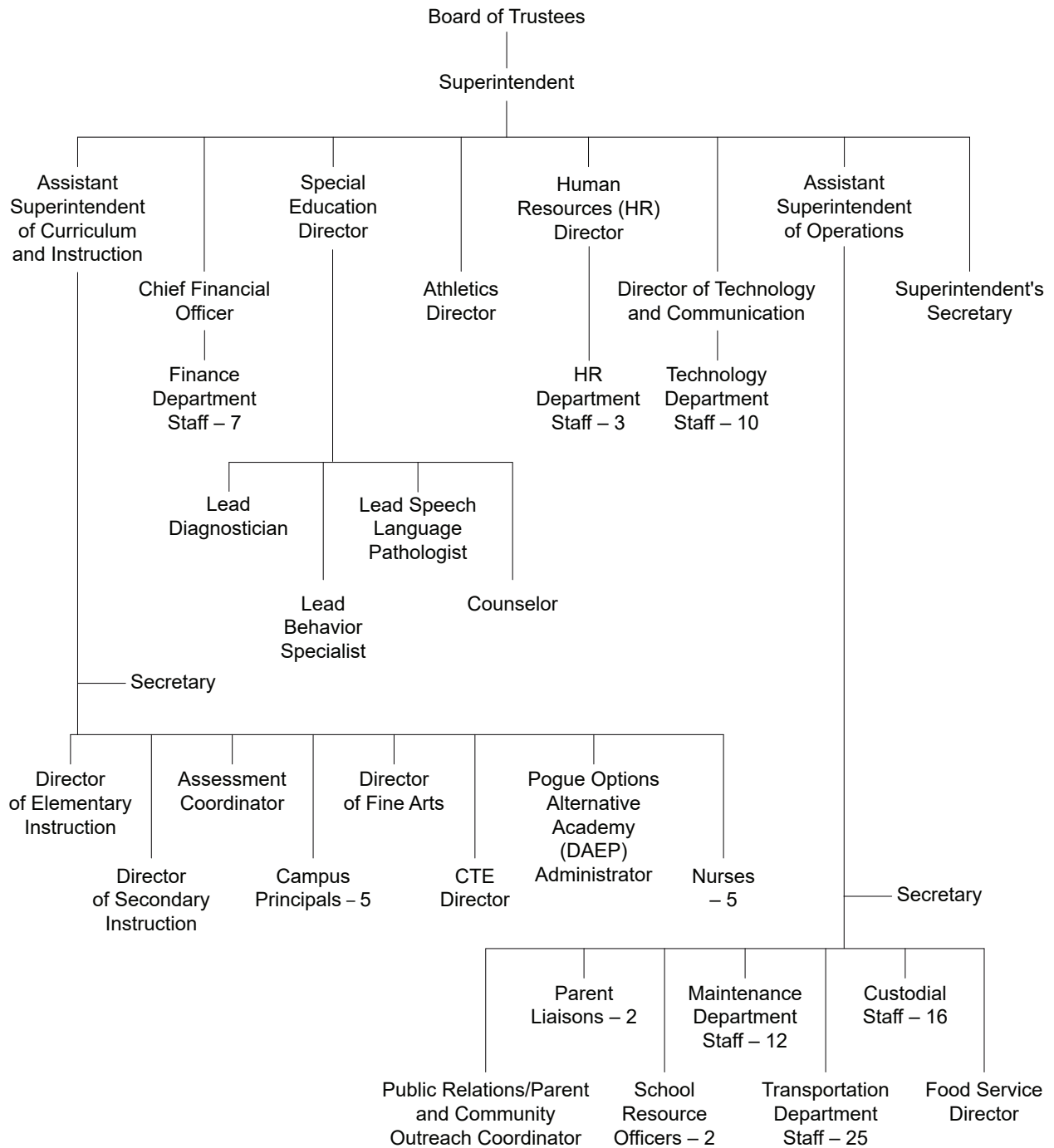
It is also recommended that the Special Education Department remain separate from the Curriculum and Instruction Department following any reorganization of the district. In determining that the district's special education program needed substantial intervention, TEA required Kingsville ISD's Special Education Program to develop a State Performance Plan in 2020. The district hired a new special education director and is working to improve special education services. However, the superintendent should continue to monitor the department closely and directly supervise the special education director.

Although the district may be unable to reorganize its structure immediately as recommended, it should aim to complete this reorganization by school year 2024–25.

Since the review team's onsite visit, Kingsville ISD staff reported that they have restructured the district's organization for school year 2022–23. Staff stated that the new organizational structure reduced the superintendent's directly reporting positions from 10 to nine, established a new position for assistant superintendent of support programs, and shifted some supervisory responsibilities to other positions.

The fiscal impact assumes an annual estimated net cost of $24,627 to change the executive director of school improvement position to an assistant superintendent of operations position. This amount is based on the cost difference between the current salary and benefits of the executive director of school improvement ($119,614=$99,678 salary + $19,936 benefits) and the estimated salary and benefits of the new assistant superintendent of operations ($144,241=$120,201 salary + $24,040 benefits). The estimated salary of the assistant superintendent of operations is calculated using the salary of the district's assistant

FIGURE 1–7
KINGSVILLE ISD RECOMMENDED ORGANIZATION
MARCH 2022

Board of Trustees

Superintendent

Assistant Superintendent of Curriculum and Instruction

Special Education Director

Human Resources (HR) Director

Assistant Superintendent of Operations

Chief Financial Officer

Athletics Director

Director of Technology and Communication

Superintendent's Secretary

Finance Department Staff – 7

HR Department Staff – 3

Technology Department Staff – 10

Lead Diagnostician

Lead Speech Language Pathologist

Lead Behavior Specialist

Counselor

Secretary

Director of Elementary Instruction

Assessment Coordinator

Director of Fine Arts

Pogue Options Alternative Academy (DAEP) Administrator

Director of Secondary Instruction

Campus Principals – 5

CTE Director

Nurses – 5

Secretary

Parent Liaisons – 2

Maintenance Department Staff – 12

Custodial Staff – 16

Public Relations/Parent and Community Outreach Coordinator

School Resource Officers – 2

Transportation Department Staff – 25

Food Service Director

NOTE: CTE=career and technical education; DAEP=disciplinary alternative education program.
SOURCE: Legislative Budget Board School Performance Review Team, Kingsville ISD, March 2022.

superintendent of curriculum and instruction as a baseline, and all benefits are calculated at 20.0 percent of salary.

DISTRICT AND CAMPUS IMPROVEMENT PLANS (REC. 4)

Kingsville ISD lacks an effective process to develop and administer its district and campus improvement plans.

Statute requires districts to develop campus improvement plans (CIP) and a district improvement plan (DIP). The Texas Education Code, Section 11.252(a), requires that every school district annually develops, evaluates, and revises a DIP. The purpose of the DIP is to guide school district staff in the improvement of student performance. The DIP establishes a set of measurable annual goals, objectives, and strategies used to monitor student performance. The Texas Education Code requires a DIP to include the following provisions:

- comprehensive needs assessment addressing the district's student performance on achievement indicators and other appropriate measures of performance;

- measurable performance objectives for all appropriate achievement measures for all student populations in the district, including students in special education programs, and other measures of student performance that may be identified through the comprehensive needs assessment;

- strategies for achieving the performance objectives;

- resources needed to implement identified strategies;

- staff responsible for ensuring the accomplishment of each strategy;

- timelines for ongoing monitoring of the implementation of each improvement strategy;

- formative evaluation criteria for determining periodically whether strategies are resulting in intended improvement of performance;

- the district's policy addressing sexual abuse and other maltreatment of children; and

- a trauma-informed care policy.

Similarly, the Texas Education Code, Section 11.253, requires that every school district annually develop a CIP for all campuses. CIPs follow the same structure as the DIP but are campus-based plans that establish educational objectives

and specify how resources and time will be allocated during the school year to meet the determined objectives.

To guide the development of these plans, Kingsville ISD established the following board policies to align district practice with statute:

- Board Policy BQ (LEGAL), regarding the overall planning and decision-making process;

- Board Policy BQA (LEGAL), regarding planning and decision making at the district level; and

- Board Policy BQB (LEGAL), regarding planning and decision making at the campus level.

Board Policy BQB (LEGAL) requires the district to establish site-based decision-making (SBDM) committees for each campus to assist in developing and evaluating the CIPs. Each committee must include Kingsville ISD staff, business and community representatives, and parents, and teachers must constitute at least two-thirds of district staff on each committee. The policy also describes other required activities for the committees, such as establishing a meeting schedule, communicating with and disseminating information to district stakeholders, consulting with the superintendent, reviewing dropout data, and assessing the effectiveness of the local dropout prevention program.

Kingsville ISD's process for developing the school year DIP consists of the following steps:

- the district needs assessment is administered to all staff each spring;

- key stakeholders in the district, including directors and department heads, meet to develop goals for the DIP;

- the DIP is shared with the district's District Education Improvement Committee (DEIC), which consists of teachers, parents, business leaders, the CFO, director of technology and communication, and two principals. The executive director of school improvement oversees the DEIC, which reviews the draft of the DIP and provides feedback; and

- the final DIP is submitted to the board for approval at the January board meeting.

Kingsville ISD's official process for developing CIPs is similar to the DIP process. Each campus conducts a campus needs assessment and establishes a CIP committee. Based on the

results of the district needs assessment and available state academic data, each CIP committee develops goals and performance objectives with campus-specific strategies. Each campus principal also reviews the DIP to establish overall alignment among the plans.

However, Kingsville ISD's process for developing and monitoring the annual DIP and CIPs is inefficient and inconsistent among campuses, and it does not comply with board policy.

For example, the district has a recent history of failing to implement campus and district improvement plans until several months into the school year. According to staff, the district did not develop district or campus improvement plans for school years 2018–19 or 2019–20. Since the district hired the current superintendent in calendar year 2020, staff have been working to accelerate the submission and approval process for the plans; however, the district was unable to submit the DIP and CIPs for school years 2020–21 and 2021–22 for board approval earlier than February 2021 and January 2022, respectively. To further improve the timeliness of improvement plan submissions, the current administration has established a new process for developing the DIP and CIPs with the assistance of a consultant.

In addition, it is unclear how often the district updates the board on its progress toward meeting DIP goals. The superintendent reported that she presents updates periodically at board meetings on how the district is meeting its DIP goals. However, during interviews, staff said that monitoring the DIP has not been established as a district priority. Most campus and district administrators reported being uncertain as to whether the district had accomplished the goals specified in the school year 2020–21 DIP. Most board members also reported not knowing whether the district met its goals for the school year 2020–21 DIP, and several could not recall receiving updates on the DIP after it is approved, despite evidence from staff and board minutes that indicates the board did receive updates.

Similarly, Kingsville ISD does not have a consistent process for monitoring CIPs at each campus. During interviews, some campus administrators described a regular, structured process for monitoring and assessing the CIP, while others reporting monitoring the CIP goals on an ad hoc basis.

Some campuses also do not comply with board policy related to campus-level committees. District and campus staff reported that some campus-level committees that help to develop the CIPs do not meet the requirements in statute

or board policy to qualify as SBDM committees. For example, these committees do not meet regularly or perform any functions outside of developing the CIPs. Additionally, none of the campus-level committees reported including community representatives or parents, and no administrator could confirm that two-thirds of the staff members on each committee are teachers as required by statute and board policy.

Failure to establish an SBDM committee at each campus level is a violation of statute and board policy. Lack of involvement by stakeholders in the campus improvement processes impedes progress, and failure to implement statute and policy could lead to intervention from The Texas Education Agency.

Effectively implementing and monitoring the DIP and CIPs is particularly important for Kingsville ISD, because of the district's poor academic accountability ratings. As shown in **Figure 1–6**, the district received academic accountability ratings of D or F on the state's A-to-F scale for five of the six campuses that received ratings for school year 2018–19.

The DIP and CIPs are the only board-approved academic goals established for the district and each campus. Failure to monitor these plans consistently may deprive the district and campuses of updates on academic progress, which may hinder overall student academic improvement.

TEA and regional Education Service Center II (Region 2) can assist districts in developing district and campus goals and monitoring progress. TEA's Financial Accountability Systems Resource Guide has a module that districts can follow for implementing SBDM committees. Region 2 offers similar materials and provides direct technical assistance to districts.

Kingsville ISD should establish procedures to coordinate the development and implementation of district and campus improvement plans that include a defined calendar for implementation; SBDM committees; and required progress reporting.

The superintendent should coordinate with the board to establish a formal timeline for the planning processes of the DIP and the CIPs. This timeline should require that the DIP and CIPs be completed and submitted to the board no later than the August board meeting, and this timeline should be incorporated into board policy and used to guide the development of the plans.

Along with the existing CIP committees, the assistant superintendent of curriculum and instruction should require that each campus form a SBDM committee aligned with board policies to direct and support efforts designed to meet district and campus goals. The assistant superintendent of curriculum and instruction should ensure that the DIP committee meets SBDM requirements and require that each campus principal submit SBDM committee membership rolls. The superintendent also should require that the membership of each campus SBDM committee comply with statute and board policy. Additionally, the district should define roles and responsibilities for all responsible parties in the SBDM process. The superintendent should inform the board as soon as these committees have been formed in accordance with board policy.

The district also should develop a schedule of meetings designed specifically to monitor the progress of the district's goals. The assistant superintendent of curriculum and instruction, director of elementary instruction, director of secondary instruction, special education director, CFO, campus administrators, and the district's DEIC committee should meet quarterly to discuss DIP progress. The superintendent and board should designate agenda items at every third board meeting to monitor the district's progress toward DIP and CIP goals.

Additionally, the assistant superintendent of curriculum and instruction should collaborate with campus administrators and the CFO to establish a process for assessing and reporting DIP and CIP progress quarterly.

The district could implement this recommendation with existing resources.

STRATEGIC PLANNING (REC. 5)

Kingsville ISD lacks a comprehensive, multiyear strategic-planning process that sets measurable goals, addresses the district's long-term needs, and directs the use of district resources.

For school year 2021–22, Kingsville ISD developed six improvement plans, including the DIP and one CIP for each of the five campuses. Although the district has processes for developing required district and campus improvement plans, it has no process for producing a long-range strategic plan to guide the development of required annual district and campus plans.

Kingsville ISD's annual DIP is not structured to facilitate long-range planning. It is focused on instruction and sets goals for student achievement, professional development, and technology as they relate to the delivery of educational services. The DIP does not address transportation, food service, community involvement, asset and risk management, and other areas of district operations. As a result, the district lacks a single, comprehensive strategic plan that incorporates all planning in all these functions.

Without a comprehensive strategic plan ranging from three years to five years, the district may react to administrative, operational, and academic challenges annually rather than planning systematically for a longer period through a well-defined process. In addition, without an established and comprehensive strategic-planning process, the district cannot articulate its direction based on consensus of long-term needs, use of resources, or stakeholder goals.

Strategic plans improve the effectiveness of school districts in addressing unforeseen events, allocating budget and human resources to achieve goals, and establishing accountability standards. For example, effective long-range planning can help a school district manage the budgetary consequences of a decrease in its tax base due to economic downturn. Sound strategic plans encompass all aspects of district operations, including academic, operational, and financial goals. Each goal is tied to resource requirements, student achievement, implementation steps, timelines, action items, performance measures, and fund requirements. A strategic-planning process also can help build stakeholder support by engaging staff, parents, and community representatives in the planning process.

Figure 1–8 shows a best practice model of a strategic planning process.

Kingsville ISD should develop a comprehensive strategic plan ranging from three to five years, with measurable objectives to align all areas of district operations and serve as a framework for making district decisions.

The superintendent and the board should structure the strategic-planning process to address functional areas that are not included in the DIP, such as facilities, technology, risk management, and safety and security. All the district's strategic-planning efforts should include input from staff, community representatives, and other stakeholders.

To implement this recommendation, Kingsville ISD should perform the following tasks:

- establish a district team that includes the superintendent, department heads, campus

FIGURE 1–8
STRATEGIC PLANNING BEST PRACTICE MODEL
2017

STEP	PURPOSE
Step 1: Vision Setting	The board, superintendent, and key stakeholders engage in a vision-setting process to determine characteristics the district should have if it operated at the optimal level.
Step 2: Mission and Goals	The board, superintendent, and key stakeholders identify a mission with associated goals that, when accomplished, will bring the district closer to realizing its vision.
Step 3: Setting Priorities	The board prioritizes the district's most important goals to serve as the basis of the strategic plan.
Step 4: Identifying Barriers	The board, superintendent, and leadership team assess data to identify the major barriers to accomplishing the goals.
Step 5: Identifying Resources	The administration connects the budgeting process to the planning process to ensure that district goals and priorities guide budget allocation.
Step 6: Strategy	The superintendent, administration, and key stakeholders, including parents, business leaders, civic organizations, and community groups, develop strategies to accomplish the goals by addressing the identified barriers, developing timelines for completion, assigning accountability, identifying performance measures, and allocating resources.
Step 7: Consensus Building	The board, superintendent, and stakeholders build consensus, review the plan for viability, and approve the final document.
Step 8: Implementation and Monitoring	Individuals or departments assigned with accountability implement the plan's strategies and monitor progress based on performance measures and use of allocated funds.
Step 9: Evaluation	The district evaluates the success of the plan and determines which performance measures were met, which goals were fulfilled, and which obstacles prevented success. The superintendent presents findings to the board.

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

principals, teachers, selected board members, business community representatives, and parents. The district team should be responsible for developing the strategic-planning process and completing the following tasks:

- identify and facilitate the logistics of the strategic-planning process and develop a timeline based on these factors;

- identify the overall direction, values, mission, vision, purpose, and goals for the plan; and

- develop objectives and strategies, identify resources, and establish metrics to measure the outcomes;

• post the draft strategic plan on the district website for public comment;

• submit the final plan to the full board for approval;

• incorporate components of the plan in the annual DIP and CIPs; and

• share highlights of the strategic plan with the business community and other organizations.

In developing this plan, the district team should supplement the goals with specific, measurable, long-term objectives for instructional and noninstructional areas. In addition, the strategic plan should identify the resources required to accomplish the goals, including funding sources. The district also should task staff with achieving the goals within an established timeline, which typically ranges from three years to five years.

To implement the plan, all principals and department heads should report their progress toward any goals that affect their campuses or departments twice a year to the superintendent. This progress report should include a meeting with the superintendent to discuss challenges and any additional support necessary to accomplish the plan's goals. Additionally, the assigned staff should report at least twice a year to the board regarding the progress of accomplishing each goal in the strategic plan.

Kingsville ISD also should consider holding an annual strategic-planning workshop for board members, the superintendent, and key stakeholders to discuss the progress of the strategic plan.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

BOARD CALENDAR

Kingsville ISD's board does not organize and plan its activities effectively. During interviews, board members expressed frustration about the lack of information they receive regarding dates and timelines associated with certain district activities, including the budget cycle, the development and approval of the DIP and CIPs, and benchmark testing. Board members depend on district staff to inform them when events occur, and they lack a board calendar or any mechanism to hold the district accountable for meeting deadlines. Board members also expressed concern that board meetings, workshops, and executive sessions sometimes are not scheduled and planned far enough in advance for board members to prepare for the topics being discussed. Some members reported that the board does not keep track of certain operations. For example, the board did not perform a scheduled six-month review of the superintendent's August 2021 evaluation.

Each July, Kingsville ISD should develop an annual board activity calendar for the upcoming school year. The calendar should contain dates for major district and campus events and for all required board activities, such as budget adoption, DIP and CIP adoption, the superintendent's evaluation, school board meetings and workshops, and board trainings. It also should include dates when the board will receive project reports. A board activity calendar would assist the district in the following tasks:

- streamlining monthly agenda planning;

- addressing all legally required actions at the appropriate time;

- allotting time for policy, planning, and evaluation in addition to routine and urgent issues;

- informing all board members regarding when specific items will be addressed;

- conveying the cycle of district business and the board's appropriate role to new trustees and the public; and

- tracking items that are deferred for future consideration.

The district should review *Developing an Annual Board Calendar Activity*, a TASB guide, which details how to develop and update the calendar. The document is available on TASB's website. Kingsville ISD also should review examples of board activity calendars from Gatesville ISD, River Road ISD, and Terlingua Common School District to use as a template for its own calendar.

VENDOR CONTRACTS

Board Policy CH (LOCAL) states that any district purchase of goods or services that costs $25,000 or more requires prior board approval. The district consistently has followed this requirement, but board members reported that purchasers often provide limited information when submitting purchases for approval. For example, these submissions do not include information regarding other bids the district considered related to the purchase. Board members expressed concern that without this information, they cannot always confirm that the purchases they approve are the most fiscally responsible for the district. No evidence shows that Kingsville ISD has made any purchases that are disadvantageous financially, but increased transparency in purchasing would promote the board's effective stewardship of the district's finances. District administration should consider collaborating with the board to establish standards for information that prospective purchasers must present to the board when seeking approval for a purchase. This information could include a summary of all the bids received for each purchase and the reasons the vendor was chosen.

PARENT LIAISONS

The district has two parent liaisons, who are staff in the School Improvement Department and are assigned to Harvey Elementary and Perez Elementary schools. Although the parent liaisons are supervised by the executive director of school improvement, they often are assigned duties by campus administrators that are outside the scope of their job descriptions, which include performing secretarial, lunch period, and after-school duties that are not related to parental and community involvement. Although this practice may be justified at times when campuses are short-staffed due to illness or staff separation from employment, the district should limit the extent to which parent liaisons are assigned these activities as part of their regular job functions. These additional duties prevent parent liaisons from focusing on parent and community involvement, which is a vital component of district and student success.

FISCAL IMPACT

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

The LBB's School Performance Review Team identified a fiscal impact for Recommendation 3.

RECOMMENDATION	2023–24	2024–25	2025–26	2026–27	2027–28	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT							
3. Modify the district's organization to decrease the superintendent's supervisory responsibilities and reorganize the educational and operational functions of the district.	$0	($24,627)	($24,627)	($24,627)	($24,627)	($98,508)	$0
Total	**$0**	**($24,627)**	**($24,627)**	**($24,627)**	**($24,627)**	**($98,508)**	**$0**

2. EDUCATIONAL SERVICE DELIVERY

ACCOMPLISHMENTS

- ♦ Kingsville ISD's comprehensive career and technical education program has a high enrollment rate.

- ♦ Kingsville ISD has implemented several processes to improve instruction for students.

FINDINGS

- ♦ Kingsville ISD lacks an effective program for gifted and talented students.

- ♦ Kingsville ISD's disciplinary alternative education program lacks a consistent transition process for exiting students and may not be meeting students' instructional needs.

- ♦ Kingsville ISD does not provide teachers consistent, adequate professional development support and instructional and technological resources to implement the newly adopted curriculum effectively.

- ♦ Kingsville ISD has not implemented districtwide procedures to deliver effective, consistent academic and behavior interventions for struggling students.

RECOMMENDATIONS

- ♦ **Recommendation 6: Develop and implement a comprehensive program for gifted and talented students to meet their instructional needs.**

- ♦ **Recommendation 7: Assess the district's disciplinary alternative education program transition process and instructional services.**

- ♦ **Recommendation 8: Provide administrators and teachers with necessary professional development opportunities and curricular resources consistently.**

- ♦ **Recommendation 9: Implement a multitiered system of supports process districtwide and regularly evaluate student intervention programs for effectiveness.**

BACKGROUND

An independent school district's educational service delivery function provides academic services to Texas students based on state standards and assessments. A school district should identify and support students' educational needs, provide

FIGURE 2–1
KINGSVILLE ISD CAMPUSES AND ENROLLMENT SCHOOL YEAR 2021–22

CAMPUS	GRADE LEVELS	ENROLLMENT
Harrel Elementary School	Prekindergarten to grade five	323
Harvey Elementary School	Prekindergarten to grade five	509
Perez Elementary School	Prekindergarten to grade five	454
Gillett Middle School	Grades six to eight	604
King Early College High School	Grades nine to 12	915
Pogue Options Alternative Academy	Grades six to 12	N/A (1)

NOTE: (1) Disciplinary alternative education programs do not report enrollment. For reporting purposes, students assigned to Pogue Options Alternative Academy use their locally assigned campus.
Source: Texas Education Agency, Public Education Information Management System Student Enrollment Report, school year 2021–22.

instruction, and measure academic performance. Educational service delivery must meet the needs of a variety of student groups and requires adherence to state and federal regulations related to standards, assessments, and program requirements.

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

Kingsville Independent School District (ISD) has six campuses that include three elementary schools, a middle school, a high school, and Pogue Options Alternative Academy, which houses the district's disciplinary alternative education program (DAEP). The district's enrollment for school year 2021–22 was 2,805 students. **Figure 2–1** shows enrollment at each Kingsville ISD campus and the grade levels each serves.

Figure 2–2 shows the demographics of Kingsville ISD students compared to state averages. For school year 2020–21, the student population was 85.7 percent Hispanic, 9.7 percent White, 3.3 percent African American, and less than 1.0 percent each Asian, American Indian, Pacific Islander, and two or more races. Approximately 82.0 percent of students were categorized as economically disadvantaged, greater than the state average of 60.3 percent. The district identified 3.4 percent of students as English learners (EL), which is less than the state average of 20.7 percent. Approximately 60.0 percent of students are designated as at risk of dropping out of school, which is greater than the state average of 49.2 percent.

Figure 2–3 shows Kingsville ISD's accountability ratings for school years 2016–17 to 2020–21. During these school years, the district's campuses also included Kleberg Elementary School and Memorial Middle School, both of which closed before the beginning of school year 2021–22.

FIGURE 2–2
KINGSVILLE ISD STUDENT DEMOGRAPHICS SCHOOL YEAR 2020–21

STUDENTS	DISTRICT	STATE
African American	**3.3%**	12.7%
Hispanic	**85.7%**	52.9%
White	**9.7%**	26.5%
American Indian	**0.1%**	0.3%
Asian	**0.9%**	4.7%
Pacific Islander	**0.1%**	0.2%
Two or more races	**0.2%**	2.7%
Economically disadvantaged	**82.0%**	60.3%
English learners	**3.4%**	20.7%
At risk	**60.0%**	49.2%

SOURCE: Texas Education Agency, Texas Academic Performance Report, Membership, school year 2020–21.

FIGURE 2–3
**KINGSVILLE ISD ACCOUNTABILITY RATINGS, SCHOOL YEARS 2016–17 TO 2021–22**

CAMPUS	2016–17	2017–18 (1)	2018–19	2019–20 (2)	2020–21 (2)	2021–22 (3)
Harrel Elementary School	Met Standard	Met Standard	F	Not Rated	Not Rated	C
Harvey Elementary School	Met Standard	Met Standard	D	Not Rated	Not Rated	C
Kleberg Elementary School	Met Standard	Improvement Required	F	Not Rated	Not Rated	N/A (7)
Perez Elementary School	Met Standard	Met Standard	A	Not Rated	Not Rated	Not Rated (3)
Gillett Intermediate School (4)	Met Standard	Improvement Required	D	Not Rated	Not Rated	C
Memorial Middle School	Met Standard	Met Standard	C	Not Rated	Not Rated	N/A (7)
King Early College High School	Met Standard	Improvement Required	Data Integrity Issues (5)	Not Rated	Not Rated	C
Pogue Options Alternative Academy	Met Alternative Standard	Met Alternative Standard	N/A (6)	N/A (6)	N/A (6)	N/A (6)
Districtwide	Met Standard	F	Data Integrity Issues (5)	Not Rated	Not Rated	C

NOTES:
(1) The Legislature phased in a new accountability rating system for Texas public schools beginning in school year 2017–18, during which school districts received alphabetical ratings. Campuses received alphabetical ratings beginning in school year 2018–19.
(2) Districts and campuses did not receive accountability ratings for school years 2019–20 and 2020–21 during the onset of the COVID-19 pandemic.
(3) School year 2021–22 data was released after the review team's onsite visit. Pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, the Texas Education agency assigned a Not Rated label for school year 2021–22 to districts and campuses with scores that earn a D or F rating.
(4) Gillett Intermediate School was the predecessor to Gillett Middle School and served grades five and six.
(5) Not rated for data integrity issues indicates data accuracy or integrity have compromised performance results, making it impossible to assign a rating.
(6) Pogue Options Alternative Academy was evaluated with alternative education accountability provisions in school years 2016–17 and 2017–18 but did not receive ratings for school years 2018–19 to 2021–22.
(7) Kleberg Elementary School and Memorial Middle School closed in school year 2021–22.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2020–21, and Texas Academic Accountability Report, school year 2021–22.

FIGURE 2–4
KINGSVILLE ISD'S EDUCATION SERVICE DELIVERY ORGANIZATION
SCHOOL YEAR 2021–22
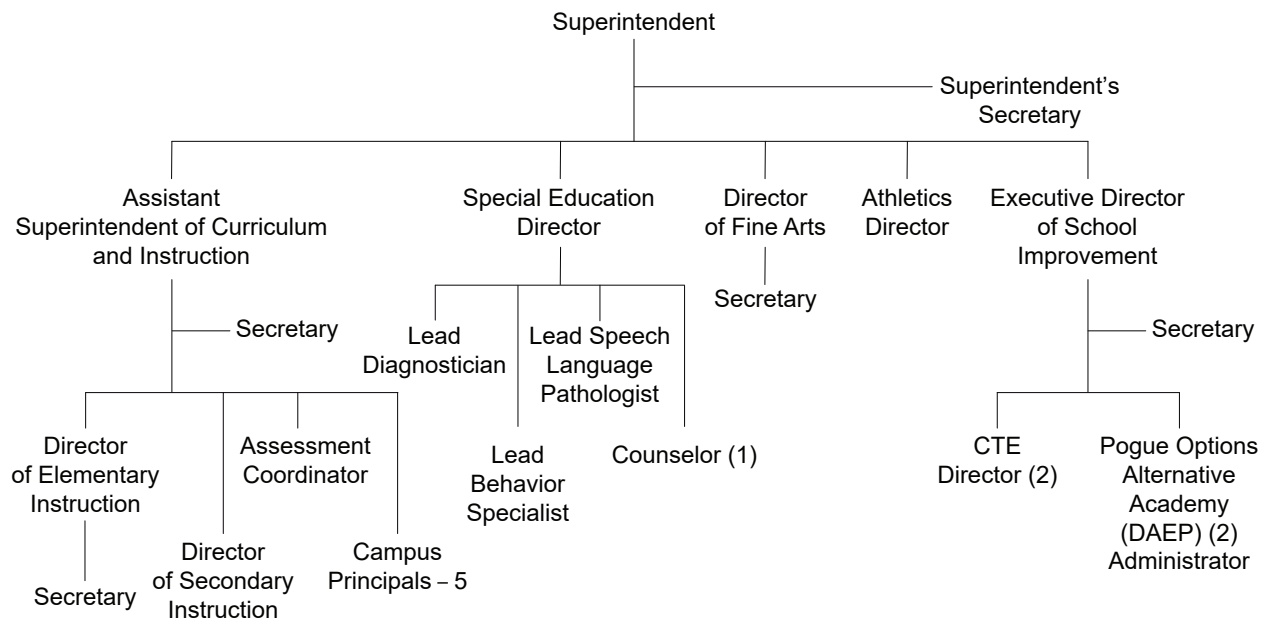
NOTES:
(1)   The counselor is evaluated by campus principals.
(2)   CTE=career and technical education; DAEP= disciplinary alternative education program.
SOURCE: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

For school year 2018–19, two campuses earned D ratings, and two campuses earned F ratings. The district and high school were not rated that year because the Texas Education Agency (TEA) determined that issues with data accuracy or integrity had compromised performance results, making it impossible to assign a rating. Since the review team's onsite visit, the district received accountability ratings for school year 2021–22. During that year, four campuses earned C ratings and the district earned an overall C rating.

Figure 2–4 shows Kingsville ISD's education service delivery organization.

As shown in **Figure 2–4**, staff with educational service duties that report to the superintendent include the assistant superintendent of curriculum and instruction, the special education director, the director of fine arts, the athletics director, and the executive director of school improvement.

The Curriculum and Instruction Department, led by the assistant superintendent of curriculum and instruction, includes a director of elementary instruction, a director of secondary instruction, an assessment coordinator, campus principals, and two secretaries. Campus principals oversee

the assistant principals, instructional teacher coaches (ITC), teachers, paraprofessionals, and library aides on their campuses. The directors of elementary and secondary instruction oversee core subject curriculum and instruction, implement professional development and coaching with the ITCs, and collaborate with principals and assistant principals on leadership coaching. The director of elementary instruction also oversees the programs for dyslexia, English as a Second Language, and early childhood education, and oversees two of the district's major grants, the Education Stabilization Fund Focused Support Grant and the Resilient Schools Support Program grant. The director of secondary instruction oversees programs for gifted and talented students and advanced placement, and Proclamation 2022, a State Board of Education directive for instructional materials that address health and physical education.

TEA issued a determination level for special education differentiated monitoring and support of 4, needs substantial intervention, to Kingsville ISD for school year 2020–21. This designation is the highest level of concern TEA identifies for a district's special education program, and school districts with this designation participate in

ongoing collaboration and progress monitoring with TEA and the regional Education Service Centers to meet strategic support plan goals. The superintendent of Kingsville ISD recruited an experienced special education administrator in school year 2021–22 to serve as the district's special education director and to implement substantial reforms in the district's special education processes and services. The director oversees teams of diagnosticians, behavior specialists, speech language pathologists, and school counselors.

The executive director of school improvement oversees targeted improvement initiatives and programs, including oversight of the DAEP and Career and Technical Education (CTE) programs. The executive director also monitors postsecondary data submissions to TEA in accordance with the required auditing process following the district's data integrity issues during school year 2018–19.

The director of fine arts and the athletics director are responsible for curriculum, competitions, and program development for their respective departments.

DETAILED ACCOMPLISHMENTS

CAREER AND TECHNICAL EDUCATION

Kingsville ISD's comprehensive CTE program has a high enrollment rate.

The district's CTE program offers various courses and certifications to meet students' needs in grades nine to 12. Grade eight students receive a career exploration class and complete a survey to determine potential career interests. The CTE director oversees the CTE Department and reports to the executive director of school improvement.

Kingsville ISD's CTE program offers 10 programs of study: animal science; applied agricultural engineering; automotive collision repair technology; automotive service technology; business management; entrepreneurship; digital communications; engineering; healthcare therapeutic/diagnostics; and teaching and training. District staff said they selected these programs of study based on industry demands, job wages, and degree offerings available at a local university, Texas A&M University – Kingsville. Kingsville ISD's CTE program garners significant interest from students. **Figure 2–5** shows that enrollment in the CTE program has exceeded state averages from school years 2018–19 to 2020–21, the most recent school year for which data are available. Additionally, Kingsville ISD's CTE enrollment rates were

FIGURE 2–5
CAREER AND TECHNICAL EDUCATION ENROLLMENT RATES COMPARED TO STATE AND REGION 2 (1)
SCHOOL YEARS 2018–19 TO 2020–21

YEAR	KINGSVILLE ISD	REGION 2 (2)	STATE
2018–19	**67.1%**	62.1%	58.4%
2019–20	**59.4%**	64.7%	59.0%
2020–21	**66.0%**	62.4%	58.5%

NOTES:
(1) Enrollment rates are based on the percentage of annual graduates enrolled in a coherent sequence of career and technical education courses as part of a four-year plan of study.
(2) Region 2=regional Education Service Center II.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2018–19 to 2020–21.

greater than the regional Education Service Center II (Region 2) enrollment rates for school years 2018–19 and 2020–21.

