Lamesa Independent School District

LEGISLATIVE BUDGET BOARD STAFF

JULY 2011

RESOURCES FOR LEARNING, LLC

Lamesa Independent School District

Legislative Budget Board Staff and
Resources for Learning, LLC

July 2011

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LEGISLATIVE BUDGET BOARD

Robert E. Johnson Bldg.
1501 N. Congress Ave. - 5th Floor
Austin, TX 78701

512/463-1200
Fax: 512/475-2902
http://www.lbb.state.tx.us

July 15, 2011

Mr. Scott Davis
Superintendent
Lamesa Independent School District

Dear Mr. Davis:

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

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

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

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

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

Respectfully submitted,

John O'Brien
Director
Legislative Budget Board

cc: Ms. Jill Cowan
Mr. Tracy Harris
Mr. Raymond Garcia
Mr. Albert Martinez
Ms. Sonya Raney
Ms. Krista Powell
Mr. Rick Moreno

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EXECUTIVE SUMMARY

Lamesa Independent School District's (LISD's) school performance review notes 13 commendable practices and makes 74 recommendations for improvement. This Executive Summary highlights the district's significant accomplishments and presents the review team's findings and recommendations. A copy of the full report is available at www.lbb.state.tx.us.

SIGNIFICANT ACCOMPLISHMENTS

STAFF MORALE

LISD district leaders have created a number of programs to help improve staff morale and create loyalty to the district. Programs like Team Lamesa that bring staff together for community projects; a recruitment video that highlights the district's philosophy and goals and provides potential employees with a glimpse of the district's facilities, staff, and students; and a tuition-based onsite child care program for staff are initiatives the district developed to help foster camaraderie among staff, facilitate teamwork and ultimately retain staff in the district.

MIGRANT EDUCATION PROGRAM

LISD's migrant education program (MEP) is an example of the district serving a high-needs population well by providing effective service delivery; using outreach strategies that engender trusting family relationships and that involve, engage, and support parents; and establishing community partnerships to meet student and family needs. Specifically, LISD MEP staff conducts home visits of students who register and list their employment as agriculture and check rosters of each campus to identify already-enrolled students who are eligible for migrant services. These contacts with migrant families provide an opportunity for MEP staff to assess family needs and provide referrals and/or coordinate district and community support services, such as medical/health, legal, transportation, childcare, and emergency food and housing assistance. Additionally, early education home-based services are provided by the LISD MEP for migrant children from birth to age 3 and children aged 3–5 not participating in other programs such as HeadStart. Finally, LISD's Title I/Migrant Parent Advisory Council (PAC) provides a way that migrant parents can comfortably interact with school staff and gain information about educational policy and opportunities.

FACILITY MASTER PLAN

LISD developed a facility master plan specifically for the high school to aid in modernizing the campus. Beginning in September 2009, LISD worked with an engineering and architectural design firm to develop a suitable master plan for Lamesa High School. Information was extracted from the previous facility condition assessment, space utilization study, and education adequacy study to investigate several options for the high school renewal. Various design schemes were filtered through the Citizen's Advisory Committee to review alternative concept designs for suitability and functionality. The Committee approved a design scheme that was presented to the LISD Board of Trustees in August 2010. The master plan has provided the district with the data necessary to make informed decisions regarding projected needs for the future.

SIGNIFICANT RECOMMENDATIONS

COMMUNITY INVOLVEMENT

Despite good relations with many community and business leaders, LISD does not have a strong, positive brand across the community and has not addressed the overall public perceptions of the district or parent relationships. Further, the district has not been responsive to the changing needs of the families and the students it serves. LISD has seen a steady decrease in student enrollment, and district demographics are changing, with a high number of students coming from economically-disadvantaged families. While the county overall has seen a decrease in population, recent enrollment decreases in the district reflect a growing number of student transfers from LISD to nearby smaller school districts. **The district should create a positive brand and public relations plan to enhance community and parent perceptions and involvement.**

HUMAN RESOURCES DEPARTMENT STRUCTURE AND PROCESSES

Lamesa ISD's Human Resources (HR) Department lacks a cohesive delivery of services to district staff possibly due to a fragmented department structure, lack of a plan to carry out those services, and insufficient HR-related training to ensure the district conforms with state and federal laws, rules, regulations, guidelines and best practices. This lack of cohesion may have led to inconsistencies such as position

misclassifications, miscalculation of overtime compensation, the method of storing personnel medical records, multiple and inconsistent employment applications, inaccurate and inconsistent job descriptions, and inconsistent application of performance evaluations for all employees. **The district should restructure the Human Resources (HR) Department, create a plan to include HR strategies, specific objectives, timelines, budget information, and specific evaluation activities, and train all department staff to ensure the district is conforming to state and federal laws, rules, regulations, guidelines and best practices.**

EDUCATIONAL SERVICE DELIVERY

LISD's educational programs lack sufficiently high expectations to ensure that all students have the opportunity to learn. Students in LISD exhibit a wide range of performance. In general, overall district performance is below state and regional averages. Additionally, LISD students do not approach the state average on the Academic Excellence Indicator System (AEIS) College Readiness Indicators, such as advanced course/dual enrollment completion, recommended and distinguished plan graduates, Advanced Placement (AP)/International Baccalaureate (IB) results, Texas Success Initiative (TSI) Higher Education Readiness Component, Scholastic Assessment Test (SAT) results, and College-Ready graduates. While the district has taken a number of steps to address these achievement gaps, numerous comments made during the onsite review by LISD administrative and teaching staff indicated a lack of consistent high expectations for students in the district. **The district should ensure the Board of Trustees, Central Office staff, principals, assistant principals, teachers, aides, and other staff advocate success for all students. High expectations for student performance begin with leadership and extend to all areas of the district.**

PLANNING

LISD lacks a long-range strategic planning process to provide direction in meeting the needs of the community and district. A comprehensive strategic planning process ensures agreement on district direction; use of resources; and goals for Central Office staff, campus personnel, and principals; and includes a process for monitoring and adjusting direction based on evaluation and includes all functions that are correlated to the budget. The lack of planning places the district in a reactive mode, concentrating mostly on immediate problems instead of preparing for future issues. For example, in the area of computers and technology, the district's Long-Range Technology Plan was developed without active participation by all members of the district's Technology Committee and is outdated and not linked to the District Improvement Plan (DIP). Additionally, LISD has engaged in limited efforts devoted to safety and security planning. Finally, the HR department does not engage in either long or short term planning that include HR strategies beyond immediate staffing needs, specific objectives (activities/tasks), timelines, budget information, and specified department evaluation activities.

Recommendations to assist the district in planning include:

- **Develop a three- to five-year comprehensive strategic plan to ensure the district is addressing community and student needs;**
- **Create a planning group to address the needs of LISD's special education students, especially in regard to teacher training, the use of teaching assistants, and discipline;**
- **Create a plan to include Human Resources strategies, specific objectives, timelines, budget information, and evaluation activities;**
- **Create an active and engaged Technology Committee to develop a three- to five-year long-range technology plan; and**
- **Update safety plans and the emergency operations plan to meet current standards and requirements.**

POLICIES AND PROCEDURES

LISD generally lacks policies and procedures for guiding and implementing district activities in several financial, operational, and educational areas. District policies help communicate information to interested stakeholders, while procedures guide district staff in implementing those policies. Without policies and procedures, district staff lacks guidance which often results in varied implementation of common district activities. In the area of financial management, the district does not have a comprehensive budget development process with full stakeholder participation, which results in community members feeling excluded from district processes. Additionally, the district does not have a fund balance board policy to communicate the reasons for its large fund balance and to assure stakeholders that the district has developed a long range plan for how to use it. Finally, many of the district's facilities initiatives and processes—such as

construction and project management, operations and maintenance, facilities planning, consistent tracking of utility bills and energy consumption—are informal and lack documentation.

Recommendations to assist the district in developing policies and procedures include:

- **Create a formal board policy regarding the district's fund balance;**
- **Continue to improve the budget development process by documenting procedures and collecting documents in a budget development manual;**
- **Formalize and document facilities planning and maintenance policies and procedures to ensure effective planning, construction, operation, and maintenance of the facilities;**
- **Develop a district energy management program and policy to conserve energy and reduce costs; and**
- **Develop an administrative procedure that helps to communicate Board of Trustees activities more effectively.**

PROFESSIONAL DEVELOPMENT AND TRAINING

LISD lacks a comprehensive plan for professional development and training for district staff in multiple areas, including instructional, business service, Human Resources, and maintenance and operations. A focused professional development program equips staff with additional knowledge and skills to effectively address student needs and provides information and training regarding district programs and tools. Additionally, training ensures that staff members are informed of changes in law, rules, and regulations. In the area of educational service delivery, LISD does not have a systematic professional development plan in place to provide all teachers and teaching assistants with the skills they need to ensure that all students have opportunities to learn at their highest potential. Additionally, little HR-related training for staff occurs which could put the district at a disadvantage due to frequent changes in state and federal laws, rules, and regulations related to HR functions.