Kingsville ISD's CTE Department provides budgeted funding for CTE teachers to attend professional development conferences. The early college administrator also attends professional development conferences and disseminates the information to CTE teachers. The district evaluates its CTE program annually. As an evaluation tool, the district utilizes a CTE program evaluation rubric that the early college administrator received from Bryan ISD during a professional development conference.

By implementing a comprehensive CTE program, Kingsville ISD is providing students with the opportunity to acquire industry skills and expand their career opportunities.

INSTRUCTIONAL PROCESSES

Kingsville ISD has implemented several processes to improve instruction for students.

During school year 2020–21, the district implemented a new instructional teaching coach (ITC) position at each campus. These staff observe, coach, and mentor teachers. They support the implementation of professional development, monitor and support the implementation of adopted curricula, and provide feedback or modeling to improve instructional practices. The implementation of this role in the district aligns with a 2018 examination of 60 studies conducted by researchers Matthew Kraft, David Blazar, and Dylan Hogan, *The Effect of Teacher Coaching on Instruction and Achievement: A Meta-analysis of the Causal Evidence*, which suggests that instructional coaching is one of the most positive school-based interventions. The district

continues to refine and improve the ITC role to support teachers in Kingsville ISD.

The assistant superintendent of curriculum and instruction also developed a process for instructional staff to contribute to developing curriculum guidance materials for the district. Teaching staff are invited and ITCs are required to participate in paid curriculum-writing sessions to develop curriculum-pacing guides. Staff report that these guides are helpful tools for classroom teachers, and this process builds the capacity and representation of instructional staff in the curriculum development process.

Additionally, Kingsville ISD implemented a districtwide process during school year 2020–21 for analyzing student achievement data to guide curriculum and instruction. The assistant superintendent of curriculum and instruction and staff trained administrators, teachers, and ITCs in the data-driven instruction (DDI) protocol. DDI practices include assessing student learning, analyzing the assessment data, and adjusting instruction at regular cycles in response to the data. Kingsville ISD's Curriculum and Instruction Department staff disaggregate student achievement data for teachers and administrators into several sets, including by campus, by grade level, by teacher, and by Texas Essential Knowledge and Skills (TEKS) standards. Teachers, who have received professional development in the DDI protocol, have ongoing opportunities to analyze the data sets and to apply this analysis to improve their instructional planning and delivery.

DETAILED FINDINGS

GIFTED AND TALENTED EDUCATION (REC. 6)

Kingsville ISD lacks an effective program for gifted and talented (GT) students.

The Texas Education Code, Section 29.122(a), requires each district to adopt a process to identify GT students and establish a program to meet those students' needs by grade level.

Since calendar year 1990, the State Board of Education has adopted and updated the Texas State Plan for the Education of Gifted/Talented Students to guide school districts in establishing and improving services for identified students. Districts are accountable for the services as described in the state plan, which include standards for six aspects of GT service delivery.

Figure 2–6 shows the six elements of GT program service delivery and the related state accountability standards compared to Kingsville ISD's GT program.

As shown in **Figure 2–6**, Kingsville ISD's GT program is noncompliant with several components of the state plan, including the areas of fidelity of services, service design, curriculum and instruction, and family and community involvement. The district has no curriculum or handbook for its GT program, and students identified as GT began receiving GT-specific services in March 2022. According to staff interviews, GT services are determined at a classroom level without oversight or guidance from the district, other than a requirement that all GT students must complete a science fair project. Staff reported that district communication with parents is minimal. The district sent one letter regarding GT assessment and services to families but has not provided progress and performance updates to parents, nor involved them in GT program evaluation.

During school year 2021–22, the district made some efforts to strengthen its GT program. In coordination with Region 2, Kingsville ISD provided teachers with the 30.0 hours of training required to provide GT services pursuant to the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, Section 89.2. After this summer training before the start of the school year, all GT students were placed in classrooms with teachers with the required GT training hours. However, at the time of the onsite visit, students did not receive GT-specific services based on a GT curriculum adopted by the district. Kingsville ISD also has begun assessing more students to receive GT services. According to staff, the district tested all kindergarten students at the beginning of school year 2021–22 and planned to test students in grades one to 11 during the spring 2022 semester. Staff reported that they developed a GT handbook; however, the district did not provide a copy of the handbook to the Legislative Budget Board's School Performance Review Team.

Without a robust GT program, Kingsville ISD is underserving this student population and may be limiting the potential of GT students to attain high academic achievement. The state plan includes the following goal: "... students who participate in services designed for gifted/talented students will demonstrate skills in self-directed learning, thinking, research, and communication as evidenced by the development of innovative products and performances that reflect individuality and creativity and are advanced in relation to students of similar age, experience, or environment.

FIGURE 2–6
ACCOUNTABILITY STANDARDS IN THE TEXAS STATE PLAN FOR THE EDUCATION OF GIFTED/TALENTED STUDENTS COMPARED TO KINGSVILLE ISD'S PROGRAM
SCHOOL YEAR 2021–22

STATE PLAN	SUMMARY OF STANDARDS	KINGSVILLE ISD PROGRAM
1. Fidelity of Services – School districts comply with the state's accountability standards for gifted-and-talented (GT) education and monitor the effectiveness of assessment and services for GT students.	The district conducts annual evaluation and long-range evaluation activities to continue service development. Trained administrators regularly monitor the development and delivery of curriculum for GT students. The district establishes guidelines for evaluation of resources used to serve GT students and for selecting materials that are appropriate for differentiated learning. The district develops a comprehensive manual that describes all GT programs, services, assessments, and communications.	The district has not developed a GT curriculum and has no evidence of an evaluation process for GT services at the district and no evidence that the district has implemented a GT manual.
2. Student Assessment – GT identification procedures and progress monitoring enable students to demonstrate and develop their diverse talents and abilities.	The district assesses students from kindergarten to grade 12 and provides GT services to identified students. The district should conduct such an assessment at least once per school year.	The district assessed all kindergarten students at the beginning of school year 2021–22. Grades one to 11 assessments were scheduled for March 2022.
3. Service Design – A flexible system of viable service options provides a research-based learning continuum that is developed and implemented consistently throughout the district to meet the needs and reinforce the strengths and interests of GT students.	The district provides identified GT students with multiple learning opportunities that are commensurate with their abilities and that emphasize content in four foundation curricular areas. Services are available during the school day and throughout the school year. Parents are informed of these options.	The district provided no services to GT students until March 2022; these services are limited to participation in the district's science fair and classroom-based services without district oversight. The district sent one informational letter regarding GT assessments and services to parents.
4. Curriculum and Instruction – Districts meet the needs of GT students by modifying the depth, complexity, and pacing of the curriculum and instruction ordinarily provided by the school.	The district provides opportunities for students to pursue areas of interest in selected disciplines through guided and independent research. The district includes provisions to improve services to GT students in district and campus improvement plans. Educators adapt and modify the core or standard curriculum to meet the needs of GT students and those with special needs, such as gifted students who also have learning disabilities, highly gifted students who may require specialized instruction, and English learners.	The district does not offer a GT curriculum, nor did it provide services for GT students until March 2022. The school year 2021–22 district and campus improvement plans do not include provisions to improve services to GT students.
5. Professional Learning – All staff involved in the planning, development, delivery, and administration of services to GT students possess the knowledge required to develop and provide differentiated programs and services.	Before providing instruction and services as part of the district's defined GT services, teachers must have accrued at least 30.0 hours of professional learning that includes the nature and needs of GT students, identification and assessment of GT students, and curriculum and instruction for GT students.	According to the Kingsville ISD's 2020–21 Texas Academic Performance Report, four of the district's educators had received the 30.0-hour training necessary to serve GT students.
6. Family/Community Involvement – The district involves family members and the community in services for GT students throughout the school year.	The district provides orientation and periodic updates to parents of identified students who receive GT services.	The district sent one letter regarding GT assessment to parents. No evidence shows that the district provides periodic updates to families on the progress of their GT students.

Sources: Legislative Budget Board School Performance Review Team; State Board of Education, Texas State Plan for the Education of Gifted/Talented Students, April 2019; Kingsville ISD, March 2022.

FIGURE 2–7
KINGSVILLE ISD ADVANCED ACADEMIC INDICATORS COMPARED TO THE STATE AND REGION
SCHOOL YEAR 2020–21

MEASURE	KINGSVILLE ISD	REGION 2 (1)	STATE
STAAR percentage rated Masters Grade Level, All Subjects (2)	**6.0%**	15.0%	18.0%
Advanced course/dual-credit course completion	**27.4%**	43.3%	46.3%
AP/IB – Participation (3)	**7.9%**	11.8%	22.0%
SAT/ACT– students tested (4)	**40.3%**	59.2%	76.7%
SAT/ACT – percentage of examinees who scored at or greater than the criterion score	**10.8%**	26.5%	35.7%

NOTES:
(1) Region 2=regional Education Service Center II.
(2) STAAR=State of Texas Assessments of Academic Readiness.
(3) Participation rates show the percentage of students in grades 11 and 12 who completed the College Board's Advanced Placement (AP) examinations or the International Baccalaureate (IB) Diploma Program examinations.
(4) SAT and ACT are standardized college admissions tests that measure aptitude and knowledge retention.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

High school graduates who have participated in services for gifted/talented students will have produced products and performances of professional quality as part of their program services." **Figure 2–7** shows Kingsville ISD's advanced academic indicators compared to those in Region 2 and the state. Kingsville ISD students perform at less than state and regional averages for all indicators.

The National Association for Gifted Children (NAGC) developed a 2019 guide for GT programming standards for prekindergarten to grade 12 in six areas: learning and development, assessment, curriculum and instruction, learning environments, programming, and professional development. The guide states that teachers should apply the theory and research-based models of curriculum and instruction related to GT students and respond to students' needs by planning, selecting, adapting, and developing culturally relevant curriculum.

Kingsville ISD should develop and implement a comprehensive program for GT students to meet their instructional needs.

The assistant superintendent of curriculum and instruction and director of secondary instruction should analyze the district's GT program to determine areas for improvement. The director of secondary instruction, in collaboration with relevant stakeholders and district staff, should perform the following actions:

- develop a GT program model for the district, including program standards, objectives, assessment and screening procedures, professional development, parental communication, and evaluation;

- align the district's program model with NAGC's gifted programming standards and the Texas State Plan for the Education of Gifted/Talented Students;

- solicit stakeholder input on the model;

- revise the model based on stakeholder input;

- submit the finalized plan to the Kingsville ISD Board of Trustees for adoption;

- implement the adopted plan;

- revise the plan based on evaluation; and

- monitor and revise the program as needed.

Since the time of the review team's onsite visit, the district has developed at GT Handbook and staff indicated it is being implemented at all campuses. The handbook describes learning opportunities for GT students such as differentiation and GT Cluster Grouping.

The district could implement this recommendation with existing resources.

DISCIPLINARY ALTERNATIVE EDUCATION PROGRAM (REC. 7)

Kingsville ISD's DAEP lacks a consistent transition process for exiting students and may not be meeting the students' instructional needs.

Kingsville ISD's DAEP, Pogue Options Alternative Academy, has its own campus and is staffed by an administrator who serves as the middle school classroom teacher, a high school classroom teacher, a special education inclusion teacher, and a long-term substitute teacher. The administrator reports to

the executive director of school improvement. Pogue serves middle school and high school students who committed an offense that resulted in a mandatory or discretionary removal from the classroom pursuant to the Kingsville ISD Student Code of Conduct. Students are placed at Pogue for a period ranging from 15 days to 90 days, depending on the severity of the offense. Pogue has two classrooms, one for students in grades six to eight and another for students in grades nine to 12. Each classroom has a maximum capacity ranging from 12 to 13 students. While assigned to Pogue, students complete assignments on an online learning platform. Staff report aligning the students' online coursework to the TEKS taught in their general education classes. General education students attending Pogue are not provided transportation services; however, the district began providing transportation services to special education students attending Pogue during school year 2021–22.

Staff interviews revealed conflicting views regarding the instructional services provided at Pogue and the online learning platform utilized by students. Some staff provided positive feedback, reporting that the online platform was easily customizable to align with TEKS and the students' general education coursework. Other staff reported that students have expressed that the online coursework is tedious and too challenging.

Students receiving special education services represent a significant percentage of placements at Pogue. From school years 2016–17 to 2019–20, special education DAEP placements as a percentage of total DAEP placements ranged from 16.5 percent to 26.7 percent. Except in limited circumstances, students receiving special education services cannot be placed in a DAEP for violating the Student Code of Conduct if the behavior was caused by or had a direct and substantial relationship to their disabilities. Students who receive special education services also cannot be placed in DAEP if the behavior was caused by the campus's failure to implement the student's Individualized Education Program.

Although the student's Admission, Review, and Dismissal committee meets before the district places a student who receives special education services at Pogue, staff report that the district has not developed comprehensive written procedures to prompt the implementation of required safeguards for such students. For example, staff report that Kingsville ISD began providing required transportation services to students at Pogue who receive special education services only after the special education director received a complaint about student safety in school year 2020–21.

Additionally, staff interviews indicated that the district has not adopted a comprehensive discipline management system, and that current behavior programs are implemented inconsistently between campuses and among classrooms at the same campuses. The district has implemented few prevention programs and behavioral interventions, and staff reported that DAEP classrooms overall are at capacity. Staff said that the district often transitions DAEP students from the program early, transitioning students that have the fewest remaining days early to accommodate newly placed students.

Staff also provided conflicting information regarding students' transition processes from Pogue to general education campuses. Some staff described specific processes that included transitional paperwork, parent meetings, and assigning students to mentor teachers. Other staff reported that the district has no formal transition process and that district staff may re-enroll students in general education classes without notifying teachers and appropriate staff. Additionally, staff said that the district does not evaluate students' needs when they return to the general education setting, nor do students meet with counselors as part of the transition process.

The National Alternative Education Association (NAEA) is a volunteer organization that facilitates information sharing, provides professional development, shares best practices, and advocates for alternative education programs such as DAEPs. Its 2018 publication, *Exemplary Practices in Alternative Education: Indicators of Quality Programming*, includes the following best practices:

- schools provide small-group lessons in conjunction with project-based learning to support collaboration and teamwork;

- schools blend technology into the instructional delivery process across all content areas;

- the district conducts a formal transition process for students from entry to exit, which includes the following elements: a program orientation that features building rapport; an assessment of the student's instructional needs; individualized education program review; information and record sharing regarding the student; short-term and long-term goal setting; development of an individualized student plan; and other mechanisms intended to help the student succeed in the alternative education setting;

- the district has established a student support team (SST) that consists of educators from the school of origin, educators from the alternative school, the student, parents or guardians, and other trained transitional staff. The team is involved directly in all aspects of the transition process, including assessment, planning, and implementation of the student's transition plan;

- before a student's entrance and exit from the school, the SST coordinates transition services among all appropriate entities to promote successful entry into the student's next educational setting; and

- transition planning includes referral and timely access to support services, including mental health, public health, family support, housing, physical fitness activities, and other youth services.

The NAEA also has an exemplary practices rubric to assess how well an alternative education program is following these best practices.

Kingsville ISD should assess the district's DAEP transition process and instructional services.

The executive director of school improvement, assistant superintendent of curriculum and instruction, director of secondary instruction, and Pogue administrator should use the NAEA's exemplary practices rubric to assess the district's process for transitioning students from the DAEP to their home campuses and to evaluate the effectiveness of the instructional services provided at the DAEP. The executive director of school improvement and the special education director should evaluate DAEP placements for students who receive special education services and develop written guidelines for placement deliberations for these students.

The executive director of school improvement should document recommendations from the evaluation process and submit them for approval by the superintendent and board.

The district could implement this recommendation with existing resources.

CURRICULUM MANAGEMENT (REC. 8)

Kingsville ISD does not provide teachers consistent, adequate professional development support and instructional and technological resources to implement the newly adopted curriculum effectively.

The assistant superintendent of curriculum and instruction developed a district curriculum management plan in school year 2021–22. As of March 2022, the curriculum management plan remained in draft form and had not been disseminated fully among staff. Kingsville ISD's curriculum management plan states the district will provide professional development to teachers regarding the use of the written curriculum and regularly evaluate the use of curricular resources. However, staff reported during interviews that the district's implementation of new curriculum does not conform consistently to the district's curriculum management plan as it relates to professional development and curricular resources.

For some core academic disciplines, Kingsville ISD has implemented the curriculum in accordance with its curriculum management plan and best practices. Specifically, district staff confirmed that the implementation of the elementary math curriculum included the necessary instructional resources for teachers to deliver the lessons, which was accompanied by continuing professional development provided, in part, by a consultant employed by the curriculum's publisher. Staff also said that the English language arts and reading curricula for middle school and high school have been supported by varying degrees of continuing professional development. However, for other core academic disciplines, staff reported that they did not receive the necessary instructional resources and professional development to implement the curriculum. Staff reported receiving a short demonstration of the curriculum at the beginning of the school year without the necessary technological and instructional resources to implement the curriculum. Without the necessary resources to implement the new curriculum, teachers have implemented supplemental resources through existing technological and instructional resources. The use of supplemental resources in place of the curriculum can result in decreased rigor of instruction, failure to teach required standards, and a lack of instructional alignment within grades and from one grade to the next.

Kingsville ISD's inconsistent implementation of core academic disciplines likely has contributed to the substandard performance of its students on state assessments compared to the average performance of other school districts in Region 2 and statewide. **Figure 2–8** shows that the percentages of Kingsville ISD students performing at Meets grade level or above were less than the average rates for Region 2 and the state in every core academic discipline for school year 2020–21.

FIGURE 2–8
KINGSVILLE ISD STUDENTS THAT MEET GRADE LEVEL OR ABOVE ON THE STATE OF TEXAS ASSESSMENTS OF ACADEMIC READINESS COMPARED TO REGIONAL AND STATE AVERAGES FOR ALL GRADE LEVELS
SCHOOL YEAR 2020–21

SUBJECT	KINGSVILLE ISD	REGION 2 AVERAGE (1)	STATE AVERAGE
English Language Arts/Reading	**24%**	41%	45%
Mathematics	**13%**	33%	37%
Writing	**12%**	27%	30%
Science	**19%**	37%	44%
Social Studies	**30%**	44%	49%

NOTE: (1) Region 2=Regional Education Service Center II.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

Instruction Partners is a nonprofit organization that provides instructional support to educational institutions. Its online Curriculum Support Guide includes a framework that outlines key action steps for implementing a curriculum, including the following questions that districts should consider during the curriculum procurement process:

- What are all the possible resources the district might need for its selected curriculum?

- What are the priority resources?

- What are the options for printing or procuring each resource?

- What is the total number of materials needed, including those for special education teachers, EL teachers, at-home teachers and students, and alternative schools?

- What technology will the district need to implement its curriculum?

Instruction Partners also suggests that school districts develop a materials procurement organization template as a tool to organize all curriculum materials. The framework provides additional questions and resources to guide the district regarding the storage and distribution of materials and other aspects of the curriculum implementation process.

The National Institute for Excellence in Teaching (NIET) is a nonprofit organization that partners with educational institutions to increase teacher effectiveness. Its 2020 publication *High-Quality Curriculum Implementation: Connecting What to Teach with How to Teach It* includes six key lessons for implementing a high-quality curriculum. NIET emphasizes the importance of establishing a professional development plan for curriculum implementation and providing campus administrators and teachers with training on the curriculum prior to implementation and throughout the school year. Effective districts encourage leaders to collaborate continuously on curriculum implementation, identify challenges faced by teachers during this process, and address those challenges through coaching and professional learning opportunities.

Kingsville ISD should provide administrators and teachers with necessary professional development opportunities and curricular resources consistently.

The assistant superintendent of curriculum and instruction, in collaboration with relevant stakeholders and district staff, should perform the following activities:

- complete development and revisions of the curriculum management plan;

- revise the curriculum management plan to address the adoption of new curricular resources;

- require staff to follow the professional development and curriculum adoption provisions of the curriculum management plan; and

- implement and disseminate the district's curriculum management plan to all relevant stakeholders.

The district could implement this recommendation with existing resources.

STUDENT INTERVENTIONS (REC. 9)

Kingsville ISD has not implemented districtwide procedures to deliver effective, consistent academic and behavior interventions for struggling students.

TEA recommends that districts implement a multitiered system of support (MTSS), a framework of interventions and supports to address students' behavioral and academic challenges. MTSS helps campuses and districts to organize resources by aligning academic standards with behavioral expectations and implementing that organization within a specified period to accelerate student performance, achievement, and proficiency. MTSS can be considered an overall framework for other support systems, such as data-based individualization, Response to Intervention, and Positive Behavioral Interventions and Supports (PBIS). A primary component of MTSS is using assessment data to drive differentiated instruction and decision-making for all students. By using MTSS, districts can identify students who need additional support and provide them with evidence-based support to reduce academic and behavioral challenges.

A tiered intervention system typically consists of three tiers. Tier 1, universal intervention, is a systematic approach for supporting all students schoolwide. Tier 2, targeted intervention, provides instruction and support in small groups to students experiencing challenges with academics or behavior. Typically, about 20.0 percent of students require targeted intervention. Tier 3, intensive intervention, is intended for students who do not respond adequately to universal and targeted intervention. Typically, less than 5.0 percent of students require intensive intervention.

During interviews, staff reported that Kingsville ISD lacks an effective, structured, districtwide intervention process for academics and behavior, and each campus implements interventions differently.

For instructional interventions, some Kingsville ISD campuses maintain student intervention teams to discuss and monitor student progress and responses to interventions; however, these teams do not receive guidance or monitoring from district Curriculum and Instruction Department staff. According to staff, documentation of progress monitoring is limited and has been identified by the district as a critical area for improvement. At the middle school and high school campuses, the district has a designated daily time for interventions. However, staff said that activities conducted during this period lack the following components of strong academic interventions: targeted curriculum, intentionally selected standards, grouping strategies, and progress monitoring.

As shown in **Figure 2–8**, Kingsville ISD struggles with student academic performance on state assessments. Because the district has not implemented a comprehensive instructional intervention process, staff cannot ensure that students are receiving the instruction and supplemental supports they need to be successful. Failure to implement a consistent and appropriate intervention process may continue to result in poor academic performance, especially for struggling students.

In addition to inadequate instructional interventions for students, the district also has not implemented a districtwide, comprehensive behavior-management model. During interviews, staff reported that student behavior issues are a significant concern in the district, especially incidents involving fighting, use of e-cigarettes or other vaping, and destruction of school property. The district does not offer significant prevention programming related to these behavioral concerns. Student behavior interventions are inconsistent across campuses and lack guidelines for documentation and progress monitoring. Placements in the district's DAEP, the highest level of behavior intervention, are so frequent that staff reported the program is often at capacity, and students are transitioned out of the program early to make positions available for newly placed students.

Kingsville ISD staff reported that the district previously implemented, but is no longer utilizing, the PBIS program. PBIS is a multitiered framework that provides schools with an established set of procedures to support students' behavioral needs. However, when the Legislative Budget Board's School Performance Review Team visited the district in March 2022, teachers were responsible for implementing their own behavior management models in their classrooms. Additionally, staff said that administrators offer more support regarding behavior management to teachers assigned to grade levels or subjects that receive State of Texas Assessments of Academic Readiness (STAAR) testing.

Several Kingsville ISD staff reported that the district's behavior-management model for school year 2021–22 incorporates elements of the Student Code of Conduct and the Capturing Kids' Hearts program. The Kingsville ISD Student Code of Conduct, approved by the board in August 2021, is posted on the district's website. This resource establishes standards for student conduct, conduct violations, and disciplinary measures. However, the 2021–22 Student Code of Conduct is not a stand-alone tool but rather a supplemental resource that can be used as part of a comprehensive behavior management model.

The Capturing Kids' Hearts program aims to improve school culture by providing teachers with professional development on processes and strategies focused on social-emotional well-being, relationship building, and student connectedness. District staff received Capturing Kids' Hearts training in fall 2021, and the district has a team of staff that receive training from the vendor and, in turn, provide periodic professional development updates to other staff. Staff reported having positive experiences with the program. However, based on the review team's observations and staff interviews, the program is not implemented consistently across all campuses and classrooms in the district.

The effects of the district's disjointed approach to behavior management are apparent in parental opinion. According to a parental survey conducted by the review team, 37.5 percent of respondents agreed that students feel safe and secure at school, and 34.4 percent agreed that classrooms are safe environments for students and teachers.

The TEA-funded project Tiered Interventions Using Evidence-based Research (TIER) is intended to provide educators, caregivers, and other educational stakeholders with knowledge and materials to guide the appropriate implementation of MTSS. TIER's website includes a series of modules containing various components of MTSS. These modules deliver information about communities, leadership, academics, culturally and linguistically responsive practices, decision making, screening, progress monitoring, mental health, and behavior.

Implementing MTSS is a process that involves research, collaborative planning by district and campus teams, continuous monitoring and evaluation, and strategy refinement based on evidence. A school district participates in a four-step process that includes strong documentation of participation and completion of each of the following stages:

- exploring and adopting – school districts assess their needs, gather information about the MTSS framework, determine if the district's needs and the expected outcomes of MTSS align, and achieve a consensus among key stakeholders to implement MTSS;

- planning – districts prepare for implementation, gather and review data, develop an action plan, and define measurable benchmarks of progress;

- implementing – MTSS is intended to promote the following improvements when practitioners integrate

the framework into all schools and classrooms: staff become more skilled in data-based decisions and deliver evidence-based and culturally responsive instruction; administrators and teacher leaders support and facilitate new practices, procedures, and processes; the community increasingly understands and supports the framework; and the identification of clear, expected outcomes guides the district and campus planning processes; and

- continuously improving – the district and campuses evaluate their progress, adjust their practices based on evaluation, and monitor changes to promote sustainability of MTSS.

Kingsville ISD should implement an MTSS process districtwide and regularly evaluate student intervention programs for effectiveness.

To begin developing an effective MTSS process, Kingsville ISD should establish district-level and campus-level MTSS teams consisting of selected district and campus administrators, teachers, and counselors that specialize in academic and behavioral interventions. The district-level team should develop long-term and short-term goals for establishing a comprehensive MTSS process to use at all campuses. The district-level teams should research successful MTSS programs at other districts and seek assistance from Region 2 to help establish these goals.

As part of developing this process, Kingsville ISD should define the roles and responsibilities of staff regarding MTSS. The district should develop processes and systems to collect, document, and analyze student progress and outcomes.

After the MTSS process is developed, Kingsville ISD should develop and implement a process to evaluate the district's intervention programs and determine whether to incorporate them into the new MTSS process. The MTSS teams should prioritize implemented intervention programs and develop evaluation plans for each program, which should include the following components:

- stated purpose;

- evaluation questions;

- data sources and data collection procedures;

- established timeline;

- methodology for analysis; and

- reporting structure and requirements.

The district should publish an annual report summarizing these evaluations for distribution to stakeholders, including the board, staff, and community.

The teams should present the campus-level and district-level MTSS processes to the board. After the MTSS process is approved and implemented, the district should provide staff with ongoing training and professional development regarding the district MTSS process. The superintendent should designate staff to monitor regularly the consistent implementation of the revised MTSS process at all campuses.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

FINE ARTS AND PHYSICAL EDUCATION

Kingsville ISD offers inconsistent fine arts and physical education programming among its campuses.

An experienced director of fine arts oversees the delivery of extensive fine arts opportunities at the secondary level, including band, theater arts, and mariachi band. Kingsville ISD's fine arts students typically perform well at secondary-level state competitions, but fine arts opportunities for elementary students are limited. During school year 2021–22, elementary students received music instruction once a week during the fall semester, and art instruction once a week during the spring semester. According to the director of fine arts, budget constraints and staffing cuts have limited fine arts programming and prevented the district from offering both art and music year-round to elementary students.

Kingsville ISD also offers various athletics opportunities to its secondary students, including access to many competitive sports and modern, well-equipped facilities. However, staff report that the physical education program lacks effective, comprehensive curriculum for elementary and secondary students. Elementary students also have limited facilities and space for physical education; none of the elementary campuses has a gymnasium.

The superintendent should direct the director of fine arts and athletics director to evaluate their respective programs and develop recommendations to improve access to high-quality programming and curriculum at all campuses. The assistant superintendent of curriculum and instruction should assist the directors in developing and monitoring curriculum for students in all grade levels.

EARLY CHILDHOOD EDUCATION

Kingsville ISD offers early childhood education at all three elementary campuses but lacks comprehensive guidance and support.

The assistant superintendent of curriculum and instruction assigned oversight of early childhood education to the director of elementary instruction. According to staff, prekindergarten teachers use Scholastic resources and CIRCLE assessment data to evaluate student progress. The director of elementary instruction said that she has little experience with early childhood education but is enrolled in self-directed trainings through Region 2. The district has not developed a procedures handbook to guide the early childhood program and has limited materials to promote the program in the community. Additionally, the district lacks a process for the comprehensive evaluation of the early childhood program and has not evaluated the effectiveness of the adopted curriculum or monitored its implementation in classrooms.

Strong early childhood education is critical to successful student performance outcomes and provides a framework for academic and social-and-emotional learning. A 2018 Harvard meta-analysis study, *Impacts of Early Childhood Education on Medium- and Long-Term Education Outcomes,* found that children who receive high-quality early childhood education are less likely to be placed in special education or retained in a grade level, and are more likely to graduate from high school than peers who did not receive this education.

The district should evaluate the effectiveness of the early childhood education program and its curriculum. The director of elementary instruction should continue building proficiency through training, research, and collaboration with professional cohorts. Curriculum and Instruction Department staff should develop a process for program evaluation and develop a handbook to guide district efforts.

COUNSELING SERVICES

Kingsville ISD's school counselors have various job duties outside their core discipline, which may limit their abilities to support students effectively.

For school year 2021–22, each of the three elementary campuses had one full-time school counselor, the middle school had two full-time counselors and a counselor's clerk, and the high school had four full-time school counselors. Staff interviews indicated that counselor responsibilities vary at each campus. In addition to individual and group counseling, counselor responsibilities also include scheduling, testing referrals, and test administration. The Texas Education Code, Section 33.006(d) requires each school district to adopt a policy that requires school counselors to commit at least 80.0 percent of total work time to duties that are components of a counseling program. Kingsville ISD Board Policies DP (LEGAL) and DP (LOCAL) establish these guidelines for counselors, but staff reported that is spent on tasks other than counseling services require an estimated 50.0 percent of counselors' time, which prevents them from dedicating adequate time to counseling services for students

In response to evidence gathered during school year 2020–21 that counselors are tasked with too many responsibilities unrelated to counseling, the district hired a counselor's clerk at the middle school and transferred testing responsibilities to assistant principals. However, staff reported that the counselor's clerk frequently filled in as a substitute teacher, and counselors committed time to train assistant principals on the process of administering tests, all of which continues to deprive counselors of sufficient time to perform their essential job functions.

Kingsville ISD should evaluate whether the current roles and responsibilities of school counselors limit their abilities to support students. Campus principals should coordinate with their respective school counselors to align their current roles and responsibilities to their job descriptions and with board policy and statute.

Since the time of the review, staff indicated that the district instituted a counselor tracking document for school year 2022–23. This resource requires counselors to submit their daily activities so the district can ensure that they are meeting statutory counseling requirements.

ENGLISH AS A SECOND LANGUAGE PROGRAM

Kingsville ISD identifies fewer than 100 students, or 3.4 percent of its population, as English learner (EL)/emergent

bilingual students, compared to the state average of 20.7 percent. Considering the low numbers of EL students in the district, the district offers English as a Second Language (ESL) services outside of the general education classrooms and does not provide bilingual education.

The director of elementary instruction, the district's ESL program coordinator, evaluated the program for all grade levels in school year 2020–21, which included reviewing student coursework, analyzing student data, and meeting with teachers in the district. The director identified key issues of concern, researched best practices, and implemented solutions to improve the ESL program.

The director of elementary instruction directed staff to review and correct EL student data in TEA's Public Education Information Management System, such as ensuring that EL students no longer were coded as receiving services through a program model not offered by the district.

To further improve compliance with regulations, the director of elementary instruction also assigned campus administrators to serve as chairs for all Language Proficiency and Assessment Committees (LPAC), statutorily required teams that determine instructional programming and serve as advocates for EL students. Assigning these administrators as LPAC chairs enabled more consistent support, streamlined training, and monitoring of LPACs at all campuses.

Additionally, district staff placed all EL students in reading/language arts classrooms with ESL-certified teachers. To encourage ESL certification, the district offered reimbursements for testing fees for staff that received their certificates. Teachers providing ESL services receive an annual stipend, regardless of whether they are certified as ESL teachers. To address an identified need for further instructional support for teachers working with EL students, the district provided two days of training in Sheltered Instruction Observation Protocol (SIOP), a research-based instructional model for addressing the academic needs of EL students.

The director of elementary instruction also documented procedures for the ESL program by developing an ESL handbook for the district.

Kingsville ISD has implemented several steps to improve its ESL program, especially in areas related to compliance. However, according to staff, the district has no formal plan to evaluate the program, and the district's ESL resources and supplemental materials may be insufficient. Additionally,

according to staff, the district did not implement the SIOP training consistently and some teachers did not understand it. Some staff identified a need for further professional development in ESL instructional strategies.

Kingsville ISD's assistant superintendent of curriculum and instruction and the director of elementary instruction should formalize an ongoing process to evaluate EL services and continue developing the ESL program to best meet the needs of EL students in the district.

FISCAL IMPACT

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

3. BUSINESS SERVICES MANAGEMENT

FINDINGS

♦ Kingsville ISD's budget-development process does not effectively incorporate input from campus administrators and department heads, align with district and campus improvement plans, nor prepare long-term spending plans.

♦ Kingsville ISD lacks a clearly defined contract-management function to ensure adequate administration, evaluation, and oversight of district contracts.

♦ Kingsville ISD lacks effective internal controls and segregation of duties in its human resources and payroll functions.

♦ Kingsville ISD does not have a districtwide process to tag and inventory capital assets that are not related to technology.