Recommendations to assist the district in developing and implementing professional development and training for district staff include:

- **Implement a systematic and strategic districtwide professional development plan for all instructional staff that provides differentiated learning opportunities based on staff needs and student performance data;**
- **Determine staff development needs for business services staff and develop a monitoring plan to provide such staff development;**
- **Develop and fund a formal operations and maintenance training/professional development program; and**
- **Train all HR department staff to ensure the district is conforming to state and federal rules, regulations, guidelines and best practices.**

CONTRACT MANAGEMENT

LISD does not have a documented process for management of contracted services. There are no written policies and procedures, and no provision for centralized monitoring of either contracts or vendor performance. Without monitoring, the district cannot be assured that contracts and vendor performance are being monitored in a consistent and timely manner. For example, in the area of child nutrition services, the district does not effectively manage, monitor, or evaluate the child nutrition program operations to ensure that the district is in compliance with regulations governing the programs. Additionally, in the area of computers and technology, the lack of oversight of a consultant hired by the district has resulted in LISD filing for eligible E-Rate funding, but not receiving any funds. Furthermore, the district has contracted for more than $44,000 over the three years, starting in school year 2010–11, for a curriculum management tool that had not been delivered at the time of the onsite review in February 2011.

Recommendations to assist the district in developing more effective contract management include:

- **Develop administrative procedures for management of contracted services;**
- **Develop a plan to manage the E-Rate discount funding at the district level; and**
- **Reevaluate the contract with the curriculum management company to ensure the product will meet district needs efficiently considering the delay in receiving the curriculum tool and that significant curriculum development still needs to occur in this effort.**

CHILD NUTRITION PROGRAM OVERSIGHT

LISD lacks a comprehensive oversight plan to remain directly involved in and closely monitor the child nutrition program operations to ensure that the district is in compliance with all state and federal regulations governing the program; and that program funds are maximized to deliver the highest affordable quality of food and service to LISD students. The district has contracted their child nutrition services for the past 28 years to a Food Service Management Company (FSMC) and appears to have placed significant reliance on them to oversee all aspects of the food service program. Consequently, this reliance by the district on the FSMC may have led to disparities between regulatory requirements and district actions such as: claiming federal reimbursement for breakfasts that do not meet meal pattern requirements; failure to conform to the collection method outlined in the district's policy statement yielding an inaccurate count for claiming reimbursable breakfasts; and failure of the designated district reviewing official to determine eligibility and to sign applications for free and reduced-priced meals.

Recommendations to assist the district in managing Child Nutrition Services include:

- **Develop a comprehensive oversight plan to ensure that the district is in compliance with all state and federal regulations governing the programs; and**
- **Cooperate with the Texas Department of Agriculture (TDA) regarding the recommendation of the Legislative Budget Board (LBB) that TDA conduct an investigation of Lamesa ISD's child nutrition program under provisions of the US Code of Federal Regulations (CFR) Title 7CFR 210.19(A)(1)(c)(vii)(5) regarding investigations which cites: "Each State agency shall promptly investigate complaints received or irregularities noted in connection with the operation of the Program, and shall take appropriate action to correct any irregularities." The TDA investigation should review the actions and environment leading to the program discrepancies in the Lamesa ISD Child Nutrition program.**

The LBB has requested a TDA investigation regarding these issues.

GENERAL INFORMATION

- LISD is located in Lamesa, Texas, 62 miles south of Lubbock and is the county seat of Dawson County. The first school was opened in Lamesa in 1902, and the town was incorporated in 1917.
- LISD had a total enrollment of 1,924 students in school year 2009–10, slightly down from 1,942 students in school year 2008–09. The district has seen a steady decrease in student enrollment.
- Over the past five years, the district's enrollment has decreased 5.6 percent (2,038 students in school year 2005–06). Furthermore, since school year 2000–01, the district's enrollment has decreased by almost 20 percent (2,404 students in school year 2000–01).
- The district's student population in school year 2009–10 represents an ethnicity of predominantly Hispanic students (73.7 percent), with smaller representations of White students (19.5 percent), African American students (5.9 percent), Asian/Pacific Islander students (0.7 percent), and Native American students (0.2 percent). The district had a greater number of economically disadvantaged students (74.2 percent) than the state average (59.0 percent).
- The district's academic rating from the Texas Education Agency fell from *Academically Acceptable* in school year 2008–09 to *Academically Unacceptable* in school year 2009–10 due to Completion Rate I (students who graduated or continued) for Hispanic Students on the Texas Assessment of Knowledge and Skills (TAKS).
- The district had a higher fund balance as a percent of total budgeted expenditures (48.7 percent) than the state average (19.1 percent) in school year 2009–10. In the district's 2008–09 Annual Financial Report, the external auditor noted that the district continued with efforts to build designated fund balance in order to complete capital projects, and in school year 2009–10 will maintain $3 million designated fund balance in its Instructional Improvement Fund and $2 million in its Capital Improvement Fund designated for facilities improvement of $2 million.
- In school year 2009–10, LISD had 335.8 staff, with 46.6 percent being teachers.
- LISD is served by the Regional Education Service Center XVII (Region 17) located in Lubbock.
- The legislators for the district are Senator Robert Duncan and Representative Tom Craddick.