RECOMMENDATIONS

♦ **Recommendation 10: Develop and implement a budget-development process that aligns with district and campus improvement plans and incorporates input from campus administrators and department heads.**

♦ **Recommendation 11: Implement controls to improve contract-management functions.**

♦ **Recommendation 12: Review the roles, responsibilities, and duties of district staff, and develop a system enabling the segregation of their duties relating to the payroll function to ensure effective internal controls to prevent fraud, theft, and financial impropriety in accordance with board policy.**

♦ **Recommendation 13: Develop procedures to inventory and tag all district capital assets.**

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

Budget preparation and administration are critical to overall district operations. Financial management includes budget development and adoption, oversight of expenditure of funds, and involvement of campus and community stakeholders in the budget process. The management of accounting and payroll includes developing internal controls and safeguards, reporting account balances, and scheduling disbursements to maximize funds. Management of this area includes segregation of duties, use of school administration software systems, and providing staff training.
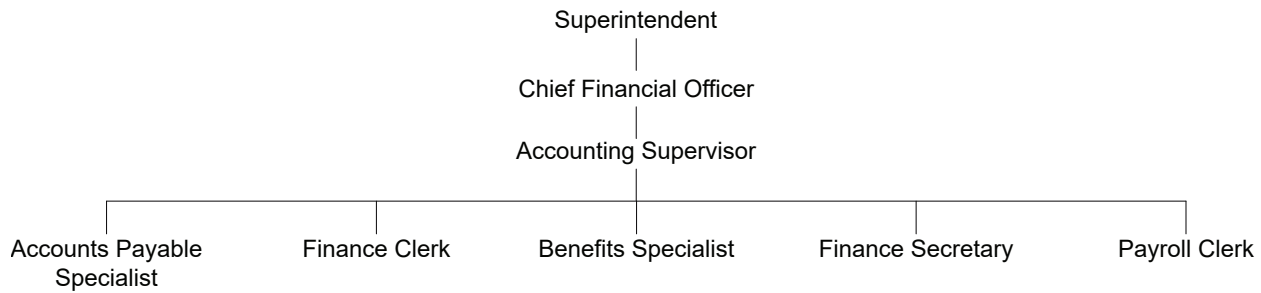
The management of investments includes identifying those with maximum interest-earning potential while safeguarding funds and ensuring liquidity to meet fluctuating cash-flow demands. Forecasting and managing revenue include efficient tax collections to enable a district to meet its cash-flow needs, earn the highest possible interest, and estimate state and federal funding. Capital asset management involves identifying a district's property (e.g., buildings, vehicles, equipment, etc.) and protecting it from theft and obsolescence. Insurance programs cover staff's health, workers' compensation, and district liability.

A school district's asset and risk-management function controls costs by ensuring adequate protection against significant losses with the lowest possible insurance premiums. This protection includes the identification of risks and methods to minimize their impact. Risks can include investments, liabilities, capital assets, and insurance. The management of assets and risks is dependent on the district's organization.

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

Kingsville Independent School District's (ISD) chief financial officer (CFO) oversees the Finance Department, which is responsible for the district's accounting, payroll,

FIGURE 3–1
KINGSVILLE ISD BUSINESS SERVICES MANAGEMENT ORGANIZATION
SCHOOL YEAR 2021–22

Superintendent

Chief Financial Officer

Accounting Supervisor

| Accounts Payable Specialist | Finance Clerk | Benefits Specialist | Finance Secretary | Payroll Clerk |

SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

FIGURE 3–2
KINGSVILLE ISD GENERAL FUND BALANCES
SCHOOL YEARS 2017–18 TO 2020–21

CATEGORY	2017–18	2018–19	2019–20	2020–21
Beginning Fund Balance	$8,163,645	$7,917,872	$9,739,506	$6,188,178
Ending Fund Balance	$7,917,872	$9,739,506	$6,188,159	$8,938,388
Increase/(Decrease)	($245,773)	$1,821,634	($3,551,347)	$2,750,210
Percentage change from previous year	(3.0%)	23.0%	(36.5%)	$44.4%

SOURCES: Legislative Budget Board School Performance Review Team; Kingsville Annual Financial Reports, fiscal years 2018 to 2021

purchasing, and risk-management functions. The CFO also serves as the financial adviser to the superintendent and the Board of Trustees. The accounting supervisor reports to the CFO and oversees an accounts payable specialist, a finance clerk, a benefits specialist, a finance secretary, and a payroll clerk. The CFO oversees payroll, purchasing, accounts payable, accounts receivable, and monthly accounting. **Figure 3–1** shows the organization of Kingsville ISD's Finance Department.

Figure 3–2 shows Kingsville ISD's fund balances for school years 2017–18 to 20120–21. A fund balance is the amount of district assets in excess of liabilities. These assets could include investments, delinquent taxes, accounts receivable, and inventories.

TEA recommends a minimum unrestricted fund balance of approximately two-and-one-half months of operating expenditures. Kingsville ISD's ending fund balance met this standard for school years 2017–18 and 2018–19 and 2020–21 but did not meet this standard in school year 2019–20.

Figure 3–3 shows Kingsville ISD's actual financial data for school years 2018–19 to 2020–21 and budgeted financial data for school year 2021–22. The highest expenditure categories for school year 2020–21 were: instruction, which

constituted 49.9 percent of the total operating expenditures; facilities, which constituted 11.8 percent; and school leadership, which constituted 6.5 percent.

The Legislative Budget Board's School Performance Review Team selected three school districts, Alice ISD, Robstown ISD, and West Oso ISD, as peer districts for Kingsville ISD. Peer districts are districts similar in size and other characteristics to Kingsville ISD that are used for comparison purposes. **Figure 3–4** shows Kingsville ISD's tax rate compared to the peer districts. The tax rate, set by the local district pursuant to the taxation laws of the state, drives local revenue. Kingsville ISD had the second highest tax rate compared to the peer districts for all school years from 2018–19 to 2020–21.

School districts in Texas receive two financial accountability ratings, including the School Financial Integrity Rating System of Texas (FIRST) and Smart Score. FIRST is Texas' school financial accountability rating system intended to hold public schools accountable for the quality of their financial management practices, and for the improvement of those practices. The goal of FIRST is to encourage Texas school districts to provide the maximum allocation possible for direct instructional purposes. The Smart Score rating measures academic progress and spending at Texas' school

FIGURE 3–3
KINGSVILLE ISD ACTUAL AND BUDGETED FINANCIAL DATA FOR THE GENERAL FUND, SCHOOL YEARS 2018–19 TO 2021–22

CATEGORY (1)	2018–19 ACTUAL	2019–20 ACTUAL	2020–21 ACTUAL	2021–22 BUDGETED
Revenue				
Local Tax	$10,055,853	$9,368,371	$9,498,011	$9,296,125
Other Local and Intermediate	$206,426	$291,284	$763,527	$37,699
State	$19,596,051	$16,786,077	$17,863,282	$17,047,808
Federal	$1,146,365	$549,126	$699,907	$1,257,412
Total Revenue (2)	**$31,004,695**	**$26,994,858**	**$28,824,727**	**$27,639,044**
Expenditures				
11 Instruction; 95 Instruction	$15,871,485	$16,484,665	$15,476,946	$15,406,226
12 Instructional Resources and Media Services (3)	$686,613	$1,216,228	$744,433	$882,801
13 Curriculum and Staff Development	$136,464	$141,689	$110,544	$127,113
21 Instructional Leadership	$497,026	$594,992	$727,987	$774,268
23 School Leadership	$2,033,000	$2,041,355	$2,016,325	$1,742,233
31 Guidance and Counseling Services	$914,563	$800,208	$760,840	$213,104
32 Social Work Services	$162,136	$95,634	$122,919	$14,278
33 Health Services	$408,978	$394,561	$411,487	$448,316
34 Transportation	$681,490	$779,025	$653,288	$934,228
35 Food Services	$0	$0	$0	$0
36 Extracurricular	$1,307,349	$1,182,839	$1,036,151	$1,113,034
41 General Administration	$1,555,612	$1,726,736	$1,819,788	$1,946,182
51 Facilities Maintenance and Operations (5)	$4,621,336	$5,000,382	$3,645,667	$4,339,083
52 Safety and Monitoring	$36,044	$128,518	$55,707	$58,321
53 Data Processing Services	$360,331	$287,030	$423,695	$442,026
61 Community Services	$2,927	$2,974	$3,204	$5,350
65 Debt Service	$168,980	$169,980	$168,980	$169,481
66 Capital Outlay	$538,007	$89,733	$18,714	$103,000
Total Expenditures	**$29,982,341**	**$31,136,549**	**$28,196,675**	**$28,719,044**

NOTES:
(1) Category numbers are the numerations used by the Texas Education Agency to classify expenditures.
(2) Total revenue excludes contributions from the Teacher Retirement System of Texas.
(3) The Instructional Resources and Media Services function code previously was labeled Library and Media Services.
(4) The Food Services function code represents the money spent from the district's general fund on activities whose purpose is managing a school's or district's food services program and serving regular and incidental meals, lunches, or snacks in connection with school activities. Food Services operations maintain their own funds, and this amount remains $0 unless the district's food services fund operates at a loss for the school year and the district must cover food service losses from its general fund.
(5) The Facilities Maintenance and Operations function code previously was labeled Plant Maintenance and Operations.
SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2018–19 to 2021–22.

districts and campuses. The Smart Score ratings range from one to five, with five being the best, indicating a district's success in combining cost-effective spending with the achievement of measurable student academic progress. Smart Score lists academic and spending ratings as low, average, or high. The district and campus Smart Score calculations use three-year averages to calculate more stable and consistent measures with less year-to-year volatility. The 2020 Smart Score rating results use data from school years 2016–17 to 2018–19.

FIGURE 3–4
KINGSVILLE ISD TAX RATE COMPARED TO PEER DISTRICTS SCHOOL YEARS 2017–18 TO 2020–2021

DISTRICT	2018–19	2019–20	2020–21
Kingsville ISD	**1.5189**	**1.5189**	**1.5189**
Alice ISD	1.33	1.2513	1.2571
Robstown ISD	1.665	1.568	1.5444
West Oso ISD	1.45	1.408	1.3002

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2017–18 to 2020–21.

FIGURE 3–5
KINGSVILLE ISD FIRST AND SMART SCORE RATINGS COMPARED TO PEER DISTRICTS (1)
SCHOOL YEAR 2019–20

DISTRICT	FIRST RATING (2)	SMART SCORE (3)	SMART SCORE ACADEMIC PERFORMANCE RATING	SMART SCORE SPENDING RATING
Kingsville ISD	**B=Passed**	**2.5**	**Very Low academic progress**	**Low spending**
Alice ISD	A=Superior	3	Very Low academic progress	Very Low spending
Robstown ISD	B=Passed	1.5	Very Low Academic progress	High spending
West Oso ISD	A=Superior	2.5	Low Academic progress	Average spending

NOTES:
(1)   FIRST=Financial Integrity Rating System of Texas.
(2)   School year 2020–21 data is the most recent data available for the FIRST ratings as of March 2022.
(3)   Smart Scores for calendar year 2020 are based on a three-year average and use data from school years 2016–17, 2017–18, and 2018–19.
SOURCES: Texas Education Agency, Financial Integrity Rating System of Texas, school year 2017–18; Texas Smart Schools Initiative, 2020 Smart Scores.

Figure 3–5 shows Kingsville ISD's FIRST and Smart Score ratings compared to peer districts. Kingsville ISD scored a FIRST rating of B/Passed for school year 2020–21, as did the peer district Robstown ISD; the other peer districts scored a FIRST rating of A/Superior. The district reports that Kingsville ISD's 2020–21 FIRST rating was due to a low student-to-staff ratio. The district's closure of two campuses should positively impact the upcoming 2021–22 FIRST Rating, which has not been released at the time of this publication. Kingsville ISD's 2020 Smart Score was 2.5, with a performance rating of very low academic progress and a spending rating of low. Kingsville ISD scored the lowest category of academic performance and the second lowest category of spending.

Kingsville ISD's purchasing requisition instructions, which the district provides on the Finance Department page of the district website to all campus and department staff, outlines the steps required to initiate a valid purchase order.

The district uses the financial management software E-Finance for its financial operations. The district uses this software's online requisition system for all purchases. Requestors enter purchase requests electronically, verify account balances, and select preapproved vendors at the point of data entry. For most purchases, the district has a delivery process wherein items are ordered when needed instead of on a regular schedule, and purchased items are stored at the campuses or departments in which the purchases originated.

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

DETAILED FINDINGS

BUDGET DEVELOPMENT (REC. 10)

Kingsville ISD's budget-development process does not effectively incorporate input from campus administrators and department heads, align with district and campus improvement plans, nor prepare long-term spending plans.

The district does not have a budget document that details the budget-development process. The district's budget calendar identifies key steps and dates in the budget-development cycle. **Figure 3–6** shows the Kingsville ISD's budget calendar for fiscal year 2022.

Based on the budget calendar and interviews with staff, the district's budget process begins with the Finance Department preparing a preliminary budget for each campus and department in April for the following school year. The budget for each campus and department is based on the previous school year's budget and informal conversations with principals and department heads about their campus and department needs. According to staff, the district has no formal process to identify long-term needs or to develop a budget plan to support those needs. The CFO consults with the superintendent and accounting supervisor to develop the budget. The CFO reports that the district holds budget workshops with the board prior to presenting the budget for approval in August. However, board members reported that they have little discussion or input on the budget and reported an overall lack of interest and training in financial matters concerning the district budget. During onsite interviews, district staff stated that community stakeholders also have little input in the development of the budget or district priorities. After the budget is approved, the CFO and accounting supervisor conduct individual training with

FIGURE 3–6
KINGSVILLE ISD BUDGET CALENDAR, REVISED JUNE 2021
FISCAL YEAR 2021–22

TARGET DATE	ACTIVITY/PROCESS	RESPONSIBILITY
2/22/2021	5:30 PM Review of building facility, vehicles, equipment, and technology needs	School Board, Senior Leadership
2/22/2021	5:30 PM Presentation of TASBO Financial Analysis	School Board, Senior Leadership
2/27/2021	Town Hall to discuss TASBO Financial Analysis and proposed district realignment	Senior Leadership
3/17/2021	Enrollment projections completed	Senior Leadership
3/23/2021	5:30 PM Budget update and board agenda item to approve district realignment	Senior Leadership
4/27/2021	5:30 PM Budget update and board agenda item to review stipends	Senior Leadership
4/30/2021	Preliminary property values received from county appraisal district	Senior Leadership
5/11/2021	5:30 PM Regular Board Meeting (Postpone Budget workshop at 4:00 PM)	School Board, Senior Leadership
5/11/2021	5:30 PM Budget update at board meeting	Senior Leadership
5/25/221	4:30 PM Budget Workshop to review ESSER III, Regular Board Meeting at 5:30 PM	School Board, Senior Leadership
6/1/2021	Budget process outlined to departments	Senior Leadership
6/7/2021	Budget process outlined to principals	Senior Leadership
6/8/2021	5:30 PM Budget update at board meeting	Senior Leadership
6/14/2021	Completion of department and campus budgets	Senior Leadership, Directors, Principals
6/14/2021	5:30 PM Budget workshop to review employee compensation and stipends	School Board, Senior Leadership
6/22/2021	5:30 PM Board meeting to approve employee compensation and stipends	School Board, Senior Leadership
7/20/2021	5 00 PM Budget workshop to review first draft of district budget	School Board, Senior Leadership
7/20/2021	6:00 PM Budget update, agenda item to decide on public meeting date on budget and proposed tax rate	School Board, Senior Leadership
7/26/2021	5.30 PM Budget workshop to finalize district budget	School Board, Senior Leadership
7/29/2021	Publish Notice of Public Meeting to Discuss Budget and Proposed Tax Rate in newspaper and post proposed budget on district website	Senior Leadership
8/5/2021	Deadline for TEA to issue maximum compressed tax rate	Senior Leadership
8/10/2021	5:00 PM Public budget hearing, discuss current property year values, budget approval, and tax rate adoption	School Board, Senior Leadership
8/11/2021	Post approved budget on district website	Senior Leadership

NOTES: TASBO=Texas Association of School Business Officials; ESSER=the federal Elementary and Secondary School Emergency Relief Fund grant program; TEA=Texas Education Agency.
SOURCE: Kingsville ISD, March 2022.

department heads and principals related to monitoring the budget and developing budget amendments. The Finance Department monitors department and campus budgets, prepares reports, and answers budget-related questions from departments and campuses.

A budget amendment must be initiated if a campus of department requires additional funds greater than the budgeted amount during the school year. Department heads and principals must submit a written request to the CFO explaining the need for additional funds. If approved, the CFO prepares an amendment for board consideration.

The district has prioritized adding as few budget amendments as possible.

Limiting principals' and department heads' involvement in the budget-development process, especially in long-term planning, impedes valuable input from those most familiar with daily operations. The resulting lack of involvement could lead to apathy toward budget administration and hinder stakeholders from providing information to district leadership.

District staff and board members also stated that the district does not use the district improvement plan (DIP) nor the

campus improvement plans (CIP) to guide the district budget. Separate from the district's budget process, Kingsville ISD annually develops a DIP, and each campus develops a CIP. These plans are intended to improve school performance by establishing annual goals, objectives, and strategies for the district and individual campuses based on analysis of student achievement, graduation rates, retention rates, and other federal and state accountability indicators. Some of these goals and strategies require funds to be accomplished, and the plans outline the expected funding sources. The campus and department funding established during the district's budget development process is not connected to the goals outlined in the DIP or CIPs. Instead, Kingsville ISD builds operating budgets based on previous school years' activities. Although no evidence shows that the district's budget and improvement plan goals contradict each other, making budgetary decisions that are not based on the student performance goals outlined in the DIP and CIPs could lead to inefficient and ineffective spending. Additionally, the failure to align resource allocation with improvement planning limits the improvement strategies that the district can implement.

Georgetown ISD publishes its Budget Guidelines, a document that contains the district's budget-development process, a budget-preparation overview, reference information, and budget codes. The guidelines include a budget calendar and enrollment projections that assist the district to develop a budget with as much information as possible in clearly identified steps. Carroll ISD also publishes its Budget Procedure Manual to guide the district in its budget development.

Kingsville ISD should develop and implement a budget-development process that aligns with district and campus improvement plans and incorporates input from campus administrators and department heads.

The CFO should develop written procedures to guide the budget-development process. TEA's FASRG provides extensive information regarding the entire budgeting process. The CFO should review the FASRG Financial Accounting and Reporting module to become familiar with all areas of the budgeting process. Using that knowledge, the district could develop written guidelines that establish procedures for budget planning, preparation, and monitoring.

The superintendent, in collaboration with the CFO, should modify the budget calendar so that it includes activities and completion dates that incorporate input from campus

administrators, department heads, and community stakeholders. According to the National Center for Education Statistics, the following three steps are best practices used to prepare a new budget calendar:

- determine the necessary level of detail;

- identify all the activities that must be included in the calendar and arrange them in chronological order; and

- assign completion dates to each activity on the calendar.

One example of a budget calendar that includes time for department and campus input is available on Austin ISD's website at https://www.austinisd.org/budget. The calendar assigns specific dates for budget-development activities and offers various opportunities for community involvement.

The CFO, campus administrators, and DIP and CIP committee members should develop and review Kingsville ISD's budget plan and improvement plans. The CFO should develop and implement a formal process to require that district and campus budgets include any resources and funding allocated to the goals and objectives of the DIP and CIP. As campus administrators and department heads review their budgets, they should identify and ensure that the DIP's and CIPs' goals and objectives are incorporated into the budget and should communicate long-term budget needs to the CFO. The CFO should collaborate with campus administrators and department heads to develop long-term spending plans for these needs. Additionally, as the board reviews and approves the district budget, board members should verify whether the costs of programs to meet the DIP and CIPs goals and objectives are included in the district budget.

The district could implement this recommendation with existing resources.

CONTRACT MANAGEMENT (REC. 11)

The district lacks a clearly defined contract-management function to ensure adequate administration, evaluation, and oversight of district contracts.

Board Policy CH (LOCAL) authorizes the superintendent to sign contracts and requires board approval for any budgeted purchase valued at $25,000 or more. District staff stated that the CFO and the superintendent are the only two staff who may sign contracts on the district's behalf.

The review team visited the district in March 2022. At the time of the onsite visit, the district purchased most goods and services through purchasing cooperatives and did not have many active contracts. During interviews, staff reported that they typically obtain three bids for a contracted service, and they share feedback regarding vendor performance informally with the CFO and accounting supervisor.

Kingsville ISD's Finance Department has developed an extensive Finance Manual and a State and Federal Grants Manual that provide details for district staff regarding several department functions. The district's Finance Manual includes sections on finance and budgeting, accounts payable, payroll, purchasing and warehouse guidelines, management information system instructions, student activity funds, and district forms. The State and Federal Grants Manual specifies procedures related to types of grants, budgeting grant funds, procurement standards, property standards and management, compensation and benefit costs, and financial monitoring and reporting. Although the Finance Manual contains general guidelines for purchasing, it does not provide sufficient guidance regarding contract management. This lack of direction has resulted in ineffective processes for administering and managing awarded contracts.

For example, the district does not have a master contract file in a central location where all contracts are kept. The district also does not have a designated contract manager; instead, principals and department heads oversee contracts managed by their respective campuses or departments. In interviews, staff said that they did not know where the printed copies of contracts for their departments or campuses were located. Staff reported that the district does not use an electronic system to track the expiration of contracts nor provide a formal method of reporting feedback on contract performance.

The lack of a centralized, master file of original contracts exacerbates the risk that the district has contracts of which Finance Department staff are unaware, and the CFO and superintendent do not have immediate access to all original contracts. Additionally, the district lacks a process for reviewing contracts. The district has no procedures to request or document vendor performance. Kingsville ISD also does not maintain a contract renewal calendar; therefore, it does not have a process to notify staff when contracts are set to expire.

The district's failure to monitor contracts for compliance and to conduct cost-benefit analyses on renewals increases the risk of overspending on services and not receiving the best value for district investments. By not documenting and monitoring contract and vendor performance appropriately, the district might not have access to legal remedies against breach of contract, unsatisfactory performance by a vendor, or any other loss to the district resulting from a service contract or provider.

The Texas Comptroller of Public Accounts publishes the *State of Texas Procurement and Contract Management Guide*, which provides a framework for government procurement that applies to all governmental entities, including school districts. According to the guide, each contract the district enters with a vendor should be overseen by an assigned contract manager. A contract manager's primary responsibilities include the following tasks:

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

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

- managing any district property used in contract performance (e.g., computers, telephones, identification badges);

- implementing a quality-control and contract-monitoring process;

- monitoring the contractor's progress and performance to ensure goods and services procured comply with the contract requirements and keeping timely records;

- consulting with the district's legal counsel to address concerns or issues;

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

- inspecting and approving the products or services by submitting a written document accepting the deliverables or obtaining documentation from the end users for receipt that inspection and approval have been completed;

- verifying accuracy of invoices and authorizing payments consistent with the contract terms;

- monitoring the contract budget to ensure that sufficient funds are available throughout the term of the contract;

- identifying and resolving disputes with the contractor in a timely manner;

- exercising remedies available to the district, as appropriate, when a contractor's performance is deficient;

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

- confirming that all products or services have been delivered and delivery is completed before the contract's expiration date; and

- performing contract closeout processes by ensuring that the district's contract file contains all necessary documentation.

Without contracting guidance from the Finance Department, staff entering into contracts throughout the district may not be performing these duties adequately. The absence of formal policies, processes, and procedures for large and small contracts places the district at risk for rising costs and poor-quality services or products. The district also risks inadvertent noncompliance with records retention requirements pursuant to the Texas Education Code, Section 44.003, which requires district superintendents to "ensure that records are kept and that copies of all budgets, all forms, and all other reports are filed on behalf of the school district at the proper times and in the proper offices as required."

Kingsville ISD should implement controls to improve contract-management functions.

The CFO should perform the following tasks:

- establish a central file in the Finance Department of all original contracts and stipulate the retention period for each type of contract based on the records retention schedules adopted by the Texas State Library and Archives Commission;

- assign a contract manager to each contract and require that individual to sign an agreement stating an understanding of the role and responsibilities as outlined in the *State of Texas Procurement and Contract Management Guide*;

- establish a procedure for the contract manager to monitor all contracts and perform a cost-benefit analysis evaluation before renewing contracts; and

- include in the district's completed Finance Manual the evaluation of contractors, the steps for notifying a vendor when performance is substandard, and the steps for terminating a vendor contract when remedies have been unsuccessful.

The district could implement this recommendation with existing resources.

SEGREGATION OF DUTIES (REC. 12)

Kingsville ISD lacks effective internal controls and segregation of duties in the human resources and payroll functions.

Board Policy CAA (LOCAL) states that "The Superintendent or designee shall maintain a system of internal controls to deter and monitor for fraud or financial impropriety in the District." Segregation of duties refers to a measure of control in which no position is responsible for more than one related task. Segregation of duties provides an important and effective internal control for school districts. This control involves separation of the initiation, approval, recording, and reconciling responsibilities for transactions.

The Kingsville ISD Finance Manual's payroll section assists district staff in completing procedures related to time sheets and employee income tax withholding (e.g., W-4) forms. The manual does not include Finance Department procedures for payroll, and the district has no human resources (HR) procedures manual. The manual also does not include procedures to ensure that finance and HR tasks are separated appropriately. The payroll clerk in the Finance Department prepares payroll and submits it to the accounting supervisor for approval. The accounting supervisor compares the payroll amount to the previous month and analyzes any differences. According to interviews with staff, differences in payroll amounts from month to month typically involve overtime and extra-duty pay. Finance Department staff prepare and complete payroll, and both Finance and HR Department staff can access and edit staff records. In addition to the HR specialists, the payroll specialist and the accounting supervisor can edit staff salary information. These Finance Department staff also may be able to add new staff entries into the payroll module of the district's financial system; however, it is unclear from interviews if this is the case. Some interviews

indicated that HR and Finance Department staff both could add new staff entries, and some staff said only HR staff could add staff entries.

The review team did not identify examples of irregularities nor signs of fraud, theft, or financial impropriety on the part of Finance or HR departments' staff. However, the district may lack internal controls to prevent such activity. If some staff can both enter staff in the system and process payments, then it is possible for them to enter fictitious staff in the payroll system and send payments to personal bank accounts. Staff also could increase the rate of pay of existing staff without proper authorization.

The American Payroll Association states that one of the most important internal controls in the payroll department is separation of duties. The organization advises that the payroll administrator should not be responsible for entering staff information into a payroll system nor editing staff information. In the publication *Payroll and HR: Identifying Responsibilities and Working Together*, the Texas Association of School Boards (TASB) states that the HR department is responsible for entering and updating employee records in the HR/payroll system, while payroll's function primarily is to generate staff paychecks that are accurate and complete. TASB recommends that segregation of duties be placed to prevent staff in HR or payroll from both entering staff records and generating payments. This arrangement prevents payroll from making pay changes without authorization and prevents HR from accessing payroll funds. Additionally, errors can be detected more easily when payroll and HR check each other's work.

Kingsville ISD should review the roles, responsibilities, and duties of district staff, and develop a system enabling the segregation of their duties relating to the payroll function to ensure effective internal controls to prevent fraud, theft, and financial impropriety in accordance with board policy.

The CFO and HR director should collaborate to determine the appropriate staff responsible for entering and updating staff information in district records, and the appropriate staff for generating payroll. After they identify the staff responsible for those duties, the CFO and HR director should ensure that those staff have credentials within the district's financial management system for only those areas.

Since the time of the review, district staff reports that the Finance Department has a payroll procedures manual and the Human Resources Department has a separate procedures

manual, however the district did not provide documentation of these manuals.

The district could implement this recommendation with existing resources.

INVENTORY MANAGEMENT (REC. 13)

Kingsville ISD does not have a districtwide process to tag and inventory capital assets that are not related to technology.

Board policy CFB (LEGAL) directs the district to maintain inventories of its assets. According to TEA's FASRG, the Governmental Accounting Standards Board's Statement No. 34: Basic Financial Statements—and Management's Discussion and Analysis—for State and Local Governments defines capital assets as having the following qualities:

- tangible or intangible;

- used in operations; and

- have a useful life of more than one year.

The FASRG also states that a district's capital assets can include land, land improvements, land use rights, buildings and building improvements, construction work in progress, furniture and equipment, vehicles, machinery and equipment, works of art and historical treasures, monuments, infrastructure, computer software, and commercially available software.

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

- identify and resolve discrepancies between the capital asset inventory list and what is in the district's possession;

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

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

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

- asset purchased;

- date of purchase, construction, or acquisition;

- price paid to acquire and place the asset;

FIGURE 3–7
KINGSVILLE ISD DEPRECIATION SCHEDULE EXCERPT
AUGUST 31, 2020

ASSET TAG #	ACQ DATE	ASSET DESCRIPTION	EST LIFE	DEPR LIF MO	SALVAGE VALUE	INITIAL COST	ADDITIONS	RETIREMENTS	BALANCE 8/31/2020
100001	4/18/01	MACHINERY, ALIGNMENT LIFE CHAL	10			$9,571.41			$9,571.41
2000013	8/31/02	APPLIANCE, DISHWASHER HOBART	10			$10,131.00			$10,131.00
2000014	8/31/02	APPLIANCE, DISHWASHER HOBART	10			$10,131.00			$10,131.00
9802715	7/13/98	APPLIANCE, STEAM TABLE	10			$5,000.00			$5,000.00
9802725	7/13/98	APPLIANCE, STEAM TABLE	10			$5,000.00			$5,000.00
9802726	7/13/98	APPLIANCE, STEAM TABLE	10			$5,000.00			$5,000.00
9802727	7/13/98	APPLIANCE, OVEN VULCAN	10			$5,000.00			$5,000.00
9802729	7/13/98	APPLIANCE, OVEN VULCAN	10			$5,000.00			$5,000.00
9802965	7/8/98	APPLIANCE, OVEN ECCO S11 LANG	10			$6,500.00			$6,500.00
9802966	7/8/98	APPLIANCE, OVEN ECCO S11 LANG	10			$6,500.00			$6,500.00
9802967	7/8/98	APPLIANCE, STEAM TABLE	10			$7,000.00			$7,000.00
9802969	7/8/98	APPLIANCE, STEAM TABLE	10			$7,000.00			$7,000.00
9802984	7/8/98	APPLIANCE, OVEN 2 DR BLODGETT	10			$5,100.00			$5,100.00

SOURCE: Kingsville ISD, March 2022.

- expected useful life and disposal date of the asset;

- location of the asset;

- inventory number or identification code for moveable items; and

- fund from which the asset was purchased.

The district's Finance Manual contains no guidelines for how to document or inventory capital assets. District staff stated that the district's only capital assets are technology items and vehicles, and that they have a process for tagging technology assets and inventorying vehicles by their vehicle identification number. However, Kingsville ISD Board Policy CFB (LOCAL) states that the capitalization threshold for purposes of classifying capital assets is $5,000. Kingsville ISD's asset depreciation schedule shows many non-technology items valued at amounts that exceed the capitalization threshold and includes information for capital assets such as buildings,

appliances, and equipment. This list shows that Kingsville ISD does not have a districtwide process to track capital assets in accordance with FASRG requirements. The schedule includes the asset tag identification number, acquisition date, asset description, estimated life, initial cost, and value balance, but it does not include the location of the asset or the fund from which it was purchased. Furthermore, the current balances all appear to be the same as initial cost valuations, regardless of the assets' ages. **Figure 3–7** shows an excerpt from the depreciation schedule.

The Finance Department does not conduct an annual inventory. According to the CFO, each district department is responsible for conducting its own inventory. However, the Finance Department does not monitor department inventory processes and does not have a central inventory of all district assets other than the depreciation schedule, which does not contain adequate information for monitoring inventory. In

the absence of a centralized monitoring process for annual inventories, the district cannot hold campuses, departments, or staff accountable for the safeguarding of district property.

Identifying assets purchased with federal funding is a requirement of most grant awards that follow federal Education Department General Administrative Regulations. TEA has developed specific requirements for the disposal of these types of assets in the FASRG, which states that a school district's purchasing manual should address disposal of obsolete and surplus property. Without an effective inventorying process, the district is unable to ensure that assets purchased with federal funds are disposed of properly.

Kingsville ISD's Finance Department should develop procedures to inventory and tag all district capital assets.

The CFO should establish a process during the receipt of goods for tagging capital assets that involves the use of differentiated tags for assets purchased with federal funding. The CFO also should conduct the initial inventory of assets at the end of the school year, during which staff should tag the assets, note their location, and identify any assets that should be removed from the lists or are not located. Campuses and departments should conduct periodic inventories thereafter, with occasional auditing by the Finance Department.

Since the time of the review, the district reports that they established a process and documented procedures for tagging and inventorying capital assets, however the district did not provide documentation of these procedures.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

PAPER PROCESSES

The Kingsville ISD Finance Department uses paper-based office processes, including paper documentation and checks for all payments, which are labor-intensive and costly. The district should analyze the benefits and cost savings of paying for purchases electronically wherever possible, scanning documentation for requisitions, and examining possible duplicative staff responsibilities.

FINANCE DEPARTMENT PROCEDURES MANUAL

Kingsville ISD board policies govern the district's business operations, and the Finance Department publishes a Finance Manual that includes several instructional guides for district staff. However, the district does not have comprehensive, written procedures to guide Finance Department staff in performing their daily jobs. Business operations consist of many functions, which include purchasing, payroll, accounts payable, budgeting, and general accounting. When procedures are not written, responsibilities are not well-documented, and the district's ability to manage staff is hampered. Procedures aligned with job descriptions and personnel evaluations form the basis for holding employees accountable for their responsibilities.

In addition, written procedures are essential for managing emergencies, unforeseen absences, transitions between staff, and succession planning. Without written procedures, it is more difficult for the district to ensure that Finance Department processes could continue uninterrupted when performed by substitute or new staff. Written procedures also provide the basis for managing process improvements. When a process or procedure changes, written revisions help communicate the change to staff and facilitate training to support the change. The CFO and other key stakeholders should develop administrative procedures regarding all Finance Department duties for use by the department's staff and should review and revise these procedures periodically or whenever significant changes occur.

CLOSED CAMPUSES

District staff reported that unused, or excess, assets are stored in closed campuses. The district no longer carries insurance on these properties, despite storing district assets in them and authorizing staff to enter the campuses to remove assets. The review team received reports of a staff injury occurring while accessing a closed campus to retrieve stored equipment. The CFO should find another location to store the assets or determine the value of assets stored in the closed campuses and the insurance needed to protect the assets.

FISCAL IMPACT

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

Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address the findings.

4. HUMAN RESOURCES MANAGEMENT

ACCOMPLISHMENT

♦ Kingsville ISD's Human Resources Department has developed and implemented an effective and efficient process for conducting staff evaluations.

FINDINGS

♦ Kingsville ISD's Human Resources Department maintains inefficient manual processes.

♦ Kingsville ISD's compensation-management function is not organized to maximize efficiency.

♦ Kingsville ISD lacks a process to evaluate the effectiveness and efficiency of its human resources operations.

♦ Kingsville ISD does not have written procedures for all human resources functions.

RECOMMENDATIONS

♦ **Recommendation 14: Upgrade or integrate electronic systems and streamline human resources processes to increase efficiency and improve data integrity.**

♦ **Recommendation 15: Restructure the compensation-management process to include the Human Resources Department.**

♦ **Recommendation 16: Develop annual goals for each human resources activity and establish performance measures to evaluate the effectiveness of the human resources function overall.**

♦ **Recommendation 17: Develop and implement written procedures for its Human Resources Department.**

BACKGROUND

Human resources (HR) management includes compensation, recruitment, hiring and retention, records management, staff relations and grievance processes, and staff performance evaluations. These activities are defined either by compliance-based or strategic-based responsibilities. Compliance-based responsibilities include assuring that an organization is following federal, state, and local labor laws in areas such as

FIGURE 4–1
KINGSVILLE ISD'S HUMAN RESOURCES DEPARTMENT ORGANIZATION
SCHOOL YEAR 2021–22
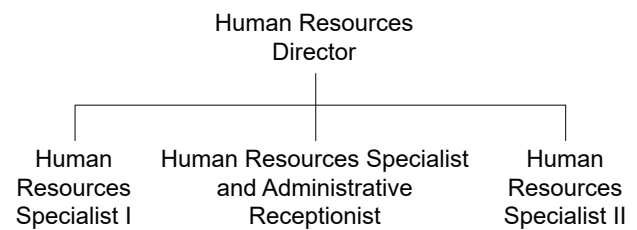
NOTE: Since the review team's onsite visit, Kingsville ISD staff reported that the district has changed the title of the Human Resources Director to the Executive Director of Human Resources.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

benefits, compensation and hours worked, records management, mandatory leave, discrimination, medical privacy, safety, termination, and eligibility to work. Strategic-based responsibilities include recruitment and retention, compensation and benefits, and staff relations.

Kingsville Independent School District's (ISD) HR Department consists of four staff, which includes the HR director, an HR specialist I, an HR specialist II, and an HR specialist and administrative receptionist. These staff total 3.5 full-time-equivalent (FTE) positions because some of the administrative receptionist's duties are not related to the HR function. All HR staff report to the HR director, and the HR director reports directly to the superintendent. **Figure 4–1** shows the organization of Kingsville ISD's HR Department.

The district's HR functions are dispersed among several departments. **Figure 4–2** shows the department assigned roles and responsibilities related to the district's HR activities during school year 2021–22.

As shown in **Figure 4–2**, most of the district's HR functions are managed and overseen by the HR Department, however several responsibilities are carried out by the Finance Department and the Curriculum and Instruction Department.

During school year 2021–22, Kingsville ISD employed 457.5 FTE positions to provide services to 2,805 students. The number of district employees has decreased by 10.6

FIGURE 4–2
KINGSVILLE ISD'S HUMAN RESOURCES ACTIVITIES BY DEPARTMENT, SCHOOL YEAR 2021–22

HUMAN RESOURCES ACTIVITY	POSITION RESPONSIBLE
Recruiting new employees	Human Resources (HR) Department
Maintaining posted vacancy lists and operating a system to process and track applications	HR Department
Overseeing the interviewing and selection of new employees	HR Department
Establishing strategies for retention	HR Department and Superintendent
Orientation of new employees and processing their employment entry information	HR Department and Finance Department
Processing promotions and transfers	HR Department
Directing staff exiting and resignation procedures	HR Department
Determining salaries and maintaining compensation schedules	Chief financial officer (CFO) and Superintendent(1)
Conducting salary and compensation marketability research	CFO and Superintendent
Planning and forecasting staffing needs	HR Department and CFO
Maintaining complete employee records and files and ensuring their security	HR Department
Directing and monitoring the employee benefits program	Finance Department
Worker's Compensation	Finance Department
Developing and maintaining job descriptions	HR Department
Managing the employee evaluation and appraisal process	HR Department and Curriculum and Instruction Department
Recording employee complaints and grievances	HR Department
Developing employee policies and accompanying procedures for implementation	HR Department
Ensuring the district's compliance with employee-related laws and regulations	HR Department
Overseeing District Staff Professional Development	Curriculum and Instruction Department and department heads (2)

NOTES:
(1)   Since the review team's onsite visit, Kingsville ISD staff reported that the district has included the HR Department in the process of determining salaries and maintaining compensation schedules.
(2)   Since the review team's onsite visit, Kingsville ISD staff reported that the district has reassigned responsibility for overseeing district staff professional development to the HR Department and the district's Professional Development Committee.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

percent in the last five years. The decrease is partially a result of the district closing two campuses after school year 2020–21. Although the district retained most staff from the closed campuses, Kingsville ISD's total FTE positions decreased by 5.1 percent from school years 2020–21 to 2021–22. Student enrollment decreased at a greater rate than total staff, recording an overall 17.3 percent decrease during the past five years. **Figure 4–3** shows the total FTE positions in Kingsville ISD from school years 2018–19 to 2021–22.

As shown in **Figure 4–3**, the total FTE positions in all Kingsville personnel groups have decreased during the last five school years except for auxiliary staff. The personnel group with the largest percentage decrease was educational aides.

Figure 4–4 shows data for Kingsville ISD's HR Department staffing compared to its peer districts. Peer districts are districts similar to Kingsville ISD that are used for comparison purposes. The peer districts for Kingsville ISD are Alice ISD, West Oso ISD, and Robstown ISD.

As shown in **Figure 4–4**, Kingsville ISD has the second-lowest HR staff-to-student ratio per 100 students and HR staff-to-employee ratio per 100 staff compared to peer districts. Overall, Kingsville staffing is comparable with two of its peer districts. The district's HR staffing ratio also aligns with industry standards. According to the Bloomberg Bureau of National Affairs' 2017 HR Department Benchmark and Analysis report, the best practice ratio is 1.4 full-time HR staff per 100 employees.

FIGURE 4–3
KINGSVILLE ISD FULL-TIME-EQUIVALENT POSITIONS, SCHOOL YEARS 2017–18 TO 2021–22

POSITIONS	2017–18	2018–19	2019–20	2020–21	2021–22	PERCENTAGE CHANGE ACROSS 5 YEARS
Total Teaching Staff	241.7	206.8	202.8	210.7	205.4	(15.0%)
Total Auxiliary Staff	129.7	120.5	149.9	152.6	147.0	13.3%
Total Educational Aides	73.9	63.5	68.4	62.5	49.6	(32.9%)
Total Professional Support Staff	43.2	34.0	29.1	32.2	33.4	(22.7%)
Total Administrative Staff	23.1	19.5	23.0	23.1	22.0	(4.8%)
Total Personnel	511.6	444.3	473.1	481.2	457.5	(10.6%)
Total Student Enrollment	3,392	3,316	3,102	2,861	2,805	(17.3%)

NOTE: Amounts for the Total Personnel category may not sum due to rounding.
SOURCES: Texas Education Agency, Texas Academic Performance Reports, school years 2017–18 to 2020–21; Texas Education Agency Public Education Information Management System, Staff Salaries and Full-time-equivalent Position Counts, school year 2021–22; Texas Education Agency Student Enrollment Reports, school years 2017–18 to 2021–22.

FIGURE 4–4
KINGSVILLE ISD HUMAN RESOURCES (HR) STAFFING COMPARED TO PEERS
SCHOOL YEAR 2021–22

DISTRICT	HR DEPARTMENT POSITIONS	STUDENT ENROLLMENT	HR STAFF PER 100 STUDENTS	TOTAL STAFF	HR STAFF PER 100 STAFF
Kingsville ISD	**3.5**	**2,805**	**8.0**	**457.5**	**1.3**
Alice ISD	5.5	4,369	7.9	715.7	1.3
West Oso ISD	1.5	1,969	13.1	329.4	2.2
Robstown ISD	3.0	2,480	8.3	419.2	1.4

SOURCES: Texas Education Agency Student Enrollment Reports, school year 2021–22; Texas Education Agency, Public Education Information Management System, Staff Salaries and Full-time-equivalent Position Counts, school year 2021–22.

Figure 4–5 shows Kingsville ISD's budgeted payroll expenditures for all funds compared to its peer districts during school year 2021–22.

As shown in **Figure 4–5**, payroll expenditures for all four districts ranged from approximately $15.4 million to $37.1 million. Kingsville ISD's payroll accounted for 64.0 percent of its total expenditures, which is the second-highest among peer districts.

Figure 4–6 shows the distribution of staff in six categories for Kingsville ISD compared to those of its peer districts.

As shown in **Figure 4–6**, Kingsville ISD employed the largest percentage of campus administrators and the second-smallest percentage of auxiliary staff among its peers.

Figure 4–7 shows the student-to-teacher and student-to-staff ratios for Kingsville ISD, its peer districts, the average of all districts served by regional Education Service Center II (Region 2), and the state average.

Kingsville ISD has a student-to-teacher ratio of 13.7, which is second-lowest among its peers and less than those of Region 2 and the state. Kingsville ISD also has a student-to-staff ratio that is tied for highest among its peers but is less than those of Region 2 and the state.

Kingsville ISD's staff recruitment process consists of posting jobs on the district's website and the Region 2 website. The district also attends job fairs throughout South Texas. During school year 2021–22, the district sent staff to recruit potential bilingual teachers in Mexico. The district provides a financial bonus to bilingual, special education, math, and science teachers who sign contracts. The district also contracted with the Texas Association of School Boards (TASB) to conduct a salary survey to ensure that the district's compensation packages are competitive with those at surrounding districts.

To retain staff, the district provided a stipend of $500 to teachers who were employed by the district during school year 2020–21 and returned for school year 2021–22. District administrators awarded another $1,000 stipend to staff who

FIGURE 4–5
KINGSVILLE ISD AND PEER DISTRICTS' BUDGETED PAYROLL EXPENDITURES FOR ALL FUNDS, SCHOOL YEAR 2021–22

CATEGORY	KINGSVILLE ISD	WEST OSO ISD	ROBSTOWN ISD	ALICE ISD	PEER DISTRICT AVERAGE
Total expenditures	**$36,165,192**	$25,238,507	$34,765,407	$51,645,813	$37,216,576
Payroll expenditures	**$23,140,577**	$15,390,204	$22,107,494	$37,081,295	$24,859,664
Payroll as a percentage of total expenditures	**64.0%**	61.0%	63.6%	71.8%	66.8%

Sources: Texas Education Agency, Public Education Information Management System, Budgeted Financial Data; Texas Academic Performance Report, school year 2021–22.

FIGURE 4–6
KINGSVILLE ISD PERCENTAGE OF STAFF POSITIONS COMPARED TO PEER DISTRICTS, SCHOOL YEAR 2020–21

CATEGORY	KINGSVILLE ISD	WEST OSO ISD	ROBSTOWN ISD	ALICE ISD
Teachers	**43.8%**	45.9%	38.2%	42.2%
Auxiliary staff	**31.7%**	32.1%	32.3%	28.6%
Educational aides	**13.0%**	8.8%	14.4%	12.8%
Professional support	**6.7%**	8.8%	10.4%	11.2%
Campus administration	**3.7%**	2.9%	3.3%	3.2%
Central administration	**1.1%**	1.6%	1.5%	1.9%

Source: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

FIGURE 4–7
KINGSVILLE ISD STUDENT-TO-TEACHER AND STUDENT-TO-STAFF RATIOS COMPARED TO PEER DISTRICTS, REGION, AND STATE, SCHOOL YEAR 2021–22

DISTRICT/AREA	STUDENT-TO-TEACHER RATIO	STUDENT-TO-STAFF RATIO
Kingsville ISD	**13.7**	**6.1**
West Oso ISD	12.9	6.0
Robstown ISD	15.2	5.9
Alice ISD	14.7	6.1
Region 2 (1)	14.4	6.7
State	14.7	7.2

Note: (1) Region 2=regional Education Service Center II.
Sources: Texas Education Agency, Student Enrollment Reports, school year 2021–22; Texas Education Agency, Staff Salaries and Full-time-equivalent Position Counts Report, school year 2021–22.

FIGURE 4–8
KINGSVILLE ISD TEACHER TURNOVER RATE COMPARED TO PEER DISTRICTS, REGION, AND STATE SCHOOL YEAR 2020–21

DISTRICT	TEACHER TURNOVER RATE
Kingsville ISD	**11.2%**
West Oso ISD	22.7%
Robstown ISD	19.5%
Alice ISD	21.2%
Region 2 (1)	15.3%
Statewide	14.3%

Note: (1) Region 2=Regional Education Service Center II.
Source: Texas Education Agency, Texas Academic Performance Report, school year 2020–21.

remain employed with the district through the end of the school year 2021–22.

Staff reported that Kingsville ISD has a low staff turnover rate. Staff said that the district faces challenges recruiting math, science, and elementary teachers but has been successful retaining teachers when they are hired. **Figure 4–8** shows the district's teacher turnover rate for school year 2020–21 compared to peer districts, Region 2, and the state.

Kingsville ISD's teacher turnover rate is significantly less than its peers and is less than both Region 2 and the state.

DETAILED ACCOMPLISHMENT

EVALUATIONS

Kingsville ISD's HR Department has developed and implemented an effective and efficient process for conducting staff evaluations.

The district's Curriculum and Instruction Department is responsible for overseeing the evaluation of all teachers and principals. However, the district's HR Department is tasked with ensuring that all other district employees are evaluated annually. The district has developed a timeline of when all nonteaching staff should be evaluated and when the evaluations must be submitted to the HR Department. This timeline is distributed to each department head and campus administrator annually.

The HR Department also developed individual evaluation tools for each position title that are based on their job descriptions. The evaluation forms enable the supervisor and employee to list goals and performance measures that are associated with positions. These forms are the same for each position title regardless of campus.

The HR Department provides trainings on evaluations each year for supervisors that shows them how to use the evaluation tools and how to establish employee goals and performance standards. HR staff maintain evaluation checklists for all positions in the district that are updated as each evaluation is submitted. During school years 2019–20 and 2020–21, all annual evaluations of noninstructional staff and principals were completed and submitted to the HR Department.

DETAILED FINDINGS

MANUAL PROCESSES (REC. 14)

Kingsville ISD's HR Department maintains inefficient manual processes.

Despite owning licenses for various administrative software systems, many of the district's HR processes are not digitized and require paper-based processes to complete. Reliance on manual processes results in increased inefficiency and undue burdens on staff. The following examples exhibit the district's paper-intensive processes:

- personnel records – All the district's personnel records are maintained in paper form in filing cabinets inside the HR Department's office space. HR staff update personnel files periodically by printing and filing any change in an employee's contract, evaluations, teaching service records, certifications, or payroll withholdings. HR staff said that maintaining physical personnel files and keeping those files secure are laborious and time-intensive tasks. Staff said that administrators have discussed digitizing the personnel records, but the process has not been implemented;

- evaluations – The annual evaluations of all Kingsville ISD staff are conducted using paper forms that are submitted manually to the HR Department to be filed;

- absences and substitutes – Kingsville ISD uses an automated software application to manage the district's absences and substitutes. The application enables teachers to schedule absences and place substitutes electronically. However, the application does not integrate with the district's financial management application. As a result, all recorded absences and subsequent substitute timesheets must be printed out and submitted manually to the HR Department. Staff then enter the information manually into the district's financial management application for payroll purposes. The HR specialist and administrative receptionist reported that the task of entering this information requires a large amount of work time to complete;

- timesheets – Nonexempt employees at Kingsville ISD use a separate time-management system to clock in and out each day. However, the system does not integrate with the district's financial management application. Timesheets for all nonexempt employees must be printed and submitted manually to the HR Department. Staff then enter the information manually into the district's financial management application for payroll purposes; and

- hiring process – As part of Kingsville ISD's hiring process, a supervisor who recommends hiring an applicant assembles a packet of information about the candidate that includes names of staff that were on the interview committee, which candidates were interviewed, and four reference checks. The packet is printed and physically submitted to the HR Department for filing. Staff reported in March 2022 that the district intended to implement an electronic job application and hiring system, but they did not know if the new system would enable submitting the recommendation packet to the HR Department electronically. Since the time of the review, Kingsville ISD staff indicated that the district has implemented an electronic job application and hiring system which enables supervisors recommending an applicant for hire to submit the recommendation packet to the HR Department electronically. Many of the paper-intensive processes in the district are a result of the

use of software systems that do not integrate with each other. HR staff said they were unaware of any attempts to determine whether current systems could integrate with or replace others. For example, the district's financial management software application has a time-management module; however, the district has not investigated whether this module could replace its current time-management system.

Manual processes can be cumbersome to use and result in inefficiencies and increased security and data-entry risks. For example, duplicate entry of employee information into multiple systems increases the likelihood of data-entry errors and is an inefficient use of staff time. Furthermore, a paper-only personnel records system increases security risks, because printed documents can be lost, misplaced, or damaged.

In interviews, staff said they believed Kingsville ISD's HR Department was understaffed. However, as shown in **Figure 4–7**, the district's HR Department is within industry staffing standards and is staffed similarly to those of its peer districts. Eliminating the paper-intensive processes in the department would improve the efficiency of departmental operations and provide staff time for other tasks.

Kingsville ISD should upgrade or integrate electronic systems and streamline HR processes to increase efficiency and improve data integrity.

The HR director should collaborate with the director of technology and communication to conduct a cost-benefit analysis of replacing paper-based personnel files with an electronic personnel files system. Maintaining electronic files mitigates some of the risks associated with processing and storing paper files. Converting these processes to an electronic system could enable the district to control access to the files more efficiently, eliminate redundancies in departmental operations, and conserve storage space.

The HR director also should collaborate with the director of technology and communication to determine the compatibility of the district's software systems for absence and substitutes, time management, and financial management. The director of technology and communication should determine whether these systems can integrate. If the systems cannot integrate, the director of technology and communication should determine if upgrading the district's financial management application would enable the district to discontinue the use of one or both of the other systems. If systems can be integrated, then the director of technology

and communication should train HR staff on how to upload data from one system to another.

The cost to digitize the district's personnel records cannot be determined until the district obtains quotes from vendors to determine which vendor offers services that best fit the district's needs. Similarly, upgrading the district's financial management application or purchasing additional applications will require a cost; but this amount cannot be estimated until the district determines which application upgrades are available and which additional applications to purchase.

COMPENSATION MANAGEMENT (REC. 15)

Kingsville ISD's compensation-management function is not organized to maximize efficiency.

As shown in **Figure 4–2**, Kingsville ISD's CFO and superintendent are responsible for determining salaries, maintaining compensation schedules, and conducting salary and compensation marketability research. The HR Department does not have a role in these functions, despite the HR director's job description listing the following as two of the position's major responsibilities:

- administer the teacher salary schedule and ensure compliance with the state minimum salary schedule requirements; and

- provide cost analysis of salary and wage adjustments for the budgeting process.

The Legislative Budget Board's School Performance Review Team visited the district in March 2022. During interviews, staff said that the superintendent assigned these responsibilities to the Finance Department after discussions with Finance Department staff.

The Texas Administrative Code, Title 19, Part 2, Section 153.1021, establishes a state minimum salary schedule that public school districts must implement for specific education professionals: classroom teachers, full-time librarians, full-time counselors, and full-time school nurses who are registered nurses. The statute sets no state minimum salary for other positions.

Effective districts base compensation for district positions on market competitiveness and equity among district staff. District operational positions typically are compared to the local market to determine competitive pay for similar positions. The major components of compensation

management include defining and evaluating jobs, establishing pay rates and ranges for jobs, determining the proper compensation level for employees, and administering various aspects of the program.

The exclusion of the HR Department from the compensation-management process can result in inefficiencies. For example, one aspect of compensation management is defining and evaluating jobs. Job evaluation is the systematic process of determining the relative value of different jobs in an organization. The goal of job evaluation is to compare positions with each other to develop a pay structure that is fair, equitable, and consistent for all positions. In Kingsville ISD, the HR Department is responsible for maintaining district job descriptions, one of the key elements of job evaluation that includes understanding the responsibilities delegated to each position within the district. Excluding the HR director from the task of defining and evaluating jobs prevents one of the most knowledgeable positions in the district from assisting in the process.

Similarly, the HR Department is tasked with overseeing employee staffing. The HR director annually sets the staffing ratios for each campus and department based on staffing levels of districts in the surrounding areas. To add a new position, a department or campus must submit the request to the HR Department for review before it is sent to the superintendent for approval. The HR Department's staffing decisions must consider staff salaries; however, the department is not involved in the process of determining those salaries.

More examples of inefficiencies are present in Kingsville ISD's compensation-management process, including two studies for which the district contracted in school year 2021–22. The district contracted with TASB in July 2021 to conduct a pay system review. Pay system reviews provide districts with an analysis of their pay structures relative to regional markets and provide strategic recommendations to eliminate any discrepancies found through that analysis. Staff reported that the intended purposes of the pay system review were to improve compensation and retention for current staff and to enhance recruitment efforts amid labor shortages. According to staff, the CFO and the superintendent contracted with TASB to conduct the survey without informing or consulting with the HR director. As a result, the HR director made staffing recommendations and approvals throughout the school year without having all the available data to make the most effective and efficient decisions. Additionally, the Kingsville ISD HR Department is responsible for overseeing the retention and recruitment

processes; however, staff said the department was not provided the results of the review to improve these functions.

The district also contracted with TASB to conduct a staffing review during summer 2022. A staffing review examines a district's current staffing practices within the context of the district's needs and priorities. The review collects input from principals and department heads, examines class loads and schedules, compares staffing to peer districts and state data, and provides detailed suggestions to achieve optimal staffing efficiency and effectiveness. The HR director, who sets staffing levels for the district, reported that he was not aware of the staffing study until after the district entered the contract.

The fragmenting of HR functions at Kingsville ISD also may result in the district underutilizing HR Department staff. Some school districts maintain a small number of HR staff and assign HR duties to other departments to reduce district costs. However, as shown in **Figure 4–4**, Kingsville ISD's HR Department is staffed at levels comparable to its peers and industry best practices. All three of its peer districts either assign their HR departments the responsibility of determining staff compensation or the process is collaborative between the HR and finance departments. Maintaining a fully staffed HR department and assigning HR responsibilities such as compensation management to other departments may be a poor use of district resources.

Kingsville ISD should restructure its compensation-management process to include the HR Department.

The district's compensation-management process should be collaborative and include the superintendent, CFO, and HR director. They should begin by clearly defining the various components of the process and assigning the responsibilities accordingly, including the following activities:

- defining and evaluating positions – determine the relative value of various positions within the district by examining the duties assigned in job descriptions;

- determining a position's market value – determine a position's dollar value in the external marketplace by collecting compensation data from similar positions in nearby school districts. Through combining the information obtained from the job-evaluation process and the market-valuation process, positions can be assigned to appropriate pay grades;

- determining the proper compensation level for employees – after a position has been assigned a

specific pay grade, that grade's pay range can be used to assist in assigning staff salary or pay rate. Factors that affect pay rate within a particular pay grade include experience, the length of the work schedule, and the group of positions that include similar work, training, and skills; and

- administering pay – the CFO and HR director should monitor promotions, transfers, and periodic adjustments to pay grades and individual pay, , and they may recommend to the superintendent that the district adjusts employee pay and compensation structures to remain competitive with external job markets and provide internal equity for staff.

The superintendent, HR Director, and CFO should collaborate on all decisions to study compensation and staffing in the district. The district should also distribute all data from any compensation or staffing studies or reports to the HR director to better inform staffing and compensation decisions.

The district could implement this recommendation with existing resources.

PERFORMANCE MEASURES (REC. 16)

Kingsville ISD lacks a process to evaluate the effectiveness and efficiency of its HR operations.

Effective HR operations are an essential component of managing a successful school district. Payroll represents a significant portion of a school district's expenditures. For school year 2021–22, employee salaries and benefits constituted 64.0 percent of Kingsville ISD's total annual expenditures.

A robust HR function with effective recruitment and retention practices helps ensure that the district invests in a talented, dedicated workforce. In addition to hiring new staff, a core function of HR is supporting current employees throughout their careers and enhancing their employment experience. HR also oversees the equitable application of district policies, procedures, and benefits while maintaining district compliance with federal and state employment laws and HR best practices.

Performance measures track progress toward achieving the organization's objectives by monitoring functions that are key to the success or failure of these efforts. However, the district has not established a process to evaluate its HR operations. In the school year 2021–22 district improvement

plan (DIP), the district established one goal and two key performance measures for HR-related functions. The DIP goal states that Kingsville ISD will support teachers and staff by providing them with research-based professional development that strengthens content knowledge and pedagogy that meets the needs of all learners. The goal includes the following two performance measures:

- Kingsville ISD departments will implement ongoing training to support professional development needs and building capacity in leaders and teachers; and

- One hundred percent of instructional leadership (Curriculum and Instruction, Special Education, School Improvement, principals, instructional teacher coaches) will provide robust professional development that results in teacher knowledge, lesson plans, and instructional delivery that is aligned to the curriculum.

This goal in the DIP is the only measure provided that the district uses to evaluate its HR function. Staff also said that the district does not set annual performance goals for the HR Department nor apply performance measures to assess the effectiveness of HR services. The district does not survey staff regularly regarding the effectiveness of HR functions or solicit staff opinions regarding HR operations.

Performance measures can be used to improve efficiency and effectiveness in routine HR operations. Similarly, obtaining regular employee feedback helps the district assess what is and what is not conducive to HR operations' effectiveness. Gathering employee feedback also can improve staff morale by enabling them to provide input toward improving HR operations.

In a 2010 report, the American Enterprise Institute (AEI), a nonprofit and public policy research organization, emphasizes the importance of HR operations in school districts, stating, "Dramatically improving the quality of teaching requires that a system be able to monitor personnel; gauge performance; and competently manage hiring, transfers, benefits, employee concerns, and termination." AEI recommends using measures for HR that provide the following information:

- the number of applicants for positions, how rapidly they are assessed, and how rapidly successful applicants are placed and prepared;

- staff satisfaction with the HR function's support and responsiveness to various concerns; and

- staff performance on various relevant metrics other than student achievement, such as soliciting performance rankings of teachers by their principals and of other employees by their managers.

In a 2018 report, Hanover Research states that common performance measures for human resources include the numbers and rates of teacher retention and separation, the percentage of teachers with effective ratings, hiring timelines, vacancies, and employee satisfaction with the HR department. Additionally, the Council of the Great City Schools identifies performance measures for HR, including the cost of employee benefits, HR costs per district per full time equivalent, and teacher retention rates.

Kingsville ISD should develop annual goals for each HR activity and establish performance measures to evaluate the effectiveness of the HR function overall.

The HR director should develop annual HR goals and performance measures. One resource the district should use in determining HR goals and performance measures is an annual survey of district staff to determine their satisfaction with the various HR services. The HR Department can establish goals for the survey based on staff satisfaction rates.

The district also should review the examples of performance measures identified by AEI, Hanover Research, the Council of the Great City Schools, and the Society for Human Resource Management, a professional membership association. The district could use some of the following HR performance measures and other metrics:

- percentage of new teachers;

- retention rates of teachers by years of service;

- teacher vacancies unfilled on the first instructional day for students;

- noncertified teachers as a percentage of total teachers;

- substitute placement rate;

- substitute costs per year, by campus, including dollar amount and percentage of salaries and wages;

- average days from recommendation by hiring manager to start date;

- staff separation rate by position (e.g., teachers, principals, auxiliary staff, etc.);

- health benefits cost per enrolled employee;

- benefits cost as a percentage of total salaries and wages;

- HR cost per district full-time-equivalent position;

- rate of noninstructional employees receiving an annual evaluation; and

- exit interview completion rate.

For each implemented performance measure, the district should establish a measurable goal. The superintendent and HR director should meet quarterly to assess HR goals and performance measures. The HR director also should provide the Board of Trustees with quarterly updates regarding HR goals.

The district could implement this recommendation with existing resources.

HR DEPARTMENT PROCEDURES (REC. 17)

Kingsville ISD does not have written procedures for all human resources functions.

Procedures are formally defined methods of accomplishing a task, usually with steps that are performed in a prescribed order. Effective procedures provide guidelines that establish consistency and help ensure that a district's operations are carried out effectively and efficiently. These procedures are compiled either as a comprehensive manual covering all functional areas or individually as departmental manuals. However, Kingsville ISD's HR Department lacks documented procedures that describe all the duties required of HR staff and how staff are to perform critical functions. HR staff stated that newly hired HR Department employees typically receive verbal instruction regarding how to perform their duties. They also learn about informal procedures by following and observing established HR Department staff.

When policies are implemented through informal procedures and institutional knowledge, they cannot be sustained effectively. Additionally, the district risks loss of institutional knowledge with administrative turnover because current practices rely on experienced staff's knowledge of required processes and resources. Staff turnover can result in difficulty and stress for incumbents in these positions to implement their job duties effectively. Reliance on staff knowledge amid turnover also makes it more difficult to ensure that previous procedures or functions continue at the same level of accuracy, consistency, and uniformity.

Kingsville ISD should develop and implement written procedures for its HR Department.

The HR director should list all the functions of the department. Staff that are responsible for each function should record the detailed procedures they follow. The HR director should review the staff's input to the list and then develop a manual including the detailed procedures. The district should have written procedures for the following human resources functions:

- recruitment;

- job posting;

- federal Office for Civil Rights compliance;

- hiring process;

- personnel records;

- management of job descriptions;

- management of performance evaluations;

- substitute management; and

- new staff orientation.

If the HR Department adds new tasks, the HR director should develop procedures and add the procedures to the manual. The HR director should review the manual annually to ensure that procedures are consistent and to determine whether any procedures should be added or discontinued. The district should make the manual accessible on the district's intranet.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

RECRUITMENT AND RETENTION PLAN

As of March 2022, the district did not have significant recruitment or retention issues. As shown in **Figure 4–7**, the district has retained most of its teachers, and staff reported low turnover rates in most district positions. However, Kingsville ISD lacks a comprehensive recruitment and retention plan. A focused and clearly defined recruitment

and retention plan will help ensure the district continues to maintain low staff turnover rates and increase staff morale.

In developing the plan, the district should conduct a survey of staff to assess their job satisfaction and ways to improve staff recruitment and retention. This plan should set goals for recruitment and retention and outline strategies to achieve these goals. The plan should specify who is responsible for each strategy and any resources necessary for its implementation. The completed plan should be communicated to all campus administrators and department heads. The plan should consider including the following strategies:

- require open positions to be advertised at various university and college career centers;

- develop an activity calendar, finalized annually in January or early February, to identify dates of recruitment fairs and staff that will attend. The district should consider requiring campus principals to attend recruitment fairs and conduct initial interviews with potential candidates;

- develop recruitment packets to distribute at events that clearly describe the district's salary, benefits package, and incentive programs;

- schedule interview dates with prospective teachers from early spring until midsummer so that campus administrators can attend while applicant pools are at their peak;

- establish a teacher mentoring program that is administered across all campuses consistently. The mentoring program should target first-year teachers and any teachers who are new to Kingsville ISD. The district should evaluate the mentoring program annually and modify it as needed; and

- investigate the Texas Education Agency (TEA) Grow Your Own program and apply for available grants. The Grow Your Own program focuses on: (1) recruiting future educators by offering education and training courses with potential dual-credit opportunities to current high school students within the district; and (2) transitioning paraeducators to teaching roles and supporting teacher residency models. Grant recipients receive funds to start or expand education and training courses and associated career and technical student organizations at the high schools and strengthen these

programs using the resources and support of TEA's technical assistance network.

Since the time of the review, Kingsville ISD staff indicated that the district has implemented a new recruitment and retention plan that includes established goals. Additionally, staff stated the district has instituted new processes to improve recruitment some of which include creation of a new Job Application Center, expansion of where the district posts job openings, increased attendance at job fairs, and development of a recruitment brochure.

PERSONNEL FILE MANAGEMENT

Kingsville ISD's personnel files are maintained securely in filing cabinets in the HR Department office. The district does not have a checklist for items that should be included in the files; however, each file is organized to show what should be included. During onsite observations, the LBB review team examined a series of randomly selected files and found that the information maintained in each file was consistent and followed the industry standards of what should be included in district personnel files. However, the district lacks a process to audit the personnel files annually to ensure their accuracy. HR staff stated that previous partial file audits they have conducted found incomplete or obsolete files. The HR Department should develop a checklist of all items to be included in personnel files, and the district should conduct a regular audit of its personnel files during the summer every two years to maintain consistency.

PROFESSIONAL DEVELOPMENT

Kingsville ISD's HR Department is not responsible for professional development in the district. Each department and campus oversees and tracks its own professional development. The Curriculum and Instruction Department tracks professional development and maintains a professional development schedule for teachers. However, according to interviews with department heads and campus staff, the district does not have a professional development schedule or professional development goals for nonteaching staff. The HR Department should develop an electronic template that departments and campuses can use to develop a professional development schedule for nonteaching staff. This tool could include a section for developing annual and multiyear professional development goals for each employee. The HR Department could ask department heads and campus administrators to update this tool for all staff annually and submit it electronically to the HR Department. The HR Department then could establish professional development

requirements for each position and report professional development progress to the superintendent annually.

Since the review team's onsite visit, Kingsville ISD staff reported that the district has implemented a checklist for items that should be included in personnel files and reviewed files to ensure they contain necessary components.

OVERTIME

Kingsville ISD's process for approving employee overtime lacks established quality control procedures. The district authorizes nonexempt employees to accrue overtime, and they may receive pay or compensatory time for overtime worked. All campuses and departments approve and record overtime on manual timesheets. All approved overtime compensation is processed by the payroll specialist in the Finance Department, who is responsible for informing the CFO of any overtime claims that require explanation before approval.

Staff reported that the district has no formal process that guides the oversight process and no consistent standards for the CFO to inquire about an overtime request. The district also has not established a monitoring process to ensure that supervisors in departments and on campuses properly authorize overtime. No evidence nor data show excessive overtime requests or abuse of policy at Kingsville ISD. However, staff stated that the CFO has questioned several overtime claims during the last few school years.

Ensuring the accuracy of overtime compensation claims helps the district to preserve financial resources while budgeting more accurately for labor costs. In addition, by providing managers with clear guidelines on what overtime claims are acceptable by the district, opportunities to engage in intentional or unintentional fraud will be minimized before requests are approved by the department head and processed by the payroll specialist.

Kingsville ISD should establish standards for managers to use when approving overtime and periodically audit overtime requests and payments. The CFO should monitor, analyze, and report overtime to the superintendent monthly and report to the board quarterly. These reports should summarize overtime requests by department, campus, and staff positions. In addition, the CFO should establish guidelines to control the amount of overtime hours that can be incurred during a specific timeframe. At a minimum, the guidelines should include reasons to approve overtime and the maximum number of hours of overtime authorized per staff and

department. These guidelines should be distributed to all department heads and campus administrators.

FISCAL IMPACT

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

The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. The implementation of **Recommendation 14** will require a cost to digitize the district's personnel records, but this amount cannot be determined until the district obtains quotes from vendors to determine which vendor offers services that best fit the district's needs. Similarly, upgrading the district's financial management application or purchasing additional applications will require a cost; but this amount cannot be estimated until the district determines which application upgrades are available and which additional applications to purchase.

5. FACILITIES MANAGEMENT

FINDINGS

♦ Kingsville ISD lacks a long-term, comprehensive, facilities master-planning process.

♦ Kingsville ISD lacks a formal preventive maintenance process and relies on veteran staff's knowledge of when to perform recurring tasks.

♦ Kingsville ISD is not using the full capabilities of the department's work-order system to facilitate data-driven decision making.