SCHOOLS

The district has five schools, including the following:

- South Elementary School (Pre-K–2)
- North Elementary School (3–5)
- Lamesa Middle School (6–8)
- Lamesa High School (9–12)
- Lamesa Success Academy (Disciplinary Alternative Education Program)

FINANCIAL DATA

- Total actual 2009–10 expenditures: $18.8 million
- 2009–10 Tax Rate: $1.170 ($1.170 Maintenance and Operations and $0.000 Interest and Sinking).
- Final total wealth per student (2009–10): $210,586 with final wealth per Weighted Average Daily Attendance (WADA) (2009–10) at $154,965.
- In school year 2009–10, 57.2 percent of total actual expenditures were spent on instruction while 59.6 percent of actual operating expenditures were spent on instruction.
- Instructional expenditure ratio (general funds) was reported at 63.1 percent compared to 64.9 percent for the state average.

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

Each chapter concludes with a fiscal impact chart listing the chapter's recommendations and associated savings or costs for school years 2011–12 to 2015–16.

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 following table summarizes the fiscal impact of all 74 recommendations in the performance review.

FISCAL IMPACT

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
Gross Savings	$206,559	$206,559	$206,559	$206,559	$206,559	$1,032,795	$0
Gross Costs	($192,039)	($192,039)	($192,039)	($192,039)	($192,039)	($960,195)	($19,740)
TOTAL	**$14,520**	**$14,520**	**$14,520**	**$14,520**	**$14,520**	**$72,600**	**($19,740)**

CHAPTER 1

DISTRICT ORGANIZATION

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 1. DISTRICT ORGANIZATION

The Lamesa Independent School District (LISD) is located in Lamesa, Texas, 62 miles south of Lubbock and is the county seat of Dawson County. Dawson County was organized in 1905 and named in honor of Nicholas Mosby Dawson (1808-1842) who fought at the Battle of San Jacinto and fell at Dawson's Massacre. The 1900 Census listed 37 persons residing in Dawson County. The estimated county population in 2009 was 13,657, with a 8.9 percent decrease in population since 2000. The top four industries providing employment in the county are the following:

- educational services, health care and social assistance (21.6 percent);
- agriculture, forestry, fishing and hunting, and mining (18.8 percent);
- public administration (10.1 percent); and
- retail trade (9.6 percent).

Lamesa is a town of 8,815 residents. The name Lamesa was taken from the Spanish word mesa meaning "tableland." The first school was opened in Lamesa in 1902, and the town was incorporated in 1917. LISD serves just over 1,900 students at five campuses: South Elementary, North Elementary, Lamesa Middle School, Lamesa High School, and Lamesa Success Academy. A review of Academic Excellence Indicator System (AEIS) reports indicates that the student population has decreased by approximately one-third over the last 20 years, from 2,901 in school year 1990–91 to 1,924 in school year 2009–10.

According to 2009–10 Public Education Information Management System (PEIMS) Standard Reports for the district, approximately 74 percent of LISD students were Hispanic, 20 percent were White, 6 percent were African American, and 0.7 percent were Asian/Pacific Islander. In addition, approximately 74 percent of students were economically disadvantaged (the state average was 59 percent), and 58 percent were identified as at risk (the state average was 47 percent). The median household income was $34,901 in 2008, and the percent of the population in poverty was 27 percent.

The district is governed by a seven-member Board of Trustees (**Exhibit 1–1**) elected through five Single-Member districts and two At-Large districts. There were three positions open for the May 2011 election. Krista Powell and Enrique (Rick) Moreno were elected to fill the At-Large positions held by Cora Brown and Russell Cox, both of whom did not seek re-election. Additionally, Sonya Raney was elected to fill the Single-Member position held by Lynn Vaughn, who did not seek re-election. The Board of Trustees meets monthly on the third Tuesday of the month at 6:00 PM in the district board room in the LISD Central Office, located at 212 North Houston Street.

LISD's superintendent oversees management of daily operations of the district and is charged with effectively