RECOMMENDATIONS

♦ **Recommendation 18: Establish a five-year facilities master plan and update the plan annually.**

♦ **Recommendation 19: Develop, document, and implement a formal preventive maintenance program and a process for tracking and using product warranties.**

♦ **Recommendation 20: Use the work-order system to document and track work requests, staff assignments, parts and supply costs, labor hours, and preventive maintenance activities, and provide training for staff to fully implement these functions.**

BACKGROUND

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

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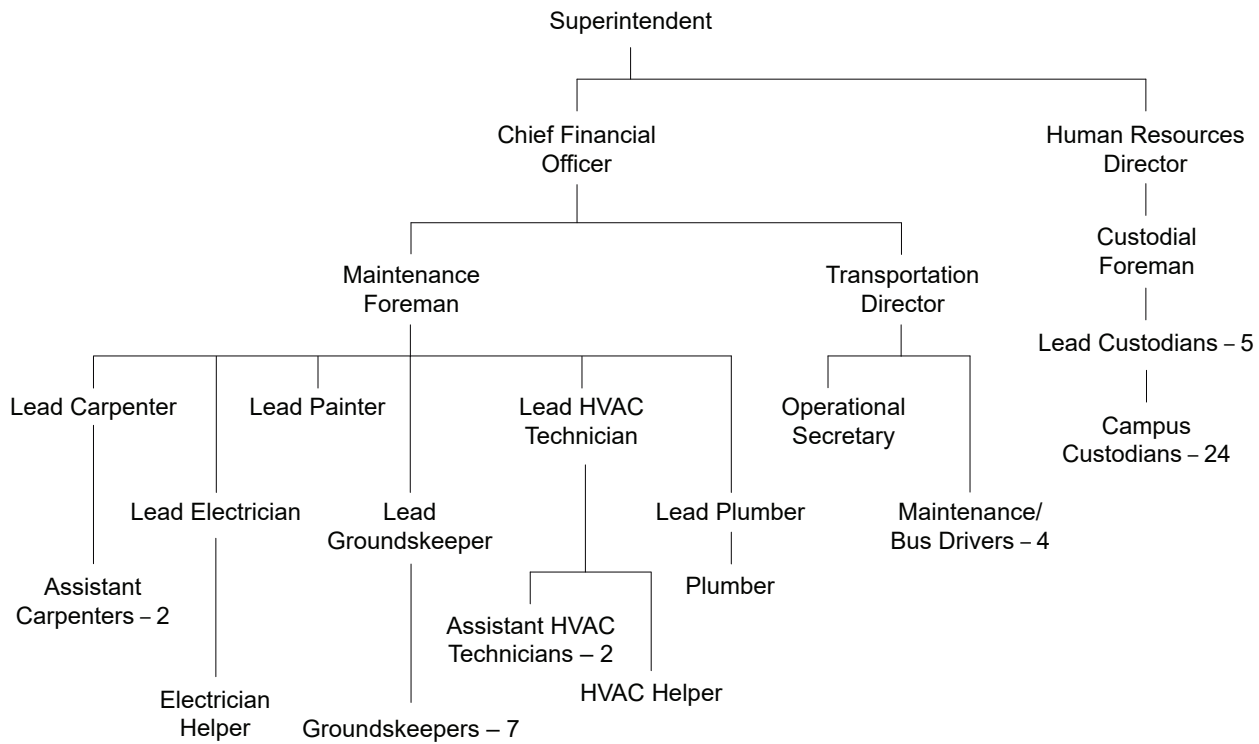
condition, curriculum needs, and state regulations. Management of construction and maintenance projects should include contract management, cost control, and a project schedule with defined milestones. Facilities maintenance requires a program for planned maintenance of facilities and equipment and routine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

Figure 5–1 shows Kingsville Independent School District's (ISD) facilities management organization for school year 2021–22. The district's chief financial officer (CFO) is responsible for supervising the maintenance function and managing facilities. A maintenance foreman manages the Maintenance Department, which consists of 24 maintenance workers, including four positions shared with the Transportation Department, and an operational secretary shared with the Transportation and Custodial departments. The district's 24 maintenance workers are organized by trades—carpenters, plumbers, heating, ventilation, and air conditioning (HVAC) technicians, groundskeepers, painters, and plumbers—staffed with leads, assistant leads, and helper positions. The human resources director supervises the custodial foreman, who manages five lead custodians and 24 campus custodians.

Kingsville ISD has six campuses: three elementary schools, one middle school, one high school, and one disciplinary alternative education program campus. The district also owns and maintains an administrative building and a complex containing the maintenance facility, transportation facility, and warehouse. **Figure 5–2** shows Kingsville ISD's properties, the years of their construction, and the square footage for each district building.

Figure 5–3 shows the actual facilities maintenance and operations costs for Kingsville ISD and its peer districts for school year 2020–21. Peer districts are districts similar in size and other characteristics to Kingsville ISD that are used for comparison purposes. The peer districts for Kingsville ISD are Alice ISD, Robstown ISD, and West Oso ISD. Kingsville ISD spent $4.6 million for facilities maintenance and operations, which was greater than two of its peer districts and the peer district average. Kingsville ISD's facilities maintenance and operations expenditures represented 13.7 percent of its total expenditures and cost an average of $1,630 per student. For school year 2021–22, Kingsville ISD

FIGURE 5–1
KINGSVILLE ISD FACILITIES MANAGEMENT ORGANIZATION
SCHOOL YEAR 2021–22

Superintendent

Chief Financial Officer

Human Resources Director

Maintenance Foreman

Transportation Director

Custodial Foreman

Lead Custodians – 5

Lead Carpenter

Lead Painter

Lead HVAC Technician

Operational Secretary

Campus Custodians – 24

Lead Electrician

Lead Groundskeeper

Lead Plumber

Maintenance/ Bus Drivers – 4

Assistant Carpenters – 2

Plumber

Assistant HVAC Technicians – 2

Electrician Helper

Groundskeepers – 7

HVAC Helper

NOTE: HVAC=heating, ventilation, and air conditioning.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

FIGURE 5–2
KINGSVILLE ISD FACILITIES
SCHOOL YEAR 2021–22

FACILITY (1)	YEAR OF CONSTRUCTION	SQUARE FOOTAGE
Administration Building	1943; 1959	33,062
Agriculture Complex (2)	N/A	10,058
Gillett Middle School	2004	130,014
Harrel Elementary School	1969; 1977	48,206
Harvey Elementary	1943; 1978; 1997	70,983
King Early College High School	2014 (outlying buildings 1962; 1972)	328,564
Kleberg Early Childhood Literacy and Continuing Education Center	1947	59,861
MoPac Complex (Maintenance, transportation, and warehouse)	1959; 1967; 2000	10,061
Perez Elementary School	1969; 1977; 1994	52,986
Pogue Options Alternative Academy	1955; 1996	1,912
Total		**745,707**

NOTES:
(1) Kingsville ISD also owns three properties that are closed campuses: Memorial Middle School, built in 1980; Lamar Elementary School, built in 1913, with additions in 1955; and McRoberts Elementary, built in 1958, with additions in 1972 and 1979.
(2) The district did not provide a year of construction for the Agricultural Complex.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD Facility Inventory, March 2022.

FIGURE 5–3
KINGSVILLE ISD AND PEER DISTRICTS' FACILITIES MAINTENANCE AND OPERATIONS COSTS
SCHOOL YEAR 2020–21

DISTRICT	FACILITIES MAINTENANCE AND OPERATIONS EXPENDITURES	PERCENTAGE OF ALL FUNDS	ENROLLMENT(1)	COST PER STUDENT
Kingsville ISD	**$4,645,702**	**13.7%**	**2,850**	**$1,630**
Alice ISD	$5,814,206	11.1%	4,673	$1,244
Robstown ISD	$4,165,665	12.8%	2,601	$1,602
West Oso ISD	$3,373,711	14.2%	1,975	$1,708
Peer average	$4,451,194	12.7%	3,083	$1,518

NOTE: Enrollment numbers are taken from the 2020–21 Texas Academic Performance Report in order to align with budgetary information.
SOURCES: Legislative Budget Board School Performance Review Team, March 2022; Texas Education Agency, Public Education Information Management System, school year 2020–21.

budgeted approximately $4.5 million for facilities maintenance and operations.

DETAILED FINDINGS

MASTER PLANNING (REC. 18)

Kingsville ISD lacks a long-term, comprehensive, facilities master-planning process.

The district has not developed a facilities master plan to provide a framework for long-term planning. Such plans ensure that facilities support the district's educational goals by identifying existing facility conditions, new or replacement facilities required to meet district needs, and funding options. When the Legislative Budget Board's School Performance Review Team visited the district in March 2022, district staff reported plans to contract with vendors to develop a facilities master plan.

Kingsville ISD makes decisions about its facilities in a reactive manner that focuses on immediate problems and short-term solutions. Decisions about major facility renovations or upgrades are made ad hoc as staff identify needs and report them to district administration. For example, at the time of the onsite visit, the district was focused on repairing leaking roofs at several of the district's facilities. To address this problem, the CFO contracted with a consultant to develop a comprehensive assessment of needed roof repairs with cost estimates. These efforts were not part of a larger facilities condition assessment process to identify all the district's facilities needs and to plan for current and future repairs.

In another example, the district closed two campuses after school year 2020–21. The district's goal in closing these campuses was to help reduce the district's budget deficit, and leadership selected the campuses to close based on facilities utilization calculations performed by a consultant. These calculations appear to represent usage based on building capacity and do not account for needs beyond the current number of students enrolled. For example, administrative and non-classroom educational space, such as rooms for additional educational services and testing, do not appear to be part of the utilization assessment. The district's decision to close these campuses did not include enrollment projections, and, according to staff interviews, the district has no formal plans for future changes in enrollment. During interviews, district administrators described informal plans for what to do if enrollment increases significantly, but each administrator described a different course of action.

The district also lacks an effective, ongoing process for assessing facility conditions. The district addresses issues as maintenance staff observe them informally; however, the Maintenance Department does not follow a documented process for evaluating the condition of buildings and grounds periodically to drive a comprehensive assessment for facilities planning.

Without a comprehensive facilities master-planning process, the district has no defined method for prioritizing or budgeting for facility issues. During interviews, staff identified several district facility needs, including facilities for career and technical education in need of repair, plumbing issues, aging facilities with limited space for additional educational services and testing, and a lack of standards for elementary playgrounds and physical education facilities. The two oldest elementary schools have limited spaced, outdated facilities, no gymnasiums, and very limited playground equipment.

Without an annual condition assessment process, the district may be unable to identify and address critical maintenance issues promptly. The lack of planning for facilities utilization may hinder educational opportunities and restrict the district's ability to use specialized facilities as intended.

A well-developed facilities management plan supports a highly effective educational system across many operational areas, including the following examples:

- providing a baseline assessment for decisions about district facilities;

- ensuring that district facilities continue to meet current and long-range educational programming needs;

- facilitating input on district facilities from all stakeholders, including the community, parents, students, and staff;

- clearly communicating the district's facility requirements and goals; and

- providing a basis for developing bond proposals to support facility improvements and accomplish educational initiatives.

The Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter CC, Section 61.1036(a)(9), encourages school districts to formulate a long-range facilities plan before making major capital investments. When developing a plan, a school district's process should include input from teachers, students, parents, taxpayers, and other interested parties that reside within the school district. The National Council on School Facilities website publishes facilities-planning resources, including informational videos on educational facilities planning and links to examples of facility master plans from rural, town, suburban, and urban districts.

Kingsville ISD should establish a five-year facilities master plan and update the plan annually.

The superintendent should establish a comprehensive, long-range, facilities master-planning committee to identify facility needs and develop a plan to address those needs. The committee should adopt a formal facility master-planning process. This process is necessary to ensure that the district could maintain its facilities within available funding and to a level that supports an effective educational program. The district should begin the process of determining improvements based on input from the campus principals, the custodial and

maintenance staff, the superintendent, and the maintenance and transportation foremen. The district should develop the plan using the following key steps and considerations:

- identify a committee of stakeholders to be involved in the planning process; this committee could include the superintendent, maintenance and custodial staff, local campus staff, parents, community stakeholders, students, and Board of Trustees members;

- assess whether district staff have the expertise to conduct a comprehensive facilities needs assessment to determine the status of buildings and systems and identify current and future needs. If the committee determines a consultant is needed, the district should initiate the process to solicit bids from a vendor. The committee should ensure that the master-planning process includes the following steps:

  - assess the capacity of each campus facility by setting standards that govern student-to-teacher ratios and the amount of square feet required per student in a classroom. These standards should specify the minimum size of core facilities, such as classrooms, gymnasiums, cafeterias, and libraries, so that campuses do not overload these facilities or overuse portable classrooms;

  - develop a facility inventory that identifies the use and size of each room at each campus;

  - analyze student enrollment to establish accurate enrollment projections for at least five years;

  - identify current needs for safety, accessibility, and energy improvements; and

  - solicit input from district staff, students, community representatives, and other stakeholders. Methods may include establishing a subcommittee, conducting periodic meetings for feedback, and enabling stakeholders to submit feedback through the district's website;

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

- analyze the available data and develop a five-year facilities master plan that includes the status of each facility, facility goals and objectives, recommendations for facility improvements, and projected costs for

these improvements. In developing the plan, the district should consider expected changes to facility needs, including curriculum and technology, safety and security developments, and the incorporation of local, state, and federal requirements;

- establish facility priorities to maintain the district's facility investments and educational programming priorities to provide learning environments that meet the district's changing curriculum;

- identify funding sources for the work; and

- implement a process to monitor the plan throughout its duration.

The district should submit the facilities master plan to the board and superintendent for review and approval and update the plan annually to ensure the ongoing assessment of facility needs.

The district could implement this recommendation with existing resources.

PREVENTIVE MAINTENANCE (REC. 19)

Kingsville ISD lacks a formal preventive maintenance process and relies on veteran staff's knowledge of when to perform recurring tasks.

Preventive maintenance is the regular and routine maintenance of equipment and assets to maintain their optimal operation and prevent costly downtime from unexpected equipment failure. Kingsville ISD's preventive maintenance schedule is informal and based on the institutional knowledge of the maintenance foreman and the maintenance leads. Instead of following a preventive schedule, the maintenance foreman and leads prioritize tasks as they arise, typically responding to work orders for safety issues first, then addressing other issues on a first-in, first-out basis. The department relies on the historical knowledge of maintenance staff to determine the maintenance needs of district equipment. At the time of the review team's onsite visit, the maintenance foreman and each lead had decades of experience working in the department and performed routine maintenance regularly. The foreman reported that many of the regular preventive maintenance tasks are carried out during the summer months using auxiliary staff from other departments, including transportation and food service staff. However, relying solely on the institutional knowledge of veteran staff to ensure that facilities and equipment are maintained at appropriate intervals places the department at

greater risk of inefficiency if these staff separate from the district's employment. Furthermore, the department's work-order system can generate automated preventive maintenance schedules and send notifications when equipment needs to be replaced.

Additionally, the district does not have a process to align warranties with required preventive maintenance for the products they cover. A warranty is a promise, made in connection with the sale of a product by a supplier or installation by a contractor, that guarantees that the material or workmanship meets a standard of performance during a specified time. Warranties for systems and products are provided through the manufacturer with self-defined terms and conditions. A written warranty often is provided or required by the language set in construction contract documents. District staff reported that product warranties provided by manufacturers and installers are not consolidated or tracked centrally. The district relies on the maintenance staffs' knowledge of the products and systems to know whether a warranty is in place.

Without clearly documented preventive maintenance schedules and procedures, the district risks equipment failures or decreases in the useful life of facilities and equipment. A lack of sufficient preventive maintenance can increase maintenance costs. Warranties ensure that a minimum level of quality is provided, and when the product or system fails, it is replaced by providers at their expense. If the district does not track and maintain applicable warranties, the warranties can become invalidated or negated. The results are a diminished return on taxpayer investments in facilities and the potential for the district to pay for maintenance or replacement that is the responsibility of other parties.

Kingsville ISD should develop, document, and implement a formal preventive maintenance program and a process for tracking and using product warranties.

The maintenance foreman should develop a comprehensive preventive-maintenance plan and submit it to the superintendent for approval. **Figure 5–4** shows a sample preventive maintenance schedule the district could use as an example.

This preventive maintenance plan should include a process for managing product warranties and implementing any required preventive maintenance. The maintenance foreman should ensure that all maintenance staff are trained on the required steps for preventive maintenance tasks. The maintenance foreman should incorporate the preventive maintenance schedule into the work-order management

FIGURE 5–4
SAMPLE FACILITIES PREVENTIVE MAINTENANCE SCHEDULE, MARCH 2022

ACTIVITY	FREQUENCY
Clean air-conditioning unit filters	Every 2 months
Change air-conditioning unit filters	Intervals ranging from 3 weeks to 12 weeks
Clean chiller condenser coils	Every 2 years
Clean fan coil and air handler evaporator coils	Annually
Clean ice machine condenser coils	Every 4 months
Inspect and test chillers' capacity	Annually
Change chiller compressor oil and cores	Every 2 years
Check chemical levels in closed-loop chilled and hot water piping	Monthly
Clean grease traps	Every 3 months
Inspect and test boilers	Annually
Check roofs, downspouts, and gutters	Monthly; repair as needed
Inspect exterior lighting	Every 6 months
Inspect school gymnasium lighting	Annually
Inspect and clean gymnasium gas heaters	Annually
Inspect playground equipment	Monthly, repair as needed
Clean fire alarm system smoke detectors	Every 6 months
Inspect all interior and exterior bleachers	Annually, repair as needed
Clean, tighten, and lubricate rollout bleachers	Annually
Check exterior building and concrete caulking	Annually – replace every 8 years
Repaint stripes in exterior parking lots	Annually
Check condition of asphalt parking lots	Annually – replace every 12 years
Examine carpeting	Check quarterly for damage and replace every 15 years, or as needed
Examine vinyl composition tile floors	Check quarterly for damage and replace every 20 years, or as needed
Spray-wash exterior soffits and buildings	Every 2 years or as needed
Replace glass and plexiglass	As needed
Paint interior of facilities	Every 5 years
Paint exterior of facilities	Every 8 years
Perform general facility inspections	Annually

Source: Legislative Budget Board School Performance Review Team, March 2022.

system to schedule reminders and document that all tasks have been completed.

The district could implement this recommendation with existing resources.

WORK-ORDER SYSTEM (REC. 20)

Kingsville ISD is not using the full capabilities of the department's work-order system to facilitate data-driven decision making.

The district manages its daily maintenance operations through work-order requests that Kingsville ISD staff enter into an online system. The district uses a web-based work order-management system specifically for educational facilities. The department's use of the system is limited to generating and printing work orders. The work-order process is inefficient and reliant on paper-based processes. The district does not use the full capacity of the online work-order software because maintenance staff said they are not confident using the software.

To make a maintenance request, staff submit paper-based work orders to department or campus secretaries, who enter the information into the work order-management system. The operational secretary prints the work orders from the system and submits these printed orders to the maintenance foreman. The foreman assigns and distributes the printed work orders to maintenance staff. After maintenance staff complete repairs, they ask the campus or department secretary to sign the printed work orders verifying that the repair is complete. Maintenance staff submit completed work orders to the maintenance foreman, who delivers them to the operational secretary to enter into the work-order system.

The district does not use the work-order system to track and report on department performance. The system can track equipment repairs, time required for repairs, repair costs, and staff performance and generate these reports for review. However, the district does not analyze this data to evaluate its facility needs, develop maintenance plans, or evaluate staffing levels. According to interviews, maintenance staff do not use the system for data analytics and reporting because they are not confident using the application for these tasks.

Without tracking this data, the department is unable to determine and compare the cost of maintaining building systems. As an example, one brand of an HVAC system may require more maintenance including parts, supplies, and labor. Analysis of these metrics will better enable managers to make informed decisions regarding the type of equipment to be installed and to understand its implications on the budget required to support effective maintenance activities.

Effective use of a maintenance management system includes the following components:

- tracking and prioritizing work requests;

- scheduling and tracking preventive maintenance work such as filter changes, seasonal shutdown of systems (e.g., pool filtration units and irrigation systems), and the regular inspection of safety systems and devices such as emergency lights and fire extinguishers;

- tracking of employee productivity; and

- analyzing costs to maintain budget integrity and for budget development.

Kingsville ISD should use the work-order system to document and track work requests, staff assignments, parts and supply costs, labor hours, and preventive maintenance

activities, and provide training for staff to fully implement these functions.

The maintenance foreman should use the reporting and analysis features of the work order-management system to track and identify trends in staffing assignments, monitor performance, and identify ongoing issues with facilities, equipment, or systems.

The maintenance foreman should request user training for maintenance staff to promote a clear understanding of the capabilities of the system for work management, data analysis, and reporting.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATION

During the onsite visit, the review team observed an additional issue regarding the district's programs and services to students, staff, and the community. This observation is presented for consideration as the district implements the report's other findings and recommendations.

Kingsville ISD Board Policy CL (LEGAL) requires the district to establish a long-range energy plan to reduce annual electric consumption. The plan must include strategies for achieving energy efficiency that result in net savings for the district or that can be achieved without financial cost to the district.

The district has begun reducing energy consumption by conducting energy audits at each campus and implementing energy conservation recommendations. In addition, the CFO sends a reminder email to all staff to turn off electrical devices and appliances before school breaks. Although these are valuable steps to meet the goals of the policy, Kingsville ISD's efforts have not been documented in a formal plan. The district should develop a written energy management plan to support the district's annual reduction in energy use, in accordance with board policy.

FISCAL IMPACT

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

Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

6. SAFETY AND SECURITY MANAGEMENT

FINDINGS

♦ Kingsville ISD does not have effective, consistent, physical security controls for all campuses.

♦ Kingsville ISD lacks written safety procedures and clearly defined roles and responsibilities for safety management.

♦ Kingsville ISD has not established a formal safety and security committee as required by statute.

♦ Kingsville ISD lacks a formal process to conduct safety audits and implement recommendations in a timely manner.

RECOMMENDATIONS

♦ **Recommendation 21: Strengthen visitor-management procedures and assess the need for additional physical security upgrades at district facilities.**

♦ **Recommendation 22: Develop a procedures manual to guide safety and security operations in the district.**

♦ **Recommendation 23: Form a safety and security committee to formalize safety and security processes in the district.**

♦ **Recommendation 24: Establish a process for evaluating and implementing the results of district safety assessments.**

BACKGROUND

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

A comprehensive approach to planning for physical security considers locking systems; monitoring systems; equipment and asset protection; visibility of areas and grounds; police and school resource officers; and emergency operations. Emergency and disaster-related procedures must include fire protection, environmental disasters, communication systems, crisis management, and contingency planning. To identify physical hazards, a school district must consider playground safety and overall building and grounds safety. Environmental factors, such as indoor air quality, mold, asbestos, water management, and waste management, also affect the safety of school district facilities.

Figure 6–1 shows the organization of safety and security staff in the district. For school year 2021–22, the primary staff responsible for safety and security in Kingsville Independent School District (ISD) was the executive director of school improvement, whose title regarding these roles is district safety officer. The district maintains a memorandum of understanding with the Kleberg County Sheriff's Office to employ two school resource officers (SRO), primarily stationed at the high school campus. Kingsville ISD also staffs a security guard at the high school campus. The district's charge nurse, who reports to the human resources director and supervises four campus nurses, has many safety-related responsibilities such as overseeing mandatory safety trainings, monitoring the district's automatic external defibrillators, and implementing health safety protocols. The chief financial officer (CFO) supervises the maintenance and transportation foremen, who both have some safety duties as part of their secondary responsibilities. These duties include maintaining locks, doors, and other safety-related aspects of district facilities. Campus principals, who report to the assistant superintendent of curriculum and instruction, and their assistant principals also have safety and security roles such as emergency planning, conducting drills, monitoring visitors, and identifying threats to their campuses. The executive director of school improvement's administrative assistant assists with safety duties, including supporting the executive director's oversight of fire alarms and fire safety equipment.

The Texas Education Code, Section 37.108, requires each school district to adopt and implement a multihazard emergency operations plan (EOP) for use in its schools. An EOP should address mitigation, preparedness, response, and recovery for various natural and other crises, such as those caused by a natural disaster or another immediate

FIGURE 6–1
KINGSVILLE ISD SAFETY AND SECURITY ORGANIZATION
SCHOOL YEAR 2021–22
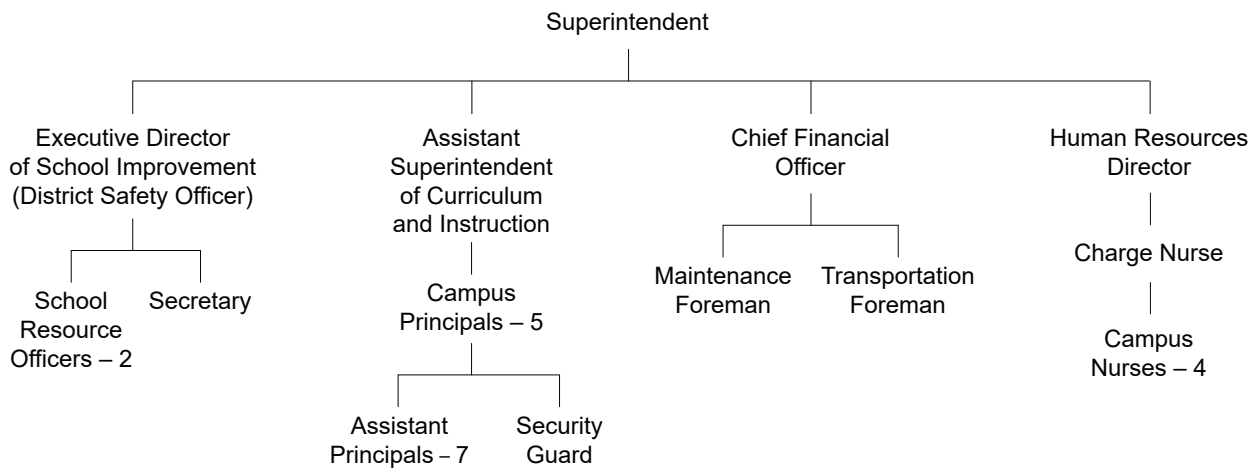
NOTE: Positions other than the executive director of school improvement, school resource officers, and security guard have secondary safety and security responsibilities in addition to their primary position duties.
SOURCE: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

threat, for example. A districtwide EOP includes campus-specific plan components.

As district safety officer, the executive director of school improvement oversees emergency planning and communication in Kingsville ISD. The executive director has participated in emergency planning trainings and developed a process for EOP development, implementation, and monitoring. With assistance from the SROs, human resources director, charge nurse, and transportation foreman, the executive director of school improvement completes the districtwide sections of the EOP using a template from the Texas School Safety Center, a research facility at Texas State University that conducts school-safety initiatives outlined in statute. The executive director of school improvement provides campus administrators with templates to complete their campus-specific sections. According to staff interviews, the executive director reviews submissions from the designated EOP staff regularly, and the superintendent monitors this review periodically.

Kingsville ISD also supports emergency preparedness at the district level by organizing districtwide training and drills for active intruder incidents and for evacuation of students with limited physical mobility from second-story locations. The district allocates funds for emergency-preparedness kits for each classroom and distributes these kits and visual materials for the district's emergency-preparedness drill system. The

district uses several methods to communicate with families in emergency situations, including posting updates on social media and sending recorded telephone calls. The superintendent also directed the executive director of school improvement to develop scripts that communicate standardized, consistent language regarding certain types of safety-related or emergency situations.

DETAILED FINDINGS

PHYSICAL SECURITY (REC. 21)

Kingsville ISD does not have effective, consistent, physical security controls for all campuses.

Physical security refers to specific measures and equipment that are intended to deny unauthorized access to facilities and protect people and property from damage or harm. Such measures and equipment include visitor-management systems, video surveillance, protective barriers, metal detectors, locks, intrusion-detection sensors and alarms, and security guards.

Staff reported that visitor-management procedures follow historical practice and have not been assessed or aligned across campuses or with best practices. Additionally, these procedures are not documented clearly and consistently in the Board of Trustees' policy and district handbooks. The Legislative Budget Board's School Performance Review Team visited the district in March 2022. The review team observed

inconsistent and ineffective visitor-management procedures at campuses. For example, most campuses did not use an electronic background check system, and campus staff were inconsistent in requiring visitors to sign out.

Kingsville ISD's campuses have video surveillance systems in place to monitor main entries, exit doors, and hallways. Although the district has updated and expanded video surveillance coverage, staff reported a need for additional cameras, and some cameras may be blocked by decorations or landscaping.

All campuses in the district have designated main entrances for visitors, students, and staff to enter the buildings. Most campus entrances are unlocked during the school day and have foyers, and visitors are directed to the administrative offices to sign in. The district does not have metal detectors at its campuses. Some of Kingsville ISD's campuses do not have security vestibules, which are secured spaces with two or more sets of doors that restrict visitor access to one space, nor electronic systems to control doors remotely. Staff said they were concerned that campus administrative offices were not secured adequately from intruders. Most campuses have comprehensive perimeter fencing with locked gates, but some campuses lack perimeter fencing and have multiple points of entry. Staff also reported a nonoperating electronic gate that provides access to district property during working hours.

Kingsville ISD's staff maintain locks throughout the district; some campuses use keyed locks, and others have electronic keycard access. Access to master keys is restricted to campus administrators, head custodians, and some department heads or extracurricular sponsors. Most Kingsville ISD campuses conduct annual key inventories to monitor controlled access to master keys.

The district has fire alarm systems throughout its campuses, but it does not have intrusion-detection sensors and alarms at all facilities.

During school year 2021–22, the district staffed two SROs and one security guard, all officed primarily at the high school campus. The SROs are available to support other campuses on request, and the security guard was assigned temporarily to the middle school campus at the time of the review team's onsite visit.

District and campus administrators reported that the district does not have a process to evaluate the effectiveness of its efforts to maintain physical security. Some administrators also reported the lack of a process for reporting potential safety concerns or observed needs for security upgrades on campuses. For example, the executive director of school improvement said that he became aware of the need for additional security vestibules at many campuses while conducting intruder drills. These issues were observed previously by some campus administrators but had not been identified by district leadership or communicated through an established feedback process.

Variations in safety and security practice could increase the potential for emergencies and threaten the safety of Kingsville ISD students and staff. The district's practices for controlled access to campuses and visitor management could enable unauthorized individuals to gain undetected access to campuses. These circumstances increase the likelihood of a preventable crisis, placing students and staff potentially at risk.

Partner Alliance for Safer Schools is an organization that supports school safety and provides districts with safety information and tools. Its Safety and Security Guidelines for K–12 Schools provide best practices for improving many aspects of school physical safety and security, including the importance of access controls, video surveillance, and alarms and detection as components of safe schools.

A Systems Approach to Physical Security in K–12 Schools, a 2021 report produced by the Homeland Security Operational Analysis Center, a federally funded research and development center operated by the RAND Corporation, states that a school district "will be best placed to achieve security and safety benefits when it takes a layered approach to protection and mitigation. Measures in place ... at the campus perimeter, school grounds, building perimeter, and building interior ... provide incremental protection against threats and help prevent single points of failure." How schools prioritize certain layers "will depend on their unique contexts, which can include the surrounding neighborhood, campus and building layout, student population, and geographical location."

The U.S. Department of Homeland Security, U.S. Department of Education, U.S. Department of Justice, and the U.S. Department of Health and Human Services established SchoolSafety.gov to share actionable recommendations to address safety for school communities. SchoolSafety.gov includes resources for finding grants for school safety, including a library of available grants and matching tools.

Kingsville ISD should strengthen visitor-management procedures and assess the need for additional physical security upgrades at district facilities.

The executive director of school improvement should evaluate current visitor-management procedures at all campuses and oversee the development of revised written procedures for all instructional and noninstructional facilities. The executive director of school improvement should train all staff, students, families, substitutes, and vendors regarding these procedures, and inform families and community members of visitor procedures. District staff should ensure that all campuses have functional visitor-management systems with the capability to print badges identifying visitors. The superintendent and campus administrators should ensure that all campuses and district facilities are complying with the procedures. The executive director of school improvement, with input from a safety and security committee (SSC), when it is established, should develop a schedule to implement and monitor visitor-management procedures across the district. The executive director of school improvement should provide monitoring reports to the superintendent and the board regularly. The superintendent should recommend that the board incorporate these detailed visitor-management procedures into local board policy.

The superintendent, executive director of school improvement, SROs, campus administrators, and the newly established SSC should perform the following tasks:

- define roles, responsibilities, and procedures for annual evaluations and ongoing monitoring of physical security;

- assess the district's current visitor-management and video surveillance systems and associated equipment;

- consult best practices in physical security;

- review existing physical security recommendations from the most recent district audit report;

- establish a clear process for staff and stakeholders to provide feedback;

- evaluate the need for additional safety and security upgrades in the district, such as perimeter fencing and access controls; and

- make strategic recommendations and estimates for projects and equipment, including a prioritized order of implementation.

Since the review team's onsite visit in March 2022, Kingsville ISD staff reported that the district has implemented a new school safety plan for school year 2022–23. The district indicates that this plan established a consist visitor management process and provided improved physical security controls across all campuses.

No fiscal impact is assumed regarding additional safety upgrades until district staff have assessed and recommended to the superintendent those that would fit the district's needs best.

SAFETY AND SECURITY PROCEDURES (REC. 22)

Kingsville ISD lacks written safety procedures and clearly defined roles and responsibilities for safety management.

For school year 2020–21, the superintendent assigned district safety and security responsibilities to the executive director of school improvement. These responsibilities include: emergency planning; emergency drill training and monitoring; alarm and public address system updates; fire code compliance; safety audits; and threat assessments. According to staff interviews, these responsibilities were not in the position's original job description and were not defined clearly. The district has not developed written operating procedures for safety management. The executive director of school improvement primarily executes safety and security responsibilities in response to the superintendent's directives, individual research, or feedback from staff or local officials.

The district's Student Handbook, Student Code of Conduct, and Employee Handbook provide basic safety guidelines but lack detailed procedures for implementing district safety policies. The campus-specific components of the EOP provide additional written guidelines for safety operations such as student–parent reunification and preventive measures. However, these documents are not developed or disseminated in the style of procedural manuals and they are not organized, user-friendly documents with comprehensive guidance for all relevant tasks.

Policies provide authorized guiding principles for basic decision making, and procedures define the tasks to perform. Clear policies and procedures also can minimize the district's liability and risk when incidents occur.

The district also lacks a process for soliciting stakeholder feedback regarding safety and security. District staff have not documented expectations for the types and frequency of

safety surveys or other instruments to administer, the analysis and response to input, and methods and frequency for informing stakeholders of the results.

Without written documentation of safety and security procedures, Kingsville ISD staff, students, and community stakeholders could lack guidance for appropriate behaviors in certain situations. The district's lack of documented procedures could hinder its consistent compliance with state statutes. Furthermore, inadequate involvement with the community can degrade the credibility of district leadership and erode confidence in the overall safety and security of Kingsville ISD campuses. The review team's survey results for school year 2021–22 showed that 37.5 percent of parents surveyed agreed with the statement "students feel safe and secure at school."

Until it has documented and implemented policies and procedures, the district risks responding improperly in an emergency and risks potential noncompliance with authorized safety standards. Campus security is reduced unnecessarily, which exposes the district to liability. Additionally, the district risks incomplete or ineffective execution of its safety and security functions, especially when unexpected turnover among staff occurs.