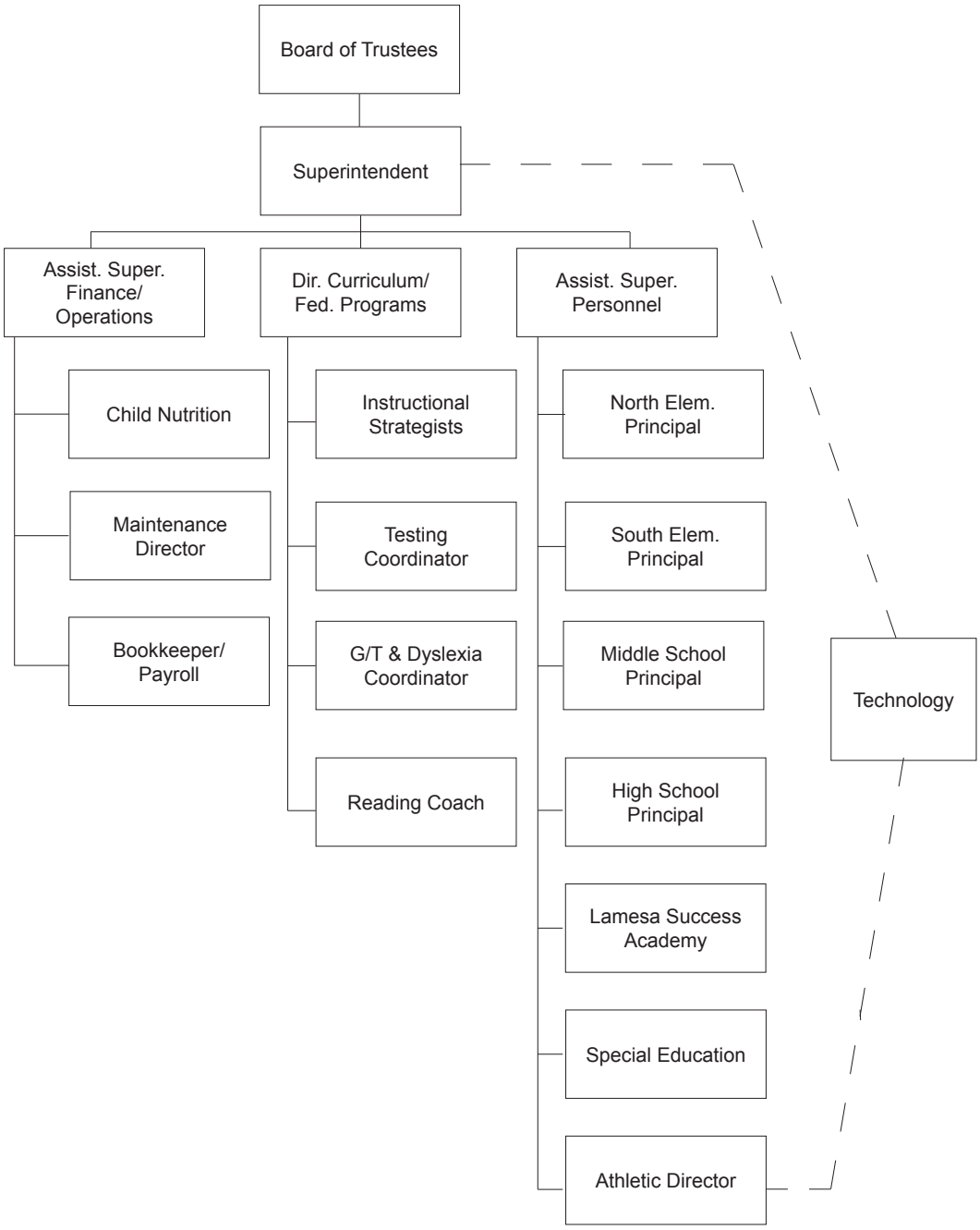
EXHIBIT 1-1
LAMESA ISD BOARD OF TRUSTEES
SCHOOL YEAR 2010–11

NAME	TITLE	TERM EXPIRATION	LENGTH OF SERVICE	OCCUPATION
Jill Cowan	President	May 2012	5 years	Homemaker, part-time dental assistant
Cora Brown	Vice President	May 2011	27 years	Director, Dawson County Senior Citizens Center
Raymond Garcia	Secretary	May 2012	5 years	Firefighter
Russell Cox	Member	May 2011	3 years	Self-employed farmer
Tracy Harris	Member	May 2013	4 years	Self-employed farmer
Albert Martinez	Member	May 2012	26 years	Self-employed farmer
Lynn Vaughn	Member	May 2011	13 years	Parts manager, Lamesa Bearings

NOTE: In May 2011, Krista Powell, Enrique (Rick) Moreno, and Sonya Raney were elected to fill the board positions held by Cora Brown, Russell Cox, and Lynn Vaughn.
SOURCE: Lamesa Independent School District administration, March 2011.

executing the policies adopted by the Board of Trustees. Superintendent Scott W. Davis has served the district since 2002 as high school assistant principal, high school principal, assistant superintendent of Personnel, and now superintendent. Other Central Office cabinet member positions are reflected in the organization chart in **Exhibit 1–2** and include an assistant superintendent of Personnel, an assistant superintendent of Finance and

EXHIBIT 1-2
LAMESA ISD ORGANIZATION
SCHOOL YEAR 2010–11



SOURCE: Lamesa ISD, February 2011.

Operations, and a director of Curriculum and Federal Programs.