Laredo ISD's website includes a school safety and security manual. The manual includes chapters on general safety, instructional safety, and support services that cover various topics such as safety officer responsibilities, drill requirements, custodial chemical usage, machine safety, and school shop safety. The Austin ISD Police Department has published a comprehensive policy and procedures manual for its departmental staff. The National Crime Prevention Council's *School Safety and Security Toolkit: A Guide for Parents, Schools, and Communities*, published in 2009, is a best practice resource that includes detailed strategies to collect community input regarding safety and security issues. The guide recommends a community forum to gain insight into community perceptions and to ask for assistance in developing safety and security plans. The guide provides helpful detail about planning, advertising, and conducting the forum.

Kingsville ISD should develop a procedures manual to guide safety and security operations in the district.

The executive director of school improvement should draft a comprehensive safety and security manual for the district by collaborating with the superintendent to outline the areas for procedure development, including the following elements:

- roles and responsibilities of security staff;

- expectations for the district safety and security committee;

- reporting and monitoring incidents;

- process for conducting, reviewing, and reporting safety audits;

- process for making safety and security recommendations;

- monitoring compliance with regulatory requirements;

- safety and security service contracts and vendor evaluation; and

- collecting community input regarding safety and security issues.

The executive director of school improvement should review procedures manuals from other school districts and national standards to assist in identifying guidelines to include in the Kingsville ISD's manual. The superintendent should present the outline to the board for additional input and provide examples of procedures manuals from other districts. After the board has approved the procedures manual's direction, the executive director of school improvement should draft it for the superintendent's review and modifications. The superintendent should submit the final draft to the board for approval and adoption.

The human resources director should update the executive director of school improvement's job description to include major safety and security roles and responsibilities. The superintendent and the executive director of school improvement should review compliance or statutorily related updates and best practices regularly to ensure that all required safety and security expectations are met.

Since the review team's onsite visit, Kingsville ISD staff reported that the district has implemented written safety procedures and clearly defined roles for safety management. Staff also reported that the district has established a Safety and Security Team that oversees emergency planning, emergency drill training and monitoring alarm and public address system updates, fire code compliance, safety audits, and threat assessments.

The district could implement this recommendation with existing resources.

SAFETY AND SECURITY COMMITTEE (REC. 23)

Kingsville ISD has not established a formal safety and security committee as required by statute.

The Texas Education Code, Section 37.109, requires each school district to maintain an active safety and security committee (SSC) that meets at least three times per calendar year. Statute specifies the responsibilities of SSC members in accordance with the Texas School Safety Center's (TxSSC) guidelines:

- participate in the development and implementation of the district's emergency plans;

- provide periodic recommendations to the board and district administration to update the district's EOP;

- supply any campus, facility, or support services information required to the district for the completion of its safety and security audit;

- review each report the district submits to TxSSC;

- consult with local law enforcement agencies;

- select where bleeding controls stations are to be placed in schools;

- meet together at least once each academic semester and during the summer; and

- complete training on psychological first aid.

The Texas Education Code, Section 37.109, and Board Policy CK (LEGAL) require the district's SSC to include the following members, to the greatest extent practicable: the superintendent; the board president; a second member of the district's board; one or more representatives of the district's police department; one or more representatives of the local police department or sheriff's office; one or more representatives of the city or county office of emergency management; one or more designees of the superintendent, one of whom must be a classroom teacher in the district; and two parents or guardians of students enrolled in the district.

According to interviews with district staff and documentation provided by the district, Kingsville ISD does not maintain an SSC. For the school year 2021–22 EOP, a team of various district administrators met to develop the plan. However, that team was not an official SSC and did not include membership from external emergency or law enforcement personnel, board members, teachers, or parents.

Kingsville ISD maintains threat assessment committees, or threat assessment and safe and supportive teams, for each campus in the district, in compliance with the Texas Education Code, Section 37.115; Board Policy FFB (LEGAL); and Board FFB (LOCAL). These teams, facilitated by the executive director of school improvement and including district and campus staff, identify and support students who may be at risk of being threats to themselves or others. The teams meet regularly with the executive director of school improvement, have documented procedures and expectations, and have documented agendas and meeting minutes. These teams focus on student welfare and crisis intervention, and although they are essential, required components of safe Texas schools, they do not fulfill the roles or statutory requirements of an SSC.

Without maintaining an SSC, the district is not compliant with state statute and district policy. In the absence of an SSC, the executive director of school improvement is carrying out many of the key roles of the committee, such as overseeing EOP development and drill monitoring, safety and security audits, and making safety and security recommendations to the board and district administrators. As a result, the district is making safety and security decisions without sufficient stakeholder representation and input. The executive director of school improvement is tasked with additional duties, and the district risks the neglect, delay, or ineffective attention to critical safety and security functions. The failure to include city and county officials on an SSC limits the district's coordination efforts during an emergency.

Additionally, without an active SSC that includes members of law enforcement and emergency management organizations, the district is depriving itself of the broad safety and security knowledge these representatives could offer. Appointing SSC members from external organizations also would help the district build community partnerships that could support the district during a crisis and could help it to complete and submit key safety and security documents to the board or appropriate state entities.

TxSSC's website includes School Safety and Security Committee Guidelines and frequently asked questions as resources for Texas school districts. The website also includes *A Parent's Guide to School Safety Toolkit*. Statute establishes the frequency of SSC meetings as once per semester and once in the summer. Effective districts document committee meetings, maintain records in accordance with district policy, and develop a communication plan to disseminate committee information to stakeholders.

Cuero ISD has a page on its website for its SSC that includes current membership, meeting dates and times, and a summary of committee responsibilities. The SSC has a diverse membership, as required by the Texas Education Code, Section 37.109 (a–1), which includes administrative district staff, campus leadership, board members, parents, a teacher, and three representatives from external organizations, including the Cuero Police Department, the Texas Department of Public Safety, and DeWitt County Emergency Management. The district posts the meeting agendas to inform the public of topics that will be discussed and to provide the opportunity for community representatives to voice safety and security concerns.

Kingsville ISD should form a safety and security committee to formalize safety and security processes in the district.

The superintendent should appoint appropriate district staff to the SSC and coordinate with the board on the roles of the board president and a second board member for the SSC. The superintendent should identify parents that could serve on the SSC and coordinate with city, county, and emergency management officials regarding the proposed committee.

The executive director of school improvement should administer the SSC responsibilities to maintain a current roster of committee members, schedule meetings, develop meeting agendas, post meeting dates to the district website, and keep a record of meeting minutes.

The SSC should review the district's EOP annually and present its recommendations to the board and collaborate with the executive director of school improvement to develop and implement new emergency procedures as needed.

The district could implement this recommendation with existing resources.

SAFETY AUDITS (REC. 24)

Kingsville ISD lacks a formal process to conduct safety audits and implement recommendations in a timely manner.

The Texas Education Code, Section 37.108, requires school districts to conduct a safety and security audit at least once every three years and to report the findings as part of the district audit report (DAR) to TxSSC. A safety and security audit provides an overview of facility safety and security by identifying areas that need improvement and those that are commendable. TxSSC recommends that each district should establish a safety audit team to complete its DAR; the team should include administrators, teachers, nurses,

counselors, first responders, local subject matter experts, maintenance staff, custodial staff, transportation staff, and other district staff.

In December 2020, Kingsville ISD staff reported to the TxSSC that no safety and security audits had been conducted for any district campuses or noninstructional facilities for the 2017 to 2020 DAR cycle. In March 2021, the district contracted with regional Education Service Center II (Region 2) to conduct its required safety audit. Region 2 staff reviewed documents and observed the physical security of all instructional and noninstructional facilities in the district. The Region 2 staff produced written reports for the district summarizing the findings of the audit for the district overall and for each district facility . These reports are comprehensive and informative. However, district staff reported to the review team in March 2022 that these reports had not been presented to the board or disseminated to campus administrators. The executive director of school improvement said that he intended to present the audit findings to the board at the April 2022 regular board meeting and was not able to release the results to staff before the board's approval.

A district's SSC is responsible for tasks related to the audit process for safety and security. According to statute and Board Policy CK (LEGAL), the SSC is responsible for the following activities:

- providing the district with any campus, facility, or support services information required in connection with a safety and security audit, a safety and security audit report, or another report required to be submitted to TxSSC; and

- reviewing each district report required to be submitted to TxSSC to ensure that the report contains accurate and complete information regarding each campus, facility, or support service in accordance with TxSSC's criteria.

As discussed previously, Kingsville ISD has not established an official SSC, nor has it tasked any existing committee with these required responsibilities regarding safety audits.

During the review team's onsite visit in March 2022, the team observed the following safety and security issues that were unresolved from the previous school year's safety audit:

- insufficient training for students and staff;

- lack of required signage related to firearms;

- inadequate materials for landing areas beneath playground equipment;

- open access points to campuses;

- safety issues in career and technical education classrooms; and

- insufficient procedures to ensure that external doors are secure.

District staff said that they have not established a clear implementation plan to address the safety hazards, compliance issues, or improvements identified in the audit report.

According to staff, the district plans to continue contracting with Region 2 for future audit cycles and to continue with the process in place. However, the existing process resulted in lengthy delays in presenting the results of the audit to the board, disseminating the relevant recommendations to stakeholders such as campus principals, and implementing audit recommendations. Such delays expose students and staff to potential hazards. In the absence of an effective process for conducting and implementing safety audits, the district may delay responses to identified risks to students and staff and may risk being noncompliance with required reporting timelines.

TxSSC provides a comprehensive School Safety and Security Audit Toolkit that provides an overview of the audit process, guidance for establishing and training an audit team, instructions for conducting school safety and security audits with facility observation checklists, and information on writing audit reports and protecting sensitive data. The resource also includes instructions for reporting audit results to the board and to TxSSC.

According to TxSSC, following an audit, a district-level report should be presented to the board to share the audit results. The decision of what to report and how to report it to the board in a meaningful way is determined by the district's needs. Smaller districts may be able to provide a brief summary by school, campus, or facility. Presentation of the audit results to the board may be conducted in a closed session to limit the sharing of information regarding specific vulnerabilities of a school, facility, or district. In addition, as hazards are identified that might pose a danger to lives or property, the board must be notified in a timely manner, in accordance with local district guidelines. Data collected from the audits should be used to assess the safety and security of a district's facilities and address any concerns that may have

been discovered. The audit should be used as a tool to help the district develop a process and timeline to address safety and security issues.

Kingsville ISD should establish a process for evaluating and implementing the results of district safety assessments.

After the district establishes its SSC, the committee should meet regularly to assess the findings of safety audit reports. The committee should prioritize the findings into risk levels from high to low based on the degree of safety risk the findings present. The SSC should then develop an action plan and an implementation schedule to address safety and security issues, beginning with those that present the greatest risk. The SSC should present the action plan and schedule to the superintendent for approval. A representative of the committee should present the superintendent-approved action plan and schedule to the board. The superintendent should designate district staff to oversee each action plan and ensure that it is completed within the scheduled period.

The superintendent and executive director of school improvement should establish and document the safety audit process, including developing timelines for conducting, reporting, and implementing safety audit recommendations. The CFO should conduct a cost-benefit analysis of contracting with Region 2 to conduct audits compared to building this capacity among district staff using TxSSC resources. The superintendent should monitor the developing audit process to ensure timely auditing and reporting.

Since the review team's onsite visit, staff reported that Kingsville ISD has established a formal process to conduct safety audits and implement recommendations. Further, staff stated that as part of the new process, the results of any district safety assessments/audits must be presented to the district's School Safety Committee and that the district has completed several safety audits, drills, and its Emergency Operations Plan for school year 2022–23.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

EMERGENCY DRILLS FOR NONINSTRUCTIONAL FACILITIES

Kingsville ISD provides guidance and monitoring for emergency planning and communication; however, the district does not conduct emergency drills at noninstructional facilities.

The district provides clear guidance and documentation forms to campus and department administrators related to mandated emergency drills required by the Texas Administrative Code, Title 19, Part 2, Chapter 103, Subchapter CC, Section 103.1209. Following emergency drills, campus administrators conduct reviews to discuss the drills and plan for improvements. These review forms are submitted to the executive director of school improvement, who reported that he regularly monitors documentation of required drills. However, Kingsville ISD does not conduct any emergency drills to prepare staff working at noninstructional facilities for potential emergencies.

The district provides office space for staff in the administration building, the transportation building, the warehouse, and the maintenance building. However, none of these staff participate in emergency-preparedness drills. The district should expand its support and monitoring of emergency-preparedness drills to include all noninstructional facilities where staff or students may be present. The executive director of school improvement could assign the transportation foreman, who is a contact for the EOP, to facilitate, evaluate, and document drills for staff at all noninstructional facilities.

STAFFING

According to district staff, Kingsville ISD has not established staffing levels for safety and security positions. Multiple staff reported that the district may be understaffed in this function or staffed with an ineffective distribution of position type. However, district administrators have not evaluated the current staffing levels regarding security. As the district implements recommendations from its contracted staffing analysis, it should consider options for safety staffing. This analysis should consider the types of security staff, including the comparison of district staff, contracted law enforcement, or in-district police department staff, to best meet the needs of the district's students and staff.

FISCAL IMPACT

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

7. INFORMATION TECHNOLOGY MANAGEMENT

FINDINGS

♦ Kingsville ISD does not have a completed long-range technology plan.

♦ Kingsville ISD's Technology Department lacks processes for safety and disaster planning.

♦ Kingsville ISD's technology support staff do not receive adequate training and support to perform their duties effectively.

♦ Kingsville ISD does not have an effective inventory management process to track administrative and instructional devices.

♦ Kingsville ISD's help-desk system processes do not support campuses effectively.

♦ Kingsville ISD lacks adequate staff and training on the state Public Education Information Management System to ensure the accuracy of data submissions.

♦ Kingsville ISD does not have an effective process to update required website postings.

RECOMMENDATIONS

♦ **Recommendation 25: Finalize the district's long-range technology plan and evaluate its progress to meet goals annually.**

♦ **Recommendation 26: Develop a cybersecurity plan and a technology disaster-recovery plan, and update these plans regularly.**

♦ **Recommendation 27: Develop a manual for technology-related standard operating procedures, set expectations for the campus technology assistant positions, and provide staff in this position with the necessary training.**

♦ **Recommendation 28: Develop written inventory procedures and establish a comprehensive inventory of all technology devices.**

♦ **Recommendation 29: Develop written procedures for submitting help-desk requests and train staff on these procedures.**

♦ **Recommendation 30: Evaluate the position requirements and salary for the Public Education Information Management System specialist position and develop a succession plan that includes ongoing training for staff with responsibilities related to using the system.**

♦ **Recommendation 31: Develop a process to review and update required postings to the district website regularly.**

BACKGROUND

An independent school district's technology management affects its operational, instructional, and financial functions. Technology management requires planning and budgeting, inventory control, technical infrastructures, application support, and purchasing. Managing technology is dependent on a district's organization. Larger districts typically have staff dedicated to administrative or instructional technology responsibilities, and smaller districts may have staff responsible for both functions.

Administrative technology includes systems that support a district's operational, instructional, and financial functions (e.g., financial management, human resources, payroll, student attendance, grades, and Public Education Information Management System reporting). Administrative technology improves a district's operational efficiency through faster processing, increased access to information, integrated systems, and communication networks. Instructional technology includes the use of technology as part of the teaching and learning process (e.g., integration of technology in the classroom, virtual learning, and electronic instructional materials). Instructional technology supports curriculum delivery, classroom instruction, and student learning.

Kingsville Independent School District's (ISD) Technology Department consists of 11 staff, led by the director of technology and communication. The Legislative Budget Board's School Performance Review Team visited the district in March 2022. At the time of the onsite visit, the Public Education Information Management System (PEIMS) specialist and the public relations and family outreach positions were vacant.

FIGURE 7–1
KINGSVILLE ISD TECHNOLOGY DEPARTMENT ORGANIZATION
SCHOOL YEAR 2021–22
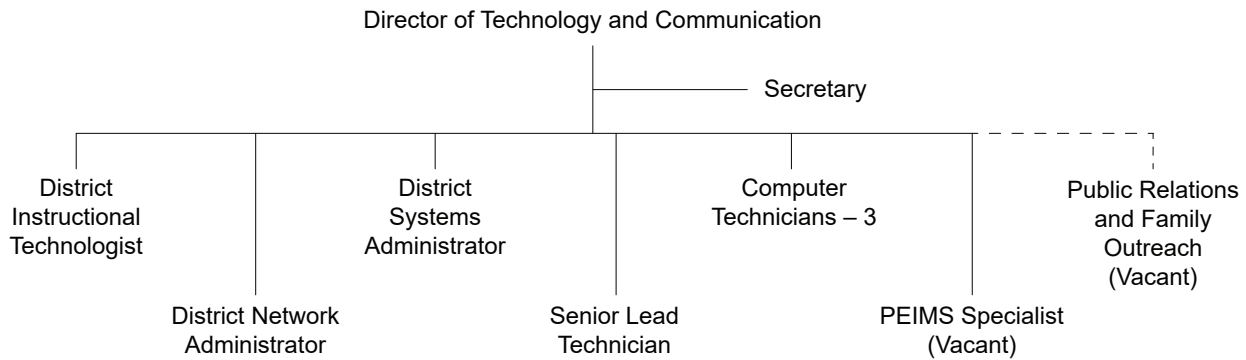
NOTES:
(1)   PEIMS=Public Education Information Management System.
(2)   Two computer technicians are full-time employees; the third is a part-time employee.
(3)   The public relations and family outreach position would report to the director of technology and communication for public relations
        responsibilities and to the executive director of school improvement for family outreach responsibilities.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

Technology Department staff are officed in the district's administrative building, and the computer technicians travel to campuses or additional district buildings to resolve technology issues. Kingsville ISD has five instructional campuses, a disciplinary alternative education program campus, and one administrative building. All Technology Department staff are full-time positions, except for one part-time computer technician position. **Figure 7–1** shows the organization of the Technology Department.

The Technology Department is responsible for maintaining and securing the district's network, managing the district's telecommunication tools, Internet connectivity, technology device inventory, device distribution to campuses, maintaining the website, and broadcasting Kingsville ISD Board of Trustees meetings. The department also has a help-desk system for district staff to request support with technology issues or request approval for technology purchases. Technology staff also support students and families when they report issues with their district-issued wireless communications hot spots or laptop computers.

The Technology Department's instructional responsibilities include setting up instructional equipment for teachers, such as printers and document cameras, and collaborating with the Curriculum and Instruction Department on interfacing instructional software with the district's network. The department also maintains student online enrollment and submits PEIMS data to the Texas Education Agency (TEA) as required by statute.

Figure 7–2 shows the general funds allocated for technology for school years 2017–18 to 2021–22. During these five school years, the percentage of Kingsville ISD's general fund allocated to technology increased from 0.9 percent to 1.6 percent.

DETAILED FINDINGS

LONG-RANGE PLANNING (REC. 25)

Kingsville ISD does not have a completed long-range technology plan.

The technology subcommittee of the district education improvement committee is responsible for developing the district's long-range technology plan. The subcommittee includes the director of technology and communication, the executive director of school improvement, teachers, the middle school instructional teacher coach, and a community representative. The subcommittee does not include additional technology staff, but staff reported that the subcommittee may request their input.

When the review team visited the district in March 2022, the district had a draft of its three-year technology plan. The director of technology and communication said that the superintendent had not reviewed the plan in depth. The plan includes the district's mission and vision statements, the plan parameters, tools to be used in the needs assessment process, a list of items that support the district's network and telecommunications, and existing technology needs. The

FIGURE 7–2
KINGSVILLE ISD'S GENERAL FUND ALLOCATED TO TECHNOLOGY
SCHOOL YEARS 2017–18 TO 2021–22
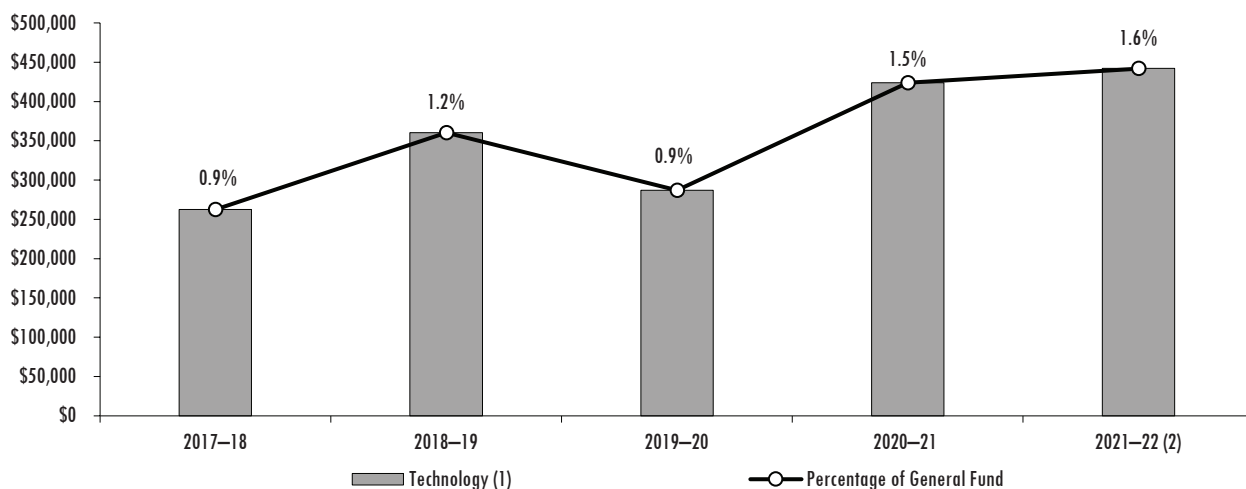
NOTES:
(1)   The technology budget represents the district's allocation of general funds to data process services (Function 53) in the Public Education Information Management System.
(2)   School year 2021–22 data shows budgeted amounts.
SOURCE: Texas Education Agency, Public Education Information Management System; school years 2017–18 to 2021–22.

plan also includes four district goals and provides several strategies to meet each goal.

Although this draft three-year plan contains some elements of a long-range technology plan, it is missing several key components. **Figure 7–3** shows Kingsville ISD's current draft plan compared to an example of a best practice for a five-year, long-range plan.

Additionally, Kingsville ISD's plan does not show a connection from stated goals to the district's current instructional and administrative devices, a replacement cycle, or teacher technology usage and competency expectations. Planning for replacement should become a priority for Kingsville ISD; multiple staff reported that staff devices are limited or outdated. At one campus that received new laptop computers, staff reported that the district did not provide the necessary cables to connect the new laptops to existing hardware, such as document cameras or printers. As a result, staff used old laptop computers or purchased the necessary cables with their own money.

In addition, Kingsville ISD may not support student instruction and instructional staff effectively because it lacks a long-range technology plan that includes staff responsible for goal completion, funds allocated to technology devices and training, and actionable steps to

FIGURE 7–3
COMPARISON OF KINGSVILLE ISD'S LONG-RANGE TECHNOLOGY PLAN COMPONENTS TO BEST PRACTICE
SCHOOL YEAR 2021–22

BEST PRACTICE COMPONENTS	KINGSVILLE ISD'S DRAFT
Mission and vision statements	Yes
Needs assessment findings	Yes
Goal or objectives	Yes
Steps or strategies to meet goals and objectives	Yes
Staff responsible for meeting goals and objectives	No
Timeline	No
Funding sources	No
Success measures	No

SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

accomplish the goals. For example, the district lacks teacher usage and competency standards, and as a result, teachers are trained inadequately on using district-owned devices and cannot maximizing their use. Principals said they monitor technology usage through walkthroughs and application usage reports. One principal said the district's interactive whiteboards are used as projector screens because

staff did not receive ongoing training on their use, and the associated software was not updated when needed.

Granbury ISD developed a long-range technology plan, which is posted on the district's website. The 2018–23 plan includes the best-practice components shown in **Figure 7–3** and updates for each school year in the period. The technology director presents the technology plan for the following school year to the Granbury ISD Board of Trustees at the December board meeting.

Kingsville ISD should finalize its long-range technology plan and evaluate its progress to meet goals annually.

The director of technology and communication should complete the following activities:

- collaborate with the technology subcommittee, the district instructional technologist, the assistant superintendent of curriculum and instruction, and campus principals to set teacher technology usage and competency expectations, and determine teacher training needs to achieve district goals and support student instruction;

- develop a device replacement plan for the district; and

- collaborate with the chief financial officer (CFO) to determine funding necessary to accomplish the district's technology goals.

For each goal in the long-range technology plan, the technology subcommittee, the superintendent, and the assistant superintendent of curriculum and instruction should include the level of priority, a timeline, how the district will evaluate progress, and staff responsible for meeting goal progress. The district should evaluate its progress in meeting technology goals annually. The director of technology and communication should present the finalized long-range plan to the superintendent and the board for approval and update the board annually on the district's progress.

The district could implement this recommendation with existing resources.

Since the review team's onsite visit, staff reported that the district educational improvement committee will be responsible for developing, reviewing, and updating the long-range technology plan with support from the Technology Department.

SAFETY AND DISASTER PLANNING (REC. 26)

Kingsville ISD's Technology Department lacks processes for safety and disaster planning.

Kingsville ISD's Technology Department employs safety measures, such as firewalls and web content filters to protect the district's technological network. However, the district does not have a cybersecurity plan to guide the department on securing equipment and data, determining cybersecurity risk, implementing appropriate mitigation planning, and protecting the district's network against cybersecurity incidents. At the time of the onsite visit, technology staff reported that the director of technology and communication is developing a process to evaluate the district's cybersecurity needs and implement a cybersecurity plan.

Without a cybersecurity plan, Kingsville ISD may not be able to identify and correct vulnerabilities in a timely manner, which could make the district susceptible to data loss or theft that could compromise educational, financial, and operational information.

TEA's Texas Gateway website provides information, webinars, and tools related to cybersecurity. It also includes the Texas Cybersecurity Framework to help districts identify, protect, detect, and respond to vulnerabilities in their networks.

Fort Hancock ISD has a detailed cybersecurity plan that contains an annual vulnerability assessment questionnaire and lists steps the district has taken to protect its equipment and network. Additionally, the plan includes procedures for technology staff to initiate new user accounts, receive deliveries, deploy hardware and software, discard equipment properly, and prevent unauthorized access to the district's network.

Additionally, Kingsville ISD does not have a technology disaster-recovery plan, which guides a district on how to respond to unplanned incidents that affect a district's technology infrastructure, such as natural disasters, power outages, and other disruptive events. A technology disaster-recovery plan includes strategies for effectively restoring hardware, applications, and data in case of disruption. For example, several staff reported that the Kingsville ISD administration building is located in an area of the city that is prone to electrical outages. Staff reported that the life of the district's battery-powered backup for its servers is from one to four hours. The district's electric power was disrupted twice during school year 2021–22, during which staff reported that Internet access was disrupted for several hours

each time while the Technology Department worked to restore server operations.

When servers are shut off improperly, results could include software damage and data loss. These losses could require the district to shut down temporarily and could delay crucial operations, such as payroll. Effective districts have implemented plans and steps to prevent damage, recover lost data, and restore operations as quickly as possible after a disruption. The U.S. Agency for International Development provides guidance on how to select an uninterruptible power source based on an organization's needs.

Liberty County School District in Florida has a technology disaster-recovery plan that identifies the names and contact information of key district staff and includes contact information for external organizations that support the district. The plan also includes the district's server backup strategies, the responsibilities of the disaster-recovery team, and an assessment of potential disaster risk and the systems that could be affected.

River Road ISD's information technology disaster-recovery plan includes detailed steps and timelines for damage assessments, technology equipment and data recovery, and establishing district network operations at a remote location. The plan also specifies how technology department staff will work to minimize data loss during transition events.

Kingsville ISD should develop a cybersecurity plan and a technology disaster-recovery plan, and update these plans regularly.

The director of technology and communication, the district network administrator, and the district systems administrator should perform the following tasks:

- use the information and tools available at TEA's Texas Gateway website to develop a cybersecurity plan that includes a list of items to check regularly and update as needed;

- collaborate with the superintendent, the CFO, and the PEIMS specialist to develop a technology disaster-recovery plan including detailed steps to assess network and equipment damage and restore district operations as soon as possible after a disruption; and

- develop a process to review, test, and update the cybersecurity and technology disaster-recovery plan annually.

The superintendent and the executive director of school improvement, who serves as the district safety officer, should provide input on the cybersecurity plan and the technology disaster-recovery plan, as needed.

Additionally, the director of technology and communication should determine the type of uninterrupted power source needed to maintain power to the district's servers if a power outage occurs. The uninterrupted power source can be a battery or a combination of a battery and a generator. The battery capacity should be based on the number of servers the district has and the amount of time that the power is likely to be disrupted. The director of technology and communication should collaborate with the superintendent and the CFO to purchase an interrupted power source that best fits the district's needs.

The district could implement part of the recommendation with existing resources. The cost to the district for a server power source will depend on the source it selects based on its needs.

Since the review team's onsite visit, staff reported that the district educational improvement committee will be responsible for developing, reviewing, and updating the cybersecurity and technology disaster-recovery plans with support from the Technology Department. Additionally, the district has drafted a cybersecurity and technology disaster-recovery plan.

The district also purchased batteries as an uninterrupted power source for its administrative building. Staff reported that the batteries are also used at the campuses. Furthermore, the district is establishing a redundancy process for its Internet connection to sustain basic telecommunication functions during a power outage.

TRAINING AND PROCEDURES (REC. 27)

Kingsville ISD's technology support staff do not receive adequate training and support to perform their duties effectively.

Technology Department staff reported that new staff are trained on the job through shadowing and are encouraged to take their own notes. Staff do not receive any ongoing training to grow their expertise in new technology areas. Although the department has manuals for setting up certain equipment, the Technology Department does not have a standard operating procedures manual. The department relies on veteran staff knowledge and experience to troubleshoot technology problems in the district. Technology

is a fast-growth area, and without a procedures manual and regular training, new staff may require more time than veteran staff to resolve technology issues. For example, the review team's campus staff survey results show that 33.3 percent of campus staff agree that "help-desk tickets are resolved effectively and in a timely manner."

In addition to Technology Department staff, Kingsville ISD employs campus technology assistants to provide support for common issues, such as connecting to the Internet and troubleshooting printer errors. Campus technology assistants have limited administrative rights to reset passwords and update software, and assist with the campus device inventory process. At the end of school year 2020–21, Kingsville ISD leadership closed two of the districts' campuses to decrease spending. Office staff from the closed campuses were transferred to other campuses and reassigned as attendance clerks with part-time duties as campus technology assistants. Staff reported that the attendance clerks were assigned these technology responsibilities based on their perceived availability to fulfill both roles, not based on technology skills or qualifications. The district intended for campus technology assistants to support staff and resolve technology issues in a timely manner, which would limit the number of help-desk tickets that are submitted to the Technology Department. However, according to staff reports, attendance clerks received little to no training on troubleshooting technology issues. Each campus principal determines technology assistants' duties, but staff reported receiving minimal guidance on their technology role and have no documented procedures to guide their duties.

The lack of training and support for campus technology assistants inhibits these staff from carrying out their duties effectively. One campus principal reported that the workload of an attendance clerk is devoted to attendance duties, not address technology issues. At another campus, the instructional teacher coach assumed the technology assistant responsibilities because the attendance clerk did not have the necessary skills.

Without technology standard operations and position-specific procedures manuals, Kingsville ISD risks losing institutional knowledge if staff decide to leave the district or retire. Without a formal definition of the technology assistant role, attendance clerks do not have clear expectations regarding the expertise and training required to be effective campus technology assistants. Additionally, without comprehensive training and a guide to support the campus technology assistant role, technology issues may

not be resolved adequately or in a timely manner, which can affect instruction.

Effective districts provide clear job expectations to their staff and provide them with the necessary training to be successful in their roles. Standard operating procedures manuals help to ensure that staff know the expectations for a department and streamline training for new staff.

Fabens ISD posts its technology-related standard operating procedures on its website. The procedures include guidelines for passwords, email, purchasing hardware and software, and equipment repurposing, disposal, and checkout. A position-specific procedures manual includes job expectations, hardware and software applications used by the district, and solutions to common technology issues. The position-specific manual helps guide new staff on how to perform their duties with minimal training if the district has unexpected staff turnover. Bloomington ISD has a guide to resolving common technology issues posted on its website. The guide includes steps for troubleshooting an unresponsive computer screen, printing errors, login issues, and how to connect a computer to a secondary device.

Kingsville ISD should develop a manual for technology-related standard operating procedures, set expectations for the campus technology assistant positions, and provide staff in this position with the necessary training.

The director of technology and communication should complete the following activities:

- develop a standard operating procedures manual for the Technology Department;

- require technology staff to develop position-specific procedures manuals for their positions. The senior lead technician and the computer technicians should collaborate on one procedures manual for the computer technician role. The process for developing the procedures manuals should include a timeline including regular progress checks and completion date; and

- collaborate with the CFO to ensure that budgeted funds are allocated to ongoing technology staff training.

The senior lead technician should complete the following activities:

- collaborate with campus principals to establish the roles and responsibilities of the technology assistant position;

- develop a technology questionnaire for campus staff to determine which staff have the necessary skills for the technology assistant position. The questionnaire should include questions regarding basic troubleshooting, cybersecurity, interest in the position and in participating in additional training, and the availability to perform the technology assistant duties; and

- provide the necessary training to the technology assistants to support campus staff.

Additionally, the senior lead technician should collaborate with the computer technicians to develop a step-by-step guide for all staff to use to resolve simple technology issues, including connecting a computer to a printer or document camera, taking a screenshot on a computer, or rebooting a computer when necessary. The senior lead technician should coordinate with the district instructional technologist to post the guide on the district website and notify staff of its availability.

The district could implement this recommendation with existing resources.

INVENTORY (REC. 28)

Kingsville ISD does not have an effective inventory management process to track administrative and instructional devices.

The computer technicians are responsible for maintaining the inventory of district computers, document cameras, projectors, and interactive whiteboards. The technicians affix a tag with an assigned number to track each device. Technology staff reported that campuses are responsible for performing device inventory annually and reporting the results to the Technology Department. The Technology Department maintains individual spreadsheets to manage device inventory for each campus and the administrative buildings, but it does not have a comprehensive inventory for the district.

The district did not provide the review team a comprehensive inventory or individual campus inventories of its instructional and administrative devices. The director of technology and communication provided a list of laptop computers that the district purchased at the beginning of school year 2021–22 and distributed at two of its five campuses. The list includes the specifications of the devices, their assigned district tag numbers, the type of funds used to purchase the computers, and the shipping dates. The laptops were assigned to

classrooms, but the list does not state if they were for student use or if any were assigned to teachers.