FINDINGS

- LISD leadership does not have a proactive process to promote high expectations for all students.
- LISD's organization and reporting structures create confusion and do not provide clear direction for campus administrators.
- LISD lacks a long-range strategic planning process to provide direction in meeting the needs of the community and district.
- LISD does not have a well-timed annual district planning cycle in place to ensure budget support and timely implementation of goals, objectives, and strategies.
- LISD's Board of Trustees does not have a process to ensure all board members meet continuing education requirements prescribed by Texas Education Code (TEC) §11.159.
- The LISD Board of Trustees does not adhere to the recommended comprehensive process for the superintendent's evaluation.
- LISD does not have a process to ensure timely posting of Board of Trustees meeting notices on the website to meet Board Policy BE (LEGAL).
- The Board of Trustees lacks a procedure to ensure that member attendance is monitored, resulting in challenges to moving the district forward with all board members informed on the issues.
- LISD lacks a consistent public information system to ensure the community has the opportunity to be informed about Board of Trustees meetings, the decisions made in board meetings, and to provide input at the meetings.

RECOMMENDATIONS

- **Recommendation 1: Create a proactive process for raising expectations for all students.**
- **Recommendation 2: Review current reporting practices, district policies, and job descriptions to determine and articulate the most efficient reporting structure.**
- **Recommendation 3: Develop a three- to five-year comprehensive strategic plan to ensure the district is moving forward and addressing current and future community and student needs.**
- **Recommendation 4: Establish a schedule for the development of district and campus plans for Board of Trustees approval prior to budgeting in July/August of each school year.**
- **Recommendation 5: Ensure all board members meet continuing education requirements.**
- **Recommendation 6: Develop a comprehensive superintendent evaluation process.**
- **Recommendation 7: Post Board of Trustees meeting agendas in a timely manner to ensure adequate notification is provided to all interested parties.**
- **Recommendation 8: Develop standard operating procedures for the Board of Trustees that includes a procedure requiring all members to attend each board meeting unless extenuating circumstances exist.**
- **Recommendation 9: Develop an administrative procedure that helps to communicate Board of Trustees activities more effectively.**

DETAILED FINDINGS

FOCUSING ON HIGH EXPECTATIONS (REC. 1)

LISD leadership does not have a proactive process to promote high expectations for all students. As described in detail in the Educational Service Delivery chapter of this report, LISD performance data indicate significant achievement gaps between the district and state averages for student performance and between the Hispanic and White student groups in the school district. As stated previously, LISD's 2010–11 school year student population is approximately 74 percent Hispanic, 20 percent White, 6 percent African American, and 0.7 percent Asian/Pacific Islander. In addition, approximately 74 percent of students are economically disadvantaged (the state average was 59 percent), and 58 percent are identified as at risk (the state average was 47 percent).

Interviews with Board of Trustees members, administrators, and teachers indicated that there is a consistent perception that the lower than average performance of many of the

students is beyond the control of the district and that it is a result of values and beliefs that exist in the students' homes. There is a predominant perception that academic achievement is not encouraged at home and, as a result, students do not value academic success.

Currently, student performance gaps are addressed in the district and campus plans with a Texas Assessment of Knowledge and Skills (TAKS) goal. Each plan has multiple programmatic strategies for increasing student performance on TAKS; however, a review of the plans indicates that none of these include strategies to address increasing student, parent, teacher, and administrator expectations for student performance.

In *Raising Expectations to Improve Student Learning*, author Jerry Bamburg says, "the expectations teachers have for their students and the assumptions they make about their potential have a tangible effect on student achievement." He points out that research "clearly establishes that teacher expectations do play a significant role in determining how well and how much students learn." James Raffini, in *Winners Without Losers: Structures and Strategies for Increasing Student Motivation to Learn* believes that students tend to internalize the beliefs teachers have about their ability. He says that generally students "rise or fall to the level of expectation of their teachers. . . . When teachers believe in students, students believe in themselves. When those you respect think you can, YOU think you can."

Bamburg contends that if teachers are to change their expectations for students, it is not "unreasonable to assume that the classroom is not the only place where change is needed." He states that it is the administration's responsibility to provide leadership for the shift in expectations. He refers to Peter Senge's belief that the only successful organizations in the future will be those in which everyone is a learner. Referring to Senge's work, Bamburg says, "for schools to become learning organizations, the school's leader(s) must accept responsibility for creating conditions that promote and enhance learning for everyone." Leadership in LISD must create a proactive process for raising expectations for all students.

Administrators must model these expectations by overtly participating in studying the effects of teacher expectations for students and providing leadership in sharing information about the impact of expectations with all staff. The initial study could involve a series of book studies, led by the superintendent, including key Central Office and campus leadership staff. The superintendent and his leadership staff should then lead the planning of a series of activities, possibly over several years, beginning with a fall retreat for all teachers and a review of findings from the book study. Ultimately, goals related to increasing student expectations, with identified strategies and resources, should be included in the recommended district strategic planning process for integration into annual district and campus plans and, thus, into the daily fabric of school and district culture.

Implementation of such a process could include the following steps:

- The superintendent, Central Office staff, and campus administrators should identify a series of books related to the effects of adult expectations on student performance to read and study together.
- Leadership book studies should begin immediately and continue throughout the summer.
- The superintendent should identify a planning committee of leaders and teachers to design a retreat for campuses, which includes follow-up book study activities for teachers at each campus.
- The retreat should be held in late summer prior to the beginning of school.
- Following the retreat, principals should conduct a follow-up series of book studies with teachers to identify methods of examining teacher expectations. These could be conducted for the entire campus by grade level or by department during the first four six-week periods of the school year, with ongoing follow-up activities at every principal meeting. As a part of this year-long study, during the last two six-week periods, activities for increasing teacher expectations of students should be identified and incorporated into the district and campus plans for the following year.
- The superintendent, as leader of the district improvement committee, should ensure that the process becomes a part of the district and campus plans for school year 2011–12.

A total one-time cost of for the retreat and book purchase would be $4,700 ($1,700 + $3,000). The breakdown of the one-time cost for this recommendation is as follows: two facilitator leaders for the fall one-day retreat at $850 each would cost a total of $1,700. In addition, the district would need 30 copies of four book titles at $25 per book, for a

total of $3,000 (30 copies x 4 book titles x $25 per book). Each book title set could be rotated through the four campuses during the first four six-week periods as teachers engaged in different book studies of different books at each campus.

REPORTING STRUCTURE AND JOB RESPONSIBILITIES (REC. 2)

LISD's organization and reporting structures create confusion and do not provide clear direction for campus administrators. The alignment of essential functions with executive leadership ranks is important in any organization. Efficient organizational alignment is essential to ensuring that effective support is provided in a coordinated manner with clear day-to-day communication and supervision. A review of the LISD organization chart, district job descriptions, and interviews with Central Office and campus administrators indicated a lack of clarity regarding Central Office position responsibilities. Interviews with teachers further supported this finding that district staff lacks understanding of the overall organization design and decision-making process.

The organization chart indicates that the assistant superintendent of Finance and Operations, the assistant superintendent of Personnel, and the director of Curriculum and Federal Programs report directly to the superintendent. It further reflects supervisory roles. The assistant superintendent of Finance and Operations supervises the district's food service, maintenance, and accounting functions, and the director of Curriculum and Federal Programs manages regular education, migrant education, and the district's gifted and talented and dyslexia programs. The assistant superintendent of Personnel, in addition to all personnel functions, supervises campus principals and the Special Education Department.

However, in practice, principals report to both the superintendent and the assistant superintendent of Personnel. Both administrators have daily contact with campus administrators and conduct separate monthly meetings with them. A review of district documents and interviews with Central Office and campus administrators indicated that there is no clear articulation of which of the two administrators is responsible for supervising specific components of the principals' job descriptions. It is unclear which administrator should be contacted to provide direction for which activities. During interviews, the superintendent and assistant superintendent of Personnel indicated that there is, in fact, no clear delineation of responsibilities between the two as it relates to areas of supervision of principals.

In addition, the organization chart indicates that the director of Curriculum and Federal Programs reports directly to the superintendent; however, the job descriptions of both the director of Curriculum and Federal Programs and the assistant superintendent of Personnel indicate that the director of Curriculum and Federal Programs reports to the assistant superintendent of Personnel.

John Wallen, in an article entitled *Charting the Decision-Making Structure of an Organization,* states that when creating an organization chart one should remember that "theoretically, each manager is responsible for more work than he can personally do. Therefore, he delegates subsections of his responsibilities to others who are then said to report to him . . . creating the lines of delegation and the lines of accountability." The organization structure, then, informs employees who they can delegate work to and to whom they are accountable for their own work. Not understanding to whom one is ultimately accountable creates a lack of focus or direction for one's responsibility. In the case of school business, it leads to uncertainty about organizational goals and decision-making authority in relation to those goals.

The superintendent should design and lead a process to review current reporting practices, district policies, and job descriptions to determine and articulate the most efficient reporting structure. The process should include Central Office and campus staff in discussions to ensure the superintendent fully understands the needs of the campuses and where communication gaps, inefficiencies, and duplication exist in the reporting process. In addition, the superintendent should consider the role of the employee in the organization and the impact of the supervisor to that role. The superintendent has a valuable opportunity to set and model expectations for principals by having a direct line of communication and reporting with them. The importance of the superintendent in modeling desired attitudes cannot be overstated, especially given the district's current enrollment decline and the articulated need to change the community's perception of the district further discussed in the Community Involvement chapter. The superintendent and principals can play key roles in this change effort.

This recommendation can be implemented with existing resources.