The district also does not have a standardized process for campus staff to track inventory. Campus staff reported differences in how often inventory is performed and who is responsible. Inventory responsibilities may be performed by campus secretaries, librarians, technology assistants, instructional teacher coaches, assistant principals, or principals. Several staff reported that inventory is performed annually; some staff reported that it is performed at least twice per school year and when campuses receive new devices. When Kingsville ISD closed two of its campuses at the end of school year 2020–21, the technology devices at those campuses were redistributed to the open campuses. However, one campus staff reported that inventory has not been updated to incorporate these additional devices. Three principals reported that school year 2021–22 was their first year as principals at their campuses; therefore, they do not have historical data of the inventory processes. Without uniform guidance from the Technology Department, the district cannot ensure accurate inventory of campus devices.

Without a comprehensive inventory of instructional and administrative technology devices, Kingsville ISD cannot track its devices. The district might repeat purchases of the same items, causing unnecessary spending. Additionally, maintaining the inventory on individual spreadsheets can be time-consuming and prone to human error, and the result could be an inaccurate count of district devices.

Information included in effective inventory management should include device tag number, the condition of the device, type of device, description of the device, type of funds used to purchase the device, the manufacturer and model, serial number, where it is located and its status, the purchase or acquisition date, and the initial cost of the device. Property management systems help streamline the inventory process and enable staff to input immediate inventory changes into a system for all technology staff to access.

Kingsville ISD should develop written inventory procedures and establish a comprehensive inventory of all technology devices.

The director of technology and communication and the senior lead technician should develop a comprehensive inventory of all district-owned devices and add any necessary descriptive information. The senior lead technician should develop written inventory-taking procedures for all campuses and administrative buildings. The director of technology and

communication should review the completed procedures and communicate them to campus principals and campus staff. Procedures should include a timeline for when to perform inventory and when staff should report inventory changes to the Technology Department.

Additionally, the director of technology and communication and the senior lead technician should evaluate if an inventory management application would fit the district's needs and reduce the possibility of human error. If it would, they should determine if the district's existing applications, such as SchoolDude or eFinance, have inventory management modules that could assist in tracking these assets.

The district could implement this recommendation with existing resources.

Since the review team's onsite visit, staff reported that Kingsville ISD developed a system to store all portable device information through its library management system. Staff also said that the Technology Department developed a comprehensive inventory list from individual campus spreadsheets that include the device serial number, assigned district tag number, grant number, and staff to whom the device has been assigned, including their employee number, and assigned campus.

HELP-DESK SYSTEM PROCEDURES (REC. 29)

Kingsville ISD's help-desk system processes do not support campuses effectively.

Kingsville ISD has an online application for staff to submit help-desk requests to the Technology Department to resolve technology issues. However, only campus principals, assistant principals, secretaries, and technology assistants at each campus have administrative rights to submit a help-desk request. When staff need assistance, they are required to submit a paper work order form manually to the campus secretary or technology assistant to review for proper completion and they will submit the request for assistance. The work order includes the following information:

- name of staff requesting assistance, and the staff's email address and room number;

- the type of problem staff are experiencing, such as whether the issue is related to a printer, password, wireless communications connection, or instructional program;

- a description of the problem; and

FIGURE 7–4
KINGSVILLE ISD HELP-DESK REQUESTS DECLINED
FISCAL YEARS 2019–20 TO 2021–22

YEAR	DECLINED	TOTAL	PERCENTAGE DECLINED
2019–20	60	1,326	4.5%
2020–21	92	1,205	7.6%
2021–22 (1)	79	845	9.3%

NOTE: (1) Data for fiscal year 2021–22 shows requests received as of March 2022.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

- identifying information for the device, including brand, model, and the district's inventory tag number.

After the secretary or technology assistant receive the work order form, they troubleshoot the issue; if they cannot resolve the problem, they input the work order data into the help-desk application.

The senior lead technician reported that campus staff are aware that the Technology Department will decline incomplete help-desk requests. However, the district's help-desk data shows that the percentage of declined help-desk requests has increased from fiscal years 2019–20 to 2021–22. **Figure 7–4** shows the number of declined help-desk requests compared to the total received.

Technology staff reported that campus staff are notified when a help-desk request is declined or when an issue requires additional time to complete. However, instructional staff reported that they are not always informed when a request is declined, nor on the progress or timeline to resolve requests.

When help-desk procedures are not followed consistently, technology staff may require more time to resolve issues. Additionally, when staff are not informed on the status of their help-desk requests or when requests are declined, it may affect student instruction and staff satisfaction with the Technology Department.

Kingsville ISD should develop written procedures for submitting help-desk requests and train staff on these procedures.

The senior lead technician should perform the following tasks:

- develop a survey for campus staff to identify communication gaps between the Technology Department and staff requesting technology assistance, and determine whether the district's current

help-desk procedures are effective in communicating help-desk request status to staff;

- use the survey results to develop written procedures for staff requesting assistance and for the staff responsible for entering the help-desk requests into the online application to decrease the number of declined requests. Additionally, the senior lead technician should collaborate with the district instructional technologist to post these procedures on the district website and communicate their availability to all staff; and

- evaluate the help-desk application's statistics to determine if declined requests typically originate from a specific campus or staff and provide additional training to those staff as needed.

Additionally, the senior lead technician and computer technicians should collaborate with campus principals and the campus technology assistants to evaluate the help-desk request process that uses paper work order forms, and determine if an email or alternative electronic system would benefit the district and decrease paper use and costs.

The district could implement this recommendation with existing resources.

PEIMS STAFF (REC. 30)

Kingsville ISD lacks adequate staff and training on the state PEIMS system to ensure the accuracy of data submissions.

School districts are required to submit student academic and demographic data, and organizational and financial information to TEA annually. Kingsville ISD's PEIMS specialist is responsible for gathering the data, ensuring that staff and student information is identified correctly, amending errors, and submitting it to TEA. However, the position has been vacant since July 2021. Staff reported several reasons for the continued vacancy, including a lack of applicants with sufficient experience or education. The district requires a bachelor's degree and a minimum of five years' experience with PEIMS for the position, and the salary range offered is from $36,000 to $45,000.

This salary range may be too low to attract qualified candidates for the PEIMS specialist position. Staff reported that the board declined to offer an experienced applicant the position because the requested salary, which was comparable to what the applicant earned at another district as a PEIMS specialist, was $20,000 more than the maximum

salary that Kingsville ISD offers for this position. However, $65,000 appears to be in range with the salaries that Kingsville ISD's peer districts pay this position. For example, Alice ISD has a salary range of $61,031 to $74,060 for its PEIMS specialist position.

At the time of the onsite visit, the district systems administrator was performing the district's PEIMS duties without a pay increase or stipend for the added responsibilities. The administrator reported that PEIMS-related duties required 90.0 percent of the position's work hours. The Texas Association of School Boards provides general job descriptions for various job positions at districts statewide. For a district PEIMS specialist, responsibilities include ongoing data collection and input for districtwide PEIMS, examining data and amending errors, supporting campus PEIMS staff, and ensuring data accuracy for submission to TEA. These duties may constitute a full-time workload that the systems administrator performs in addition to primary responsibilities.

In July 2021, Kingsville ISD hired a consultant to evaluate the district's PEIMS function, including PEIMS procedures manuals for taking attendance and data submissions to the state. The district retained the consultant to assist the district systems administrator with PEIMS submissions and provide training to staff. This decision has prolonged the district's vacancy in hiring a PEIMS specialist. The district systems administrator collaborates with the consultant regularly. However, the meetings may be extended when the district is organizing data for PEIMS submission deadlines. The director of technology and communication reported that the consultant charges $85 per hour. Data provided by the district shows that, at the time of the onsite visit, the district had paid the consultant $20,000. Staff reported that the Technology Department has used all available funding to pay the consultant, and now the department is seeking additional funding sources to continue this retainer.

The July 2021 PEIMS Assessment report that the consultant submitted shows that district staff with PEIMS responsibilities need additional training. Principals determine which staff will perform PEIMS duties at their campuses, typically an attendance clerk or counselor. The high school registrar is a dedicated PEIMS staff. Staff reported that one PEIMS training was provided at the beginning of school year 2021–22. At one campus, staff said that the PEIMS staff received incorrect guidance from a supervisor regarding how to categorize PEIMS data by codes. For school year 2018–19, TEA did not provide Kingsville ISD an accountability rating due to data integrity

issues. During interviews, the director of technology and communication said the district previously has received four letters of corrective action from TEA. Without adequate training, staff may continue to make incorrect data submissions that could result in inaccurate enrollment projections or additional corrective actions from the state.

If the district's PEIMS specialist position remains vacant, Kingsville ISD continues to rely on the district systems administrator to perform PEIMS duties. The administrator may not have the expertise to fulfill the duties of this full-time position. Additionally, these duties limit the district systems administrator's ability to fulfill primary duties, which include managing the online student enrollment application, uploading information from departments' software applications to servers, and generating reports for various departments. The Technology Department can no longer fund retaining the PEIMS consultant through the department's budget, which could require the district systems administrator to perform PEIMS duties without assistance. The district also has not assigned staff to support a PEIMS specialist through absences nor does it have a succession plan if the district systems administrator exits employment with the district. The director of technology and communication said it would be detrimental if the district systems administrator left employment with the district.

Kingsville ISD should evaluate the position requirements and salary for the PEIMS specialist position and develop a succession plan that includes ongoing training for staff with responsibilities related to using the system.

The director of technology and communication should collaborate with the human resources (HR) director and the Texas Association of School Boards to perform a market analysis for the PEIMS specialist position. The HR director should use the results of the study to update the job description and requirements for the position and post the vacancy on the district's website.

After the district hires a PEIMS specialist, the position should collaborate with the superintendent, the director of technology and communication, the CFO, the accounting supervisor, and campus PEIMS staff to develop a succession plan for PEIMS responsibilities and determine training needs. The succession plan should specify which staff will perform the PEIMS specialist duties during absences.

The director of technology and communication should evaluate district and campus PEIMS staff's training needs and research training availability at a regional Education

Service Center that provides training on the district's PEIMS application. Additionally, the director of technology and communication and the CFO should perform the following tasks:

- evaluate the district's PEIMS software contract and ensure that contract renewals include training from the vendor; and

- budget for necessary PEIMS training.

The review team could not determine a fiscal impact for this recommendation. Any costs or savings would be based on the district's decision to increase the salary for the PEIMS specialist position and decrease or discontinue using the consultant's services.

Since the onsite visit, Kingsville ISD established a PEIMS supervisor position, which was filled in June 2022. District staff reported that the PEIMS supervisor responsibilities include collaborating with and training staff on attendance and PEIMS data reporting.

REQUIRED WEBSITE POSTINGS (REC. 31)

Kingsville ISD does not have an effective process to update required website postings.

One of the director of technology and communication's key responsibilities is managing the website and ensuring that required postings are current. The district instructional technologist also supports the website with informational updates, such as maintaining the staff directory. State and federal laws require that each district posts certain information on its website; however, out of 31 required postings the review team checked, 21 were missing or outdated on Kingsville ISD's website. **Figure 7–5** shows missing or noncompliant postings on the district's site.

The district's failure to update or include required website postings is noncompliant with state and federal laws.

Kingsville ISD should develop a process to review and update required postings to the district website regularly.

The director of technology and communication and the district instructional technologist should develop a checklist of required postings and a process for departments to submit the required data to the Technology Department annually or as needed to post the information on the website. The Texas Association of School Boards has a required postings checklist available on its website that could guide staff in developing a district-specific checklist.

FIGURE 7–5
KINGSVILLE ISD'S MISSING OR INCOMPLETE REQUIRED WEBSITE POSTINGS
SCHOOL YEAR 2021–22

POSTING	STATUTE	REASON FOR NONCOMPLIANCE
Main office contact information	The Texas Local Government Code, §140.008(f)(2)	Contact information is missing an email address
Texas Academic Performance Reports (TAPR)	The Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter BB, §61.1022(f)	The most recent TAPR, school year 2020–21, is not posted
TEA campus report cards	The Texas Education Code, §39.362(1)	Most recent posted report cards are for school year 2018–19
Performance report for district	The Texas Education Code, §39.362(2)	Not posted
Accreditation status and most recent performance rating	The Texas Education Code, §39.362(3), and the federal Elementary and Secondary Education Act, Title I, Part A, §1116	Not posted
Definition of each accreditation status	The Texas Education Code, §39.362(4)	Not posted
Annual Federal Report Card	The U.S. Code, Title 20, §6311(h)(2)	Most recent federal report card is from school year 2018–19
Group health coverage report and plan for district employees	The Texas Education Code, §22.004(d)	Not posted
Minimum personal leave program for district employees	The Texas Education Code, §22.003(c-1)	Employee Handbook posted is from school year 2020–21
Notice regarding ability to refuse entry or eject certain individuals and the appeals process	The Texas Education Code, §37.105(g)	Notice is not posted either on the district main website or the campus pages
PSAT/NMSQT and advanced placement tests (1)	The Texas Education Code, §29.916(c)	Dates for the PSAT/NMSQT are not posted; Instructions for home-schooled students to register for advanced placement tests are not posted
Policies and procedures that promote physical and mental health	The Texas Education Code, §28.004(k)(1)	Not posted
Policies for physical activity	The Texas Education Code, §28.004(k)(2)	Not posted
Number of times the district Health Advisory Committee has met in the past year	The Texas Education Code, §28.004(k)(3)(A)	Not posted
Policy regarding vending machines	The Texas Education Code, §28.004(k)(3)(B)	Not posted
District policies on tobacco products	The Texas Education Code, §28.004(k)(3)(C)	Not posted
Notice that parents can request their child's physical fitness assessment results	The Texas Education Code, §28.004(k)(4)	Not posted
Statement reporting whether each campus has a full-time nurse or counselor	The Texas Education Code, §28.004(k)(5)	Not posted
List of required and recommended immunizations	The Texas Education Code, §38.019(a)(1)(A) and (B)	Not posted
District health clinics offering the flu vaccine	The Texas Education Code, §38.019(a)(1)(C)	Not posted
Link to the Department of State Health Services website for parents to obtain information on claiming exemption from immunization requirements	The Texas Education Code, §38.019(a)(2)	Not posted

NOTE: (1) PSAT=Preliminary SAT, formerly Scholastic Aptitude Test; NMSQT=National Merit Scholarship Qualifying Test.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

DIRECTOR RESPONSIBILITIES

Kingsville ISD's director of technology and communication is responsible for ensuring that the district's network and communication tools are functioning, overseeing deployment of technology devices at campuses, and coordinating with the Curriculum and Instruction Department to provide instructional hardware and software to staff and students. The director also researches and applies for technology grants, assists computer technicians with help-desk requests as needed, and is the primary staff responsible for managing the district website.

At the time of the review, the director of technology and communication was performing some of the duties of the district's vacant public relations and family outreach position. These duties include photographing students for the website, managing social media accounts, and designing flyers and posters. The executive director of school improvement oversees the family outreach duties. Staff reported that the director's technology and public relations duties require about 70.0 hours or more per week. Staff reported that the public relations responsibilities require most of the director of technology and communication's work hours, and that some Technology Department functions are not performed effectively, such as maintaining required postings on the website, managing the department's budget, and evaluating campus technology needs. Although department staff report that they have taken the initiative to complete some of these tasks, the director has not delegated any responsibilities to ensure that department operations continue to function effectively.

The Technology Department has knowledgeable staff with years of experience in the district that do not have supervisory responsibilities. The director of technology and communication should delegate public relations duties when the public relations and family outreach position is filled. The director of technology and communication should also evaluate the director position's and technology staff's responsibilities and determine which staff to assign additional responsibilities and supervisory roles.

INTERFACING SOFTWARE

Kingsville ISD has several applications used by various departments that are not used to their maximum potential. Several staff reported that software for their departments does not interface effectively with the district's student information system, resulting in staff performing some duties manually. For example, the Transportation Department cannot use the routing feature of its transportation management software because some data is entered showing students as attending Memorial Middle School or Kleberg Elementary School, which no longer are used as instructional campuses. Food Service Department staff reported entering student information manually into the department's point-of-sale system because students' data are removed from the system when they are promoted by grade level to another campus. At one campus, staff reported that the library software used to borrow books also has outdated teacher and student classroom information. Kingsville ISD is limiting staff's ability to perform their duties efficiently by not ensuring that its student information system interacts effectively with departments' applications. Additionally, the district is spending funds on software it is underusing. The director of technology and communication and the district systems administrator should perform the following tasks:

- develop a survey for department administrators and campus staff to determine which campus and departments' applications do not interface effectively with the district's student information system;

- use the survey results to prioritize resolving software interfacing issues by department or campus; and

- develop a process to resolve the issues in a timely manner.

DISTRICT-ISSUED DEVICES

Kingsville ISD incurs additional costs due to damaged or stolen district-issued laptop computers. The director of technology and communication reported that parents and guardians sign contracts at the beginning of the school year committing to repaying the district if their student loses or damages a district-issued laptop. However, not all parents are able or willing to repay the cost of the device, which can range from $200 to $350.

One option Kingsville ISD could implement is to follow the model used in Richardson ISD (RISD). RISD contracts with a third-party company to insure district-issued devices and chargers at a lower cost to parents and guardians than repaying the cost of the device. RISD offers three pricing tiers based on a family's eligibility for the federally funded Child Nutrition Programs. RISD pays the difference for students that qualify for free and reduced-price meals. Parents and guardians pay for the computer insurance at the beginning of the school year, and the device is covered for that year. RISD staff reported that they are evaluating a transition to a self-insured program.

Kingsville ISD's director of technology and communication should collaborate with the CFO to evaluate the options for insuring district-issued laptops and chargers and select an option that best suits the district's financial needs.

FISCAL IMPACT

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

8. FOOD SERVICE MANAGEMENT

ACCOMPLISHMENTS

♦ The Kingsville ISD Food Service Department maintains a food service operations manual that standardizes kitchen procedures throughout the district.

♦ The Kingsville ISD Food Service Department has established effective processes for training and evaluating department staff.

FINDINGS

♦ Kingsville ISD lacks processes to evaluate and manage staffing levels in the Food Service Department.

♦ Kingsville ISD has not established expectations and measures for food service program performance.

♦ Kingsville ISD does not communicate effectively with food service stakeholders.

RECOMMENDATIONS

♦ **Recommendation 32: Evaluate the efficiency of Food Service Department staffing in the kitchens and in the warehouse.**

♦ **Recommendation 33: Establish a performance-measurement system that enables district leadership to evaluate the food service program and make informed decisions for the use of limited resources.**

♦ **Recommendation 34: Promote and support the Food Service Department by enhancing communication with students, staff, and the community and solicit customer feedback to identify needed improvements.**

BACKGROUND

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

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

Kingsville Independent School District (ISD) uses the self-management model and participates in the SBP and the NSLP, the Child and Adult Care Food Program, and At-Risk programs, collectively referred to as CNP. The district also receives donated foods through the USDA Foods in Schools Program and the USDA Department of Defense Fresh Fruit and Vegetable Program. For school years 2020–21 and 2021–22, the district applied for and received a waiver to operate the Seamless Summer Option (SSO) during the school year. The SSO enables districts that operate the NSLP and the SBP to feed students in low-income areas during the summer months with reduced paperwork and limited administrative burden. SSO was extended beyond the summer months and available for districts to use throughout the school year through a USDA waiver beginning in August 2020 in response to the COVID-19 pandemic. The most recent waiver expired June 30, 2022, and Kingsville ISD planned to resume operating the NSLP and SBP for school year 2022–23.

The Legislative Budget Board's School Performance Review Team visited the district in March 2022. At the time of the onsite visit, Kingsville ISD offered free breakfast and lunch to all district students through the SSO waiver. For school year 2022–23, the district will continue to offer free meals

to all students through the federal Community Eligibility Provision (CEP). The CEP is an option that enables School Food authorities and sites in low-income areas to serve breakfast and lunch at no cost to all enrolled students without collecting household applications. USDA reimburses school districts that implement the CEP according to the percentage of students the district identifies as categorically eligible for free meals based on their participation in qualifying programs, such as the Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, and Head Start. Migrant, homeless, and foster care students also are eligible categorically for free meals. Districts use a process called direct certification to identify the eligible percentage of enrolled students.

During school year 2021–22, Kingsville ISD had 2,805 students enrolled in prekindergarten to grade 12. The district has five cafeterias and six campuses. Harrel Elementary School, Harvey Elementary School, Perez Elementary School, Gillett Middle School, and King Early College High School each have their own cafeteria. Two of the campuses are satellite kitchens, and three are cooking kitchens. The Gillett Middle School kitchen prepares some meal items for Harrel Elementary School, and the King Early College High School kitchen prepares some meal items for Perez Elementary School. Pogue Options Alternative Academy does not have a cafeteria, and meals for these students are prepared at the Harvey Elementary School cafeteria and delivered daily by a food service warehouse driver.

The district has a food service warehouse that orders, receives, stores, and delivers food and paper supplies to most of the district's campuses. The Harvey Elementary School and Gillett Middle School kitchens are large enough to store all their food, and these kitchens order and receive their food directly from the distributor, except distributions from the USDA Foods in Schools Program. The district's warehouse receives, stores, and delivers USDA-distributed foods to all the campuses.

According to staff interviews, the department's budget typically equals its expenditures each year. However, Kingsville ISD's Food Service Department recorded financial losses for school year 2020–21. This change was attributed to lower meal participation because many students received remote instruction. Additionally, increased food costs due to product shortages during the onset of the pandemic contributed to financial losses.

FIGURE 8–1
KINGSVILLE ISD'S FOOD SERVICE DEPARTMENT ORGANIZATION
SCHOOL YEAR 2021–22
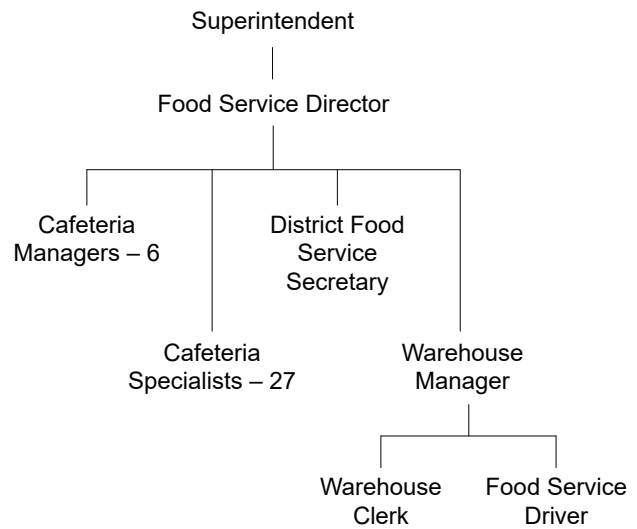
Sources: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

Kingsville ISD budgeted $2,475,230 for food service for school year 2021–22. At the time of the onsite visit, the food service director reported that the Food Service Department is financially stable and generated sufficient revenue to meet expenditures for school year 2021–22.

Kingsville ISD's Food Service Department has 38 staff, including a food service director, a district food service secretary, six cafeteria managers, one warehouse manager, one warehouse clerk, one food service driver, and 27 cafeteria specialists. The Food Service Department also employs two substitute food service workers to cover absences. **Figure 8–1** shows the district's reporting structure for the Food Service Department.

The food service director reports to the superintendent and is responsible for meal planning and execution, filing a monthly claim for federal reimbursement, and conducting direct certification to identify students that are categorically eligible for meals. The food service director also is responsible for hiring staff and submitting state reports. Cafeteria managers oversee daily meal production, maintain production records, manage kitchen inventory, and train new staff. Cafeteria specialists are responsible for preparing and serving meals, and receiving, organizing, and storing groceries. The warehouse manager monitors bid pricing and procurement and oversees the food service inventory. The warehouse clerk

coordinates with cafeteria managers and processes weekly grocery requisitions; manages the receiving process for all orders delivered to the warehouse; and reconciles receipts from deliveries with invoices and submits statements to accounts payable for payment. The food service driver delivers food from the warehouse to the campus kitchens, and transports food between cooking kitchens and satellite kitchens. The district food service secretary reviews and submits food service staff time sheets to payroll, answers telephone contacts, and assists the food service director in the hiring process. The secretary also enters data into the monthly CNP claims report, submits kitchen work orders to the Maintenance Department, and enters requisitions for the Food Service Department.

The district uses Systems Design, which is a school nutrition-management software that assists districts to plan menus and count and claim reimbursable meals.

DETAILED ACCOMPLISHMENTS

FOOD SERVICE OPERATIONS MANUAL

The Kingsville ISD Food Service Department maintains a food service operations manual that standardizes kitchen procedures throughout the district. The food service director recognized the need for a written procedures manual for staff and developed the manual during calendar year 2016. All newly hired staff receive a copy of the manual, and each kitchen keeps a copy of the manual onsite. The manual includes the district's mission and vision statements, and the district's child nutrition mission statement. The written procedures cover key topics of operations and federal, state, and local regulations, including: CNP nutrition meal pattern requirements; serving line procedures; food receiving and storage procedures; food sanitation, safety, and handling procedures; kitchen safety rules; cleaning and sanitation procedures; point-of-service procedures; training requirements; and payroll, leave, and overtime procedures.

The department's comprehensive operations manual serves as a resource to staff and documents an internal control structure that supports the accuracy of financial reports, helps to prevent fraud, protects the district's resources, and helps ensure that the district complies with state and federal laws and regulations.

TRAINING AND EVALUATION

The Kingsville ISD Food Service Department has established effective processes for training and evaluating department staff. New food service staff receive an orientation that includes an introduction to the department's mission, requirements, and goals. Staff then are trained at each station in the kitchen to ensure that all staff are cross-trained in all kitchen tasks. The food service director meets with department staff monthly to provide ongoing training on topics such as program updates, customer service skills, and culinary skills. The department also holds an annual training to address topics such as civil rights, hazard analysis and critical control points, the NSLP provision Offer versus Serve, and food safety. During the summer, cafeteria managers attend mandatory summer training conferences. Cafeteria specialists also may attend these conferences, and the district covers the training costs.

In addition to a robust training program, the Food Service Department conducts regular evaluations of food service staff. All Food Service Department staff receive a formal annual evaluation in writing from their supervisors. Cafeteria managers perform weekly written evaluations of cafeteria specialists using an assessment instrument to rate staff in areas of food production, safety and sanitation, record keeping, and dependability. Staff reported that the weekly assessments help managers identify and address opportunities for improvement before small issues develop into significant problems.

DETAILED FINDINGS

STAFFING (REC. 32)

Kingsville ISD lacks processes to evaluate and manage staffing levels in the Food Service Department.

Since school year 2009–10, student enrollment in Kingsville ISD has decreased steadily from 3,981 students to 2,805 students, an overall decrease of 29.5 percent. During this period, the district closed three campuses. The most recent school closures were two campuses that ceased operations during school year 2020–21, and all food service staff from the closed campuses were reassigned among the remaining campuses. The decreased enrollment, coupled with the effects of remote learning during the onset of the COVID-19 pandemic, have contributed to decreased student participation in school meals. Despite these changes resulting in fewer meals served, the district has not performed an analysis to determine if current staffing levels are sufficient relative to the number of meals the kitchens produce.

According to staff interviews, the food service director is responsible for assigning staff to each of the district's five kitchens. Staff reported that the number of cafeteria

specialists per kitchen is based on enrollment. Staff said that the director assigns one specialist per 100 students for each campus. **Figure 8–2** shows the enrollment and number of food service staff for each campus.

As shown in **Figure 8–2**, the number of cafeteria specialists assigned to each campus exceeds the department's staffing formula for three out of five campuses and underserves one campus, according to the formula. This discrepancy could be the result of staff reassignments following campus closures. However, the district's enrollment-based staffing formula is limited and not useful for evaluating staffing efficiency because it does not account for meal participation, which directly affects the number of meals served. Kingsville ISD has recorded lower meal participation in breakfast and lunch since school year 2020–21; however current staffing does not represent any adjustments based on these changes.

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

Best practices promoted by the School Nutrition Association (SNA), a national organization of school nutrition professionals, recommend that the MPLH at a campus should be from 14.0 to 18.0 meals. According to the 2018 SNA publication *Case Study: Benchmarking Meals per Labor Hour (MPLH)*, a district cafeteria with an MPLH rate of less than 14.0 should consider adjusting its labor hours. At the review team's request, Kingsville ISD provided MPLH calculations for each of its kitchens ranging from 4.1 meals to 9.7 meals. If these calculations are accurate, labor productivity is far below industry standards at all campuses, indicating potential overstaffing.

The district also has not evaluated the efficiency of warehouse organization and staffing, which reportedly has remained the same for the past 10 years throughout enrollment changes and campus closures. District staff reported that maintaining the warehouse is necessary because campus kitchens do not have storage space to receive and store all food and supplies. District staff said that the district is unable to renovate or initiate new construction projects due to existing bond debt; therefore, expanding the supply capacity of the kitchens is not feasible. However, the district could streamline warehouse

FIGURE 8–2
KINGSVILLE ISD ENROLLMENT AND FOOD SERVICE STAFF BY CAMPUS
SCHOOL YEAR 2021–22

CAMPUS	ENROLLMENT	CAFETERIA SPECIALISTS
Gillett Middle School	604	8
Harrel Elementary School	323	3
Harvey Elementary School	509	6
King Early College High School	915	11
Perez Elementary School	454	3

SOURCES: Kingsville ISD Website, March 2022; Texas Education Agency, Public Education Information Management System, Student Enrollment Report, school year 2021–22.

duties. The warehouse staff includes a manager, a clerk, and a driver dedicated to food service. The manager's duties primarily include contract management for food and supplies, which typically are the responsibility of a food service director. The warehouse clerk places the weekly grocery orders with vendors for some campuses; however, other campuses place their own orders. The warehouse clerk conducts the receiving process for some food deliveries, and some campus cafeteria managers also perform these duties. District leadership has not analyzed warehouse operations to identify duplication of duties among warehouse and kitchen staff for efficiency and effectiveness.

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

In a 2019 publication, *How to Calculate and Establish Meals per Labor Hour*, SNA notes that calculation of MPLH is important because it provides the following benefits:

- measures the financial success of the school nutrition program;

- monitors the labor efficiency of operations;

- determines appropriate staffing levels;

- guides the labor budget; and

- stimulates operational changes.

Kingsville ISD should evaluate the efficiency of Food Service Department staffing in the kitchens and in the warehouse.

The food service director should determine a regular schedule for calculating MPLH at each campus and compare calculations to data from past months and years. After the district has established a process for regular accounting of MPLH, the food service director should assess whether staffing levels should be adjusted. The director should set MPLH targets for each campus and align staffing hours to achieve those goals. This adjustment could occur through attrition, enabling the director to adjust hours as vacancies occur.

As part of this process, the food service director should coordinate with cafeteria managers to determine the hours that best support each cafeteria's needs. Effective districts often schedule the cafeteria manager and a lead staff as full-time, while other positions could be part-time and work during the busiest hours. The food service director should evaluate this option to support cafeteria staff appropriately.

The food service director and the human resources director should review warehouse staffing levels to ensure that all functions are staffed appropriately with the goal of emulating industry best practices and streamlining duplicated duties. The food service director also should evaluate current workflows in the warehouse and kitchens regarding procurement, food ordering, and inventory management to determine whether staff could be repurposed or if processes could be reengineered to maximize operational efficiencies and effectiveness.

A fiscal impact cannot be assumed until the food service director determines the appropriate staffing levels for department staff. The Food Service Department could record savings by implementing regular MPLH assessments and maintaining best practices.

DISTRICT OVERSIGHT (REC. 33)

Kingsville ISD has not established expectations and measures for food service program performance.

District leadership does not use performance measures and benchmarks to monitor and evaluate the efficiency and effectiveness of the district's Food Service Department. The lack of standards limits the district's ability to oversee department operational performance effectively and identify problem areas to make informed management decisions.

Although the food service director reports to the superintendent, they do not meet regularly. The superintendent reportedly reviews Food Service Department financial performance quarterly with a primary concern that the department is not losing money. Kingsville ISD has faced challenges recently related to student performance, decreased enrollment, lower attendance, and budget deficits. The superintendent reported that these issues are the primary focus, and that, because the district's CNP is financially stable, the superintendent does not monitor other indicators of food service operational efficiency beyond quarterly profit-and-loss statements. Although profit-and-loss statements provide information regarding the financial health of food service operations, they do not fully show an operation's level of efficiency. **Figure 8–3** shows key performance indicators (KPI) that district administrators can use to assess overall food service operations.

According to staff interviews, the food service director tracks some of these KPIs for each campus and adjusts operations accordingly; however, the director does not have opportunities to report food service department performance to district administration. The food service director is not a part of the district leadership team and has not been invited to attend a leadership team meeting to provide updates on the CNP. Without opportunities to meet with district administration, the food service director is not able to present key information to district leadership such as program challenges where assistance is needed in areas outside of the director's authority.

Meal participation is one example of an area of program operations that could be improved by greater district-level oversight and support. Meal participation is the total number of meals served divided by the total average daily attendance. **Figure 8–4** shows Kingsville ISD's breakfast and lunch participation rates from school years 2017–18 to 2021–22. Participation in both programs has decreased since school year 2018–19.

For school year 2020–21, meal participation rates decreased significantly due to virtual learning. Although participation rates increased during school year 2021–22, rates had not been restored to pre-pandemic levels as of December 2021. The review team observed several factors that may contribute to lower meal participation, including the presence of outside food in cafeterias during mealtimes, vending machines being accessible to students during mealtimes, and meal scheduling issues that result in some students eating lunch in their classrooms rather than in the cafeteria with other students. Some of these issues potentially are noncompliant with state and federal program regulations. Additionally, these issues do not maximize student participation in the district's meal programs. They also are examples of challenges that are outside of the Food Service Department's ability to resolve

FIGURE 8–3
KEY PERFORMANCE INDICATORS FOR FOOD SERVICE OPERATIONS
SCHOOL YEAR 2022–23

INDICATOR	CALCULATION	IMPORTANCE OF INDICATOR
Labor cost as percentage of total revenue	Total labor costs divided by total revenue	Labor costs are the largest expenditure that food service departments incur. Total labor cost ratios provide administrators with information regarding how much total program revenue is dedicated to compensating staff. Effective districts maintain labor costs of less than 45.0 percent of revenue.
Food cost as a percentage of total revenue	Total food costs divided by total revenue	Food cost, including the value of U.S. Department of Agriculture USDA Foods in Schools Programs distributions, should be kept at 40.0 percent or less, especially when labor cost is high. Food costs are affected by menu selections, purchasing practices, accurate forecasting, and control of waste.
Breakfast Participation Rates	Total number of breakfasts served divided by the total average daily attendance	Participation rates directly affect program revenues. Studies show a positive correlation between breakfast consumption and students' school attendance, alertness, health, behavior, and academic success. Factors that influence participation rates include menu selections, attractiveness of dining areas, open campuses, competitive food sales, and adequate time to eat.
Lunch Participation Rates	Total number of lunches served divided by the total average daily attendance	High participation rates indicate customer satisfaction and maximize program reimbursements. Factors that influence participation rates include menu selections, attractiveness of dining areas, open campuses, competitive food sales, and adequate time to eat.
Inventory on hand	Value of the ending inventory divided by the average daily food cost	Avoiding excess inventory helps reduce food theft and spoilage and decreases food costs. Optimal inventory targets are affected by the frequency of food and supply deliveries. For sites that receive weekly deliveries, schools should maintain no more than seven days of inventory on hand.
Meals per Labor Hour	Total number of meal equivalents for a period divided by the total number of paid labor hours for the same period	Most programs should maintain a minimum target of 18.0 meals per labor hour.

SOURCES: Legislative Budget Board School Performance Review Team, March 2022; Julie Boettger, "Rx for a Healthy School Nutrition Program," *School Business Affairs,* Association of School Business Officials International, December 2009; Institute of Child Nutrition, *Inventory Management and Tracking Reference Guide,* 2012; Council of the Great City Schools, *Managing for Results in America's Great City Schools*, October 2021.

FIGURE 8–4
KINGSVILLE ISD BREAKFAST AND LUNCH AVERAGE DAILY PARTICIPATION RATES
SCHOOL YEARS 2017–18 TO 2021–2022 (1)

MEAL	2017–18	2018–19	2019–20	2020–21	2021–22 (1)
Lunch	83.3%	85.7%	81.4%	29.9%	65.2%
Breakfast	85.0%	87.7%	83.8%	29.3%	51.3%

NOTE: (1): School year 2021–22 participation shows rates from September 2021 to December 2021. These rates are estimated based on Kingsville ISD's 2020–21 average daily attendance.
SOURCE: Texas Department of Agriculture, Texas Unified Nutrition Program System.

without cooperation and assistance from principals and district administration.

The lack of oversight of KPIs and the exclusion of the food service director from district leadership meetings prevents district administration from identifying barriers to optimal program performance, such as meal period schedules, bus arrival times, financial report timeliness, and staff recruitment issues. Districts can enhance food service operations through attention and adjustment to these areas. In addition, in the event of a public health emergency, including input from

food service management is key to effective response planning efforts, as reported in the Legislative Budget Board publication, *School Performance Review: Food Service Operations*, 2021.

An effective performance-measurement system enables managers to monitor regularly how food service program performance and costs compare to established benchmark standards. Effective operations also report findings to the superintendent and school board and identify the need to take corrective actions to address problems such as excessive

program costs, low staff productivity, or low student participation and satisfaction.

Kingsville ISD should establish a performance-measurement system that enables district leadership to evaluate the food service program and make informed decisions for the use of limited resources.

The superintendent should collaborate with the food service director to develop a set of performance measures and a schedule for the food service director to provide district leadership and the board regularly with a report summarizing program information. The superintendent should invite the food service director periodically to present an overview of program accomplishments, shortfalls, recommendations, and issues where assistance is needed to district-level management and the board. This presentation will showcase program efforts and help district leadership identify areas where the Food Service Department needs additional support from administration.

The district could implement this recommendation with existing resources.

STAKEHOLDER COMMUNICATION (REC. 34)

Kingsville ISD does not communicate effectively with food service stakeholders.

At the time of the onsite visit, the Food Service Department's communication with parents and students occurred primarily through the district's website, which contains limited information about food services. The website does not show the district's wellness policy with nutrition standards, identify food service special events, or promote the CNP. None of the six campus webpages mention food service, contain links to the Food Service Department page, or contain posted menus. Although staff described special events hosted by the department, such as an annual burger bash, the district's website shows no promotional information for food service events.

The district maintains a social media account to which it routinely posts information about district events and recognizes achievements by students and district staff. A review of this account found no mention of Food Service Department programs, events, or recognition of Food Service Department staff.

In addition to opportunities to improve external communications, the district's Food Service Department lacks processes to solicit feedback from its customers.

Department management gauges student preferences by monitoring participation and adjusting menus based on the popularity of items with students. Although the district uses this best practice, it could enhance its communications with students through mechanisms such as regular customer surveys, individual cafeteria evaluations, suggestion boxes, and customer taste tests.

The lack of processes to promote the district's food service operations and acquire customer feedback may contribute to a negative perception of school food among students and the community, in turn decreasing meal participation rates. In the review team's survey of parents, 59.4 percent of respondents indicated disagreement with the statement "cafeteria food looks and tastes good." Department staff described incidents wherein students digitally altered photographs of cafeteria food to appear unappealing and shared these images on social media. The food service director reportedly has met with concerned parents and faculty to dispel rumors of foodborne illness caused by cafeteria food and to provide reassurance that cafeteria food is nutritious and safe to eat. These public relations challenges for the department underscore the need for improved communication with students, parents, and the community.

Alice ISD, a peer district of Kingsville ISD, maintains a food service webpage that promotes the Food Service Department and communicates key information to stakeholders. Available on the website are school menus, catering forms, a food service survey, the district's wellness policy, and resources for food assistance for families. The department also publishes a school nutrition newsletter that promotes special events and spotlights staff as part of its employee recognition program.

Social media is a highly effective tool for growing public awareness and engagement in a food service program. Platforms such as Facebook, Instagram, and Twitter enable district food service departments to stay connected to multiple stakeholders and audiences consistently. The program can use well-trafficked platforms to share updates and highlights with families, faculty, staff, administrators, and partners. Regular communication can improve trust, strengthen partnerships, and even increase participation for the program.

The SNA, in its 2019 publication *Keys to Excellence*, describes the following communications best practices for school food service communications:

- a marketing plan is developed and implemented using established marketing principles and techniques;

- a public relations program is intended to promote and maintain a positive public image for the school nutrition program;

- the school nutrition program communicates the importance of the program to stakeholders in the school district; and

- the school nutrition program coordinates the use of multiple approaches to provide information to stakeholders within the school district and in the community.

Some of the activities to support these best practices include:

- the nutritional and economic advantages of school meals are promoted to stakeholders using several communications methods;

- the school nutrition program collaborates with the district's public information officer or other spokesperson to provide content and develop press releases, other written communications, and social media promotions about the school nutrition program;

- the district develops a plan of action to address unexpected attention regarding school meals such as food recalls or negative media reports;

- the school nutrition program contacts stakeholders such as teachers, principals, parents, and district staff for support and assistance in promoting the benefits of the school nutrition program;

- the school nutrition program organizes opportunities such as food shows, tasting panels, and focus groups to engage students in program planning and to educate them on the role of good nutrition and healthy lifestyles;

- school nutrition staff communicate to the school community the important direct link between good nutrition and students' educational performance, providing current scientific studies and research;

- school nutrition staff are trained to use social media appropriately for program promotion, or the program engages experts to develop social media promotions; and

- information and messages are translated into the most prominent language(s) spoken by the student population.

Kingsville ISD should promote and support the Food Service Department by enhancing communication with students, staff, and the community and solicit customer feedback to identify needed improvements.

The food service director should collaborate with the Technology Department to enhance the information provided on the Food Service Department webpage, including the following items:

- a school nutrition program brochure or newsletter that highlights the benefits of school meals, cafeteria events, upcoming improvements, and new menu items;

- menu calendars that include nutritional information and may use vibrant graphics or student artwork, highlight local farmer partners, and market featured menu items;

- nutrition education information that visually reinforces healthy food messaging; and

- spotlights on individual food service staff to recognize their hard work and contribution to preparing and serving healthy meals to students.

The Technology Department also should add links for each campus webpage to menu calendars.

Additionally, the foods service director should collaborate with the Technology Department to report program information on the district's social media accounts, including the following highlights:

- upcoming menu items that include local or seasonal ingredients to generate excitement for the program;

- scheduled lunchroom education activities;

- testimonials and anecdotes from students, staff, and school food professionals about their experience with school food;

- program statistics to reinforce support for the program's mission and vision;

- partnerships with small and local businesses that support the food service program; and

- the latest policy changes and news related to school food.

The food service director also should develop tools to solicit feedback periodically from stakeholders. These methods can

include establishing student focus groups and administering surveys regularly.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATION

During the onsite visit, the review team observed an additional issue regarding the district's programs and services to students, staff, and the community. This observation is presented for consideration as the district implements the report's other findings and recommendations.

Districts can reduce food costs by effectively using USDA commodities. Through this program, districts receive a commodity allocation, or credit, that enables them to select food items at no cost that they otherwise would have to purchase. Available commodity food items typically include meat, fish, poultry, fruits, cheese, oil, and grains. Districts often can obtain savings by modifying their school menus to match their food suppliers' stock inventory of USDA foods.

Kingsville ISD's total school year 2020–21 USDA Foods entitlement was $181,785, and at the end of the year $54,195 of that entitlement was unused. According to the district, supply-chain issues hindered manufacturers from supplying some products. However, Kingsville ISD had the highest amount of unused entitlement compared to peer districts, which demonstrates a significant opportunity for improvement in controlling food costs.

FISCAL IMPACT

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

9. TRANSPORTATION MANAGEMENT

ACCOMPLISHMENTS

♦ Kingsville ISD's Transportation Department developed a comprehensive training manual for drivers and staff with detailed guidance and safety procedures.

♦ Kingsville ISD's Transportation Department has reduced repair costs by performing a majority of ongoing repairs and maintenance with department staff.

♦ Kingsville ISD's Transportation Department leadership and staff developed a productive communication and working relationship with campus principals, coaches, and staff to meet the transportation needs of the district within limited capacity.

FINDINGS

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

♦ Kingsville ISD lacks a comprehensive vehicle replacement plan.

♦ Kingsville ISD bus lanes are not separated from parent pickup and drop-off lanes at some campuses.

♦ Kingsville ISD has not developed an appropriate behavior-management plan to ensure safe transportation of students.

RECOMMENDATIONS

♦ **Recommendation 35: Develop performance metrics to measure the effectiveness and efficiency of the Transportation Department.**

♦ **Recommendation 36: Develop a vehicle replacement plan that includes industry-standard criteria.**

♦ **Recommendation 37: Form a transportation safety committee to examine the separation of bus lanes on campuses to implement safer, more effective pickup and drop-off practices.**

♦ **Recommendation 38: Develop and implement behavior-management procedures for student transportation services.**

BACKGROUND

An independent school district's transportation function transports students to and from school and other school-related activities. This function is regulated by federal and Texas state laws related to funding, vehicle type, driver education, and safety issues. Districts implement these regulations, budget and allocate resources, and establish operational procedures for bell schedules, bus routes, and transportation fleet maintenance.

Managing transportation operations is dependent on the organization of the district. Districts may either contract for or self-manage their transportation operations. Using a contracted management model, districts rely on the company to provide supervision of its transportation operation. In this arrangement, a district may rely on the company to provide all or some staff, or may use district staff for its operations. Using the self-management model, a district manages transportation functions without assistance from an outside entity.

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

Kingsville Independent School District's (ISD) Transportation Department uses the self-management model and maps and serves the bus routes that transport students to and from school each day. The department also coordinates transportation for athletics and extracurricular trips.

The district maintains a fleet of 19 school buses that serve 63 bus routes, which include 34 regular education routes and 29 special-services routes. During school year 2020–

21, the district reported transporting an average of 400 students daily out of 2,850 enrolled, or 14.0 percent.

Kingsville ISD's Transportation Department is overseen by the transportation foreman, who reports to the chief financial officer (CFO). **Figure 9–1** shows the school year 2021–22 organization of Kingsville ISD's Transportation Department. The district has 13 bus drivers and one substitute driver. The department also includes five bus aides who assist on the special-services routes, two clerks who assist with clerical and administrative duties, and two mechanics. All transportation staff are officed at the fleet maintenance facility. The fleet maintenance facility is located approximately one mile from the district administration building on a lot owned by the district. The district's buses and white fleet vehicles are stored at the fleet maintenance facility. Transportation staff perform repair and maintenance of all district-owned vehicles at the facility and perform general maintenance, such as oil and tire changes. The fleet maintenance facility includes a fuel point that dispenses diesel fuel and unleaded gasoline.

Figure 9–2 shows the district's student ridership during the past three school years. The average daily ridership decreased from school years 2018–19 to 2020–21 by 671 students. The lower ridership numbers correspond with the onset of the COVID-19 pandemic, when many students received remote instruction during school year 2020–21.

Figure 9–2 also shows the linear density and the total annual state funding for transportation. Linear density is the ratio of the average number of regular education students transported daily to the number of miles traveled daily for those students. From school years 2018–19 to 2020–21, total annual state funding decreased by $86,225. The decrease in annual funding primarily corresponds to decreased average daily ridership and total annual mileage reported to the TEA during the period due to remote learning.

FIGURE 9–1
KINGSVILLE ISD TRANSPORTATION DEPARTMENT ORGANIZATION
SCHOOL YEAR 2021–22
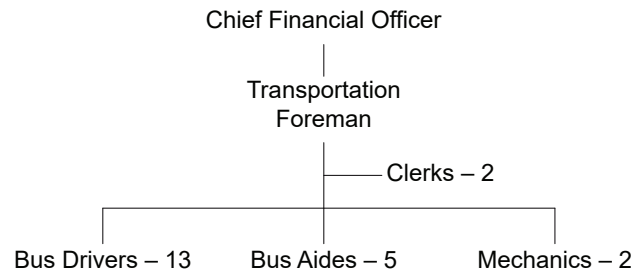
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

DETAILED ACCOMPLISHMENTS

TRANSPORTATION MANUAL

Kingsville ISD's Transportation Department developed a comprehensive training manual for drivers and staff with detailed guidance and safety procedures. The Transportation Department Driver Handbook was developed to promote the "highest degree of professionalism, safety, and efficiency" in the department and provides detailed guidance related to safety and emergency procedures, vehicle inspections, reporting requirements, driver and aide responsibilities, first aid, and other departmental processes. The handbook is distributed to Transportation Department staff at the beginning of every school year, and the transportation foreman reviews the manual with all staff to promote a high level of operational efficiency and a culture of safety within the department. By developing a comprehensive manual detailing specific processes and procedures, the Transportation Department provides staff with a detailed resource if questions arise regarding staff's responsibilities, safety, and administrative requirements.

FIGURE 9–2
KINGSVILLE ISD'S TRANSPORTATION ROUTING AND STATE FUNDING
SCHOOL YEARS 2018–19 TO 2020–21

CATEGORY	2018–19	2019–20	2020–21
Average daily ridership – Regular program/Hazardous area service	1,071	1,060	400
Average daily ridership – Special program	84	101	56
Average daily ridership – Total students	1,155	1,161	456
Linear density	1.23	1.36	4.16
Total annual state funding	**$163,561**	**$74,145**	**$54,550**

SOURCE: Texas Education Agency, Kingsville ISD School Transportation Route Services Report, school years 2018–19 to 2020–21.

FIGURE 9–3
KINGSVILLE ISD TRANSPORTATION DEPARTMENT EXPENDITURES
SCHOOL YEARS 2018–19 TO 2020–21

CATEGORIES	2018–19	2019–20	2020–21	PERCENTAGE CHANGE
Total Costs	**$862,910**	**$809,477**	**$644,794**	**(25.3%)**
Salaries and Benefits	$476,380	$520,834	$500,611	5.1%
Purchases	$104,862	$116,152	$38,364	(63.4%)
Supplies and Materials	$164,550	$165,145	$103,708	(37.0%)
Depreciation/Other Operating Expense	$117,118	$7,346	$2,111	(98.2%)
Cost per Mile, Regular Program	$2.52	$10.77	$7.17	184.5%
Cost per Mile, Special-services Program	$2.92	$5.80	$10.34	254.1%

SOURCE: Texas Education Agency, Student Transportation Operations reports for Kingsville ISD, school years 2018–19 to 2020–21.

VEHICLE REPAIRS AND MAINTENANCE

Kingsville ISD's Transportation Department has reduced repair costs by performing a majority of ongoing repairs and maintenance with department staff. Before calendar year 2019, the district contracted out most vehicle repairs and maintenance to local mechanics and repair shops. In 2019, the Transportation Department hired a full-time mechanic and mechanic's helper to conduct the majority of maintenance and repairs for the district. This staffing has assisted the department to reduce costs for vehicle repairs significantly and has enabled the district to keep all buses operational to meet the transportation needs of the district.

CAMPUS COMMUNICATION AND COORDINATION

Kingsville ISD's Transportation Department leadership and staff developed a productive communication and working relationship with campus principals, coaches, and staff to meet the transportation needs of the district within limited capacity. During interviews, many staff reported that the Transportation Department provides a high level of service across the district and meets various transportation needs, often with limited notice. Transportation Department staff have developed a culture of communication and coordination with campus leadership to provide this service to the district's students and staff.

DETAILED FINDINGS

PERFORMANCE METRICS (REC. 35)

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

Before the Kingsville ISD Transportation Department transports students from home to school, drivers and aides conduct pre-trip inspections and depart for the morning bus run. The bus drivers must execute an effective route design to bring students to school on time for the bell schedules. In the afternoon, the bus drivers report to transport students home.

Principals and coaches reported that the Transportation Department coordinates daily student transportation effectively at the campuses and for after-school student activities. However, the transportation foreman said that the department does not track any performance metrics systematically to assess overall efficiency. The district does not compare its performance against established benchmarks, key performance indicators (KPI), or peer districts to identify areas of improvement. KPIs track progress toward achieving the organization's objectives by monitoring activities that could cause losses or failure.

Figure 9–3 shows Kingsville ISD's transportation expenditures. Since school year 2018–19, the total cost of transportation has decreased by 25.3 percent, but the decrease has not been uniform among categories. Salaries and benefits costs have increased by 5.1 percent, purchases have decreased 63.4 percent, and supplies and materials costs have decreased by 37.0 percent. During the same period, the cost per mile of the regular transportation program increased by 184.5 percent, and the cost per mile for special services increased by 254.1 percent.

A key indicator of a transportation operation's efficiency is a comparison of the operation's fleet and costs against similar-sized operations. **Figure 9–4** shows the operations cost, number of buses, ridership, and cost per regular program and special-services program per mile for Kingsville ISD and its peer districts during school year 2020–21. Peer districts are school districts similar in size

FIGURE 9–4
KINGSVILLE ISD AND PEER DISTRICTS' OPERATIONS COMPARISON, SCHOOL YEAR 2020–21

DISTRICT	OPERATIONS COST	BUSES	RIDERS	COST PER REGULAR PROGRAM MILE	COST PER SPECIAL-SERVICES PROGRAM MILE
Kingsville ISD	**$644,794**	**19**	**456**	**$7.17**	**$10.34**
Alice ISD	$902,140	38	140	$5.28	$3.59
Robstown ISD	$374,721	10	374	$1.43	$2.86
West Oso ISD	$407,933	16	265	$5.86	$7.10

SOURCES: Texas Education Agency, Transportation Operations Report and Route Services Report, school year 2020–21; Kingsville ISD, March 2022.

and other characteristics to Kingsville ISD that are used for comparison purposes. The peer districts for Kingsville ISD are Alice ISD, Robstown ISD, and West Oso ISD. For school year 2020–21, Kingsville ISD had higher operations costs than two peer districts and higher mile costs for regular programs and special-services programs than all three of the peer districts.

Kingsville ISD's percentage change increase in the cost-per-mile ratios in **Figure 9–3** and the high cost-per-mile totals compared to peers shown in **Figure 9–4** is attributed primarily to students receiving remote instruction during school year 2020–21. However, without a process to track performance metrics, the district is unable to identify inefficient operations and opportunities to lower costs.

Effective districts use performance-measurement systems to identify measurable goals and objectives. The process of continual improvement requires the use of benchmarks. Districts establish a desired goal or benchmark for each measurement, document its data, and compare the data to the benchmarks. Establishing performance metrics for transportation operations enables a district to make data-driven decisions supported by objective evidence. Districts can determine how the department is functioning monthly or quarterly.

Figure 9–5 shows an example of transportation benchmarks used in other districts or noted in transportation research.

Kingsville ISD should develop performance metrics to measure the effectiveness and efficiency of the Transportation Department.

The transportation foreman should include goals with clear objectives and dates to accomplish critical tasks. The transportation foreman should develop the initial set of performance metrics, then communicate them to all stakeholders.

FIGURE 9–5
TRANSPORTATION INDUSTRY BENCHMARKS

BENCHMARK	MEASURE
Preventable Accidents	1:100,000 miles
On-time Performance	99.5% (includes all services)
Routing Utilization Efficiency	80.0% of available time or available capacity
Runs per Bus (morning)	1.6 to 1.9 (double-tiered system)
	2.3 to 2.5 (triple-tiered system)
Bus-to-Mechanic Ratio	25:1 to 30:1 (depends on bus types and age)
Spare Bus Ratio	10.0% to 15.0% (depends on bus types and trip volume)
Driver Turnover Rate	<15.0%
Parts Cost per Mile (no labor)	$0.16 to $0.18 (depends on bus types and age)
Maintenance Cost per Mile	$0.39 to $0.43 (depends on bus types and age, assumes 13,000 miles per bus per year)
Fleet Miles per Gallon	6.0 to 7.0 gallons (depends on bus types and age)
Driver Labor Percentage of Operating Costs	39.0% to 43.0% (benefits and workers' compensation excluded)
Total Labor Percentage of Operating Costs	54.0% to 61.0% (benefits and workers' compensation excluded)
Insurance and Risk Percentage of Cost	5.0% to 10.0% (excluding workers' compensation)
Annual Cost per Bus Operated	$30,000 to $50,000 per bus (excluding capital cost)
Fleet Useful Life	10,000 miles to 15,000 miles per year; 180,000 miles maximum
Bus Replacement Policy	10.0 years to 12.0 years; spares, 11.0 years to 13.0 years

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

Figure 9–6 shows critical areas the district should consider when developing a tracking system for performance metrics.

The transportation foreman should compare actual performance against the selected benchmarks to determine where improvements are needed. The transportation foreman regularly should report performance information, including goals and areas for improvement, to the CFO and superintendent.

The district could implement this recommendation with existing resources.

BUS REPLACEMENT PLAN (REC. 36)

Kingsville ISD lacks a comprehensive vehicle replacement plan.

The district owns 13 fleet buses and six special education buses. The district also owns 29 white fleet vehicles, which are vehicles other than school buses, and this fleet includes primarily trucks, vans, and sport utility vehicles. According to the transportation foreman, the district has not purchased a vehicle from school years 2019–20 to 2021–22, and the district has no timeline for purchasing fleet vehicles. Before the foreman led the department, the previous transportation foreman acquired quotes from several vendors and submitted the purchase requests to the Board of Trustees for approval. However, the district lacks a formal fleet-replacement plan and has not established long-term funding methods for bus purchases.

As a result, decisions regarding when to replace buses is ad hoc and do not consider industry replacement criteria commonly used as a best practice in self-managed transportation departments. The bus fleet has an average age of 14.3 years, ranging from 4.0 years to 30.0 years. **Figure 9–7** shows the district's bus inventory of 19 buses, showing that the district has owned 11 buses for 16.0 years or more. Kingsville ISD's buses were purchased from multiple major school bus manufacturers, including Bluebird, Chevrolet, International, and Thomas.

The district used 18 buses in the daily routes for school year 2021–22, and the oldest bus, a 1992 Bluebird bus, served as a spare bus. According to interviews, the transportation foreman and lead mechanic regularly assess the conditions of the buses and schedule repairs and ongoing maintenance as necessary. By performing regular maintenance, the Transportation Department has kept its bus fleet operational. However, older buses will require service levels and increased costs that become prohibitive to maintain.

FIGURE 9–6
KINGSVILLE ISD CRITICAL TRANSPORTATION MEASUREMENT, MARCH 2022

BENCHMARK	MEASURE
Cost Efficiency	• Cost per Mile • Cost per Student • Cost per Bus
Cost-effectiveness	• On-time Performance • Spare Bus Ratio • Driver Absentee Rate • Average Student Occupancy Rate
Safety	• Accidents per 100,000 Miles • Student Behavior Incidents per Month

Source: Legislative Budget Board School Performance Review Team.

FIGURE 9–7
KINGSVILLE ISD BUS INVENTORY BY MODEL YEAR SCHOOL YEAR 2021–22

MODEL YEAR	BUS AGE (IN YEARS)	MAKE	QUANTITY
2018	4	International	2
2014	8	Thomas	5
2012	10	International	1
2006	16	International	3
2004	18	International	4
2002	20	Chevrolet	2
1999	23	Chevrolet	1
1992	30	Bluebird	1
Total			**19**

Sources: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

The district's white fleet vehicles also are aging, and many require replacement. **Figure 9–8** shows the model year, age, and type of vehicle that make up the district's white fleet inventory. The average age of white fleet vehicles in the district is 14.9 years.

The National Association of State Directors of Pupil Transportation Services recommends that buses are replaced every 8.0 years to 15.0 years, depending on the type of bus and level of use. Buses older than 16.0 years often are not compliant with current regulations and policies. An aging fleet with significant mileage typically costs more to operate because it provides lower miles per gallon in fuel consumption and requires more frequent repairs and higher repair costs. Using this standard, 11 of Kingsville ISD's 19

buses are more than 15.0 years old and require replacement. Two district buses are newer than the replacement range of 8.0-years to 15.0 years.

Without a defined and supported replacement plan, the average and maximum ages of a district's fleet of vehicles is likely to increase. Although principals and staff reported in interviews a high level of satisfaction with the service provided by the Transportation Department, maintaining an acceptable level of service will become increasingly difficult to achieve as buses age. Additionally, the district fleet's operation will require increased costs due to the higher maintenance costs for older buses.

Regular investment in bus fleet replacement is important to ensure the ongoing safety, reliability, and efficiency of the Transportation Department. Older vehicles are less reliable, leading to an increase in breakdowns and service disruptions, and require the department to retain a higher proportion of spare vehicles in the fleet to cover more frequent and longer maintenance and repair activities. Older vehicles also lack improvements in vehicle technology for safety and efficiency.

According to the Council of the Great City Schools, an efficient transportation department has a goal to procure only the number of buses needed daily, plus an appropriate spare-bus ratio of 10.0 percent to 15.0 percent of the fleet. Although this standard is discretionary based on the district's needs, the district's size, off-site parking availability, age of the fleet, and reliability of the fleet are all factors that can affect the appropriate spare ratio for a fleet.

Kingsville ISD's Transportation Department should develop a vehicle replacement plan that includes industry-standard criteria.

One method of assessing optimal replacement criteria considers vehicle life-cycle costs as a function of increasing maintenance costs and decreasing capital-depreciation costs, or year-over-year change in residual value and accumulated maintenance costs. The point at which the cost of maintenance (annual maintenance costs) exceeds the cost of ownership (annual capital-depreciation costs) represents the recommended replacement age. Continued maintenance and use of fleet vehicles and equipment past this optimum point increases cumulative life-cycle costs.

The transportation foreman should develop business-case justifications for a robust vehicle replacement strategy that incorporates processes to ensure the district acquires sufficient vehicles to meet its needs.

FIGURE 9–8
KINGSVILLE ISD WHITE FLEET INVENTORY BY MODEL YEAR SCHOOL YEAR 2021–22

YEAR	VEHICLE AGE (IN YEARS)	MAKE	QUANTITY
2019	3	Ford van	1
2018	4	Chevrolet pickup	1
2018	4	Chevrolet SUV	1
2016	6	Ford SUV	1
2015	7	Ford pickup	1
2014	8	Ford SUV	1
2013	9	Ford pickup	1
2012	10	Chevrolet SUV	2
2011	11	Ford pickup	2
2008	14	Ford pickup	2
2008	14	Ford SUV	1
2007	15	Chevrolet pickup	1
2007	15	Ford van	1
2006	16	Chevrolet van	1
2006	16	Ford pickup	1
2005	17	Ford van	1
2003	19	Chevrolet pickup	2
2002	20	Chevrolet van	3
1999	23	Ford pickup	1
1996	26	Dodge pickup	1
1996	26	Dodge van	1
1995	27	GMC pickup	1
1993	29	GMC pickup	1
Total			**29**

NOTES: SUV=sport utility vehicle; GMC=General Motors Truck Company.
SOURCES: Legislative Budget Board School Performance Review Team; Kingsville ISD, March 2022.

In developing the plan, the transportation foreman should include key data such as long-range enrollment forecasting and the percentage of enrolled students transported. The plan should separate replacement criteria based on vehicle capacity and body type into make/model and include the following data:

- vehicle mileage;

- maintenance costs compared to vehicle value;

- per-mile operating cost;

- anticipated annual cost increases of new vehicles;

- per-seat cost for school buses;

- anticipated revenue from the sale of replaced vehicles; and

- anticipated maintenance savings by: (1) removing older vehicles that are more expensive to maintain; and (2) including revenue from potential funding sources such as capital funds, bonds, and others.

The replacement plan should be data-driven and based on objective criteria such as miles, age of the vehicle, and parts used to maintain the serviceability, or a combination of criteria. After developing the vehicle replacement plan, the foreman should submit it to the CFO and superintendent for approval.

Additionally, when a vehicle has met the criteria for replacement, the transportation foreman should ensure that the buses are not identified for additional maintenance. As replacement vehicles are added into the district's inventory, the transportation foreman should identify older vehicles regularly for surplus via auction or http://guide.saferoutesinfo.org/pdf/SRTS-Guide_full.pdfdiscard.

The district could implement this recommendation with existing resources.

SEPARATION OF BUS LANES (REC. 37)

Kingsville ISD bus lanes are not separated from parent pickup and drop-off lanes at some campuses.

The Legislative Budget Board's School Performance Review Team visited the district in March 2022. During the onsite visit, the review team observed that some campuses have not separated bus loading and unloading lanes clearly from areas where parents drop off and pick up students. The travel and operation of buses in the student loading areas often is impeded by other traffic on campus.

For example, at Harrel Elementary School and Perez Elementary School, the parent drop-off and pickup area is next to the area where buses load and unload grades four and five students. These campuses have no lane markers or signage to delineate the separation between the bus and parent drop-off lanes. Gillett Middle School has no dedicated lane for buses, so buses and parents load and unload in the same area. At Harvey Elementary School, the review team observed parents dropping off students in the bus lane nearest to the school entrance, requiring buses to use the lane farther from the entrance to unload students.

Based on interviews with principals and Transportation Department staff, the district promotes an ongoing culture of safety and providing safety-related training to bus drivers and campus staff. The transportation foreman holds monthly training and safety meetings so that department staff are updated regarding safety-related requirements and procedures. The use by other drivers of bus loading areas increases the potential for accidents and can risk students' safety.

Safe Routes to School Guide, a publication of the University of North Carolina Safety Research Center in February of 2007, states that school bus loading areas should be separated from parent drop-off and pickup areas to provide order to these loading processes and to minimize the risk of conflicts with nondistrict motor vehicles. One suggestion for districts to alleviate congestion is to employ curb striping, curb painting, and other pavement markings to designate where only buses may park for loading and unloading students at schools. Signs also help define these areas, and signage should be standardized, highly visible, properly installed, and well-maintained. The Texas Department of Public Safety provides recommendations for appropriate signage and placement.

Kingsville ISD should form a transportation safety committee to examine the separation of bus lanes on campuses to implement safer, more effective pickup and drop-off practices.

The committee should consist of parents, the Executive Director of School Improvement, transportation foreman, campus principals, the superintendent, and county transportation officials. All parents, students, and staff should be notified of changes and should receive information regarding the safety concerns requiring the separation of bus lanes from other drivers' drop-off and pickup areas. After the committee determines the areas for bus-only lanes, the district should install appropriate signage as reminders to the community, parents, staff, and students.

The district could implement this recommendation with existing resources.

BEHAVIOR MANAGEMENT (REC. 38)

Kingsville ISD has not developed an appropriate behavior-management plan to ensure safe transportation of students.

In interviews with bus drivers, principals, and campus staff, they reported that student behavior disrupts some bus routes. The district employs bus aides for special-services routes; however, bus drivers are the only staff present for

regular education routes. These drivers have the sole responsibility of ensuring that students arrive safely to and from school campuses. Staff said that when the district closed two campuses and consolidated students at other campus locations before school year 2021–22, some of the bus routes were consolidated; as a result, these routes transport a larger number of students per bus. Drivers and campus staff said that, as routes were consolidated, some buses are running at or near capacity, which increases student behavioral issues.

Kingsville ISD Board Policy FOA (LEGAL), in accordance with the Texas Education Code, Section 37.0022, addresses student discipline and removal of students by school bus drivers. The policy states that "the driver of a school bus transporting students to or from school or a school-sponsored or school-related activity may send a student to the principal's office to maintain effective discipline on the school bus. The principal shall respond by employing appropriate discipline management techniques consistent with the Student Code of Conduct." The Kingsville ISD school year 2021–22 Student Code of Conduct states that when appropriate disciplinary management techniques fail to improve student behavior or when specific misconduct warrants immediate removal, the campus behavior coordinator, which is typically the principal or assistant principal, may restrict or revoke a student's transportation privileges.

When behavioral issues occur on district buses, bus drivers typically provide a discipline report to the campus assistant principal. All buses in the district are equipped with cameras that record video while buses are in operation. If an issue takes place on a bus, campus staff can review camera footage to determine whether an occurrence requires disciplinary action. According to campus administrators, drivers are following the board policy; however, student behavior on buses continues to be an issue.

Kingsville ISD does not provide clear guidance about how to manage student safety during behavioral escalations, including procedures for contacting the campus or relevant local authorities. The district's Student Code of Conduct does not address steps to follow in these situations. Staff provided inconsistent interpretations of who has the authority to remove students from the bus, whether it is the driver, the principal, or another administrator. The district's inconsistent campus-level responses may not align with discipline management techniques consistent with the Student Code of Conduct.

The district's primary responsibility in transporting students in district vehicles is to do so as safely as possible; therefore, the operator of the vehicle must focus on driving free from distractions by student misbehavior. Lack of behavior-management procedures for student riders presents potential safety and liability issues for the district. Without clear behavior-management practices, drivers could have a higher risk of being distracted by student behavior. Effective practices ensure that drivers and staff use consistent processes related to student behavior on buses.

Kingsville ISD should develop and implement behavior-management procedures for student transportation services.

Kingsville ISD's assistant superintendent of curriculum and instruction and the transportation foreman should develop a collaborative plan with principals, campus administrators, and others as appropriate, regarding the correct and timely response to student discipline issues that occur on the bus and in loading areas.

For this plan to be effective, the district must establish accountability for administrators, drivers, and students. The plan must include reasonable, progressive discipline steps and should require the consistent and timely handling, tracking, and monitoring of all student discipline referrals. The plan also must require continuing training for all students, drivers, and affected staff regarding district bus policies. Kingsville ISD should establish a method to track all referrals throughout the process, to identify and address trends, and to develop, update, and deliver training.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATION

During the onsite visit, the review team observed an additional issue regarding the district's programs and services to students, staff, and the community. This observation is presented for consideration as the district implements the report's other findings and recommendations.

Kingsville ISD performs a majority of the district's maintenance and repairs on district buses and white fleet vehicles. According to the transportation foreman, the process for maintenance and repairs is ongoing as the department attempts to keep the aging fleet in service. The district currently has one indoor garage bay and one outdoor bay to perform maintenance and repairs for all district-owned vehicles. According to the transportation foreman,

these bays are always in use, and the outside bay is not usable during inclement weather. Staff reported that the mechanics struggle to complete repairs in a timely manner due to a lack of appropriate space to perform the work. The facility has ample space to add additional bays to the metal building housing the repair bays. The district should consider adding one or two maintenance bays to the transportation building to facilitate ongoing vehicle maintenance and repairs.

FISCAL IMPACT

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