STRATEGIC PLAN (REC. 3)

LISD lacks a long-range strategic planning process to provide direction in meeting the needs of the community and district. A review of district documents and interviews with Board of Trustees members and administrators indicated that LISD develops an annual district improvement plan (DIP) and campus improvement plans (CIPs) based on a comprehensive needs assessment. While this is a good start, two areas are lacking. First, the DIP and CIPs provide insufficient guidance on how to monitor implementation and assess progress of identified strategies. Secondly, these plans do not provide long-term direction for the district.

While the annual DIP and CIPs identify strategies to help reach state goals, there is little evidence that the strategy implementation is monitored and progress assessed. For example, the DIP Goal #4 is to meet the state standard for Scholastic Assessment Test (SAT)/American College Test (ACT) testing. The state tests at a rate of 62 percent. The district rate is 42 percent. The DIP objective states the percentage of students taking the SAT/ACT will increase to 50 percent. Strategies listed to achieve the goal include Advanced Placement (AP) training, Gifted and Talented (G/T) certification, and SAT/ACT reviews among other items. It may help the district meet the goals to identify specific measures with target outcomes and a process for monitoring progress. For illustrative purposes, the district may identify an achievable goal, such as, the percent taking the SAT/ACT will increase to 45 percent (50 percent may be a two- or three-year goal). Enabling steps such as over-identifying students, identifying early test dates, enrolling in SAT/ACT reviews, registering for tests, and testing would then be identified. If target outcomes are not met, the district should assess why. This same process may be applied to other goals and objectives. Strategies need measurable outcomes that are attainable and clear steps for assessing implementation.

Concerning long-term strategic planning, there is no evidence of a comprehensive strategic planning system that begins with the Board of Trustees and superintendent identifying district priorities and enlisting the thinking of a broad span of district and community stakeholders to create goals and objectives. Planning would form the basis of the DIP and CIPs for three to five years.

A comprehensive strategic planning process ensures agreement on district direction, use of resources, and goals for Central Office staff, campus personnel, and principals. A systemic planning process also includes a process for monitoring and adjusting direction based on evaluation and includes all functions that are correlated to the budget. In addition, the process allows for the use of several teams that include staff, parents, community members, and often, students to provide input into the planning process. This type of planning process provides a tool for bringing the community together. It empowers stakeholders to become engaged in district schools and offer ideas that may enhance the services for the individual stakeholder groups. Stakeholder participation provides some level of shared decision-making regarding the direction and monitoring of district progress.

Chris Ahoy, associate vice president of Facilities Planning and Management of Iowa State University, states that many organizations (including schools) spend most of their time reacting to unexpected changes instead of anticipating and preparing for them. These organizations get caught off guard and spend a great deal of time and energy in crisis management "playing catch up." Because these organizations are focused on coping with immediate problems, they have little energy left to anticipate and prepare for the next challenges. Such an approach locks an organization into a reactive posture.

To counteract this approach, Ahoy recommends strategic planning as a well-tested process that provides a viable alternative to crisis management. Strategic planning looks three to five years ahead. It charts a definite course based on strong indicators of what the environment will be like in those years. Strategic planning is dependent on a collaborative look at upcoming demographic statistics, economic indicators, government policies, and technological advances. Some of these trends represent potential opportunities, potential threats, or both. However, examining and planning to meet the challenges ahead helps the organization take full advantage of future opportunities and minimize potential threats.

Strategic planning is a key to helping organizations use resources more effectively to guide the destiny of the district and the future success of its students. Benefits of strategic planning include the following:

- forcing a look into the future and thereby providing an opportunity to influence the future or assume a proactive posture;
- providing better awareness of future needs and issues;
- helping define overall mission of the organization and focusing on the goals and objectives;
- providing a sense of direction, continuity, and effective staffing and leadership; and

- including everyone in the system and providing standards of accountability for people, programs, and allocated resources.

In summary, says Ahoy, strategic planning is the key to helping collectively and cooperatively gain control of the future and destiny of the organization.

Common components of a school district strategic plan include comprehensive, collaborative review and design of the following:

- value statements;
- mission statements;
- vision statements;
- purpose statements; and
- needs assessments, which involve reviewing strengths, weaknesses, opportunities, threats (SWOT).

Based on the above, a district strategic plan will include:

- goals;
- objectives; and
- strategies/resources/timelines/evaluations.

These components will be incorporated into annual district and campus plans as appropriate.

LISD should develop a three- to five-year comprehensive strategic plan to ensure the district is moving forward and addressing current and future community and student needs. The district should do the following:

- identify a district facilitation committee to create a timeline for the strategic planning process, identify the participants, and facilitate the logistics of the process;
- identify an external facilitator to facilitate all components of the planning process;
- identify a district steering committee representing all of the stakeholder groups, including parents, students, community members, business members, central office staff, campus administrators, and teachers/ counselors/teaching assistants to identify the overall direction, values, mission, vision, purpose, and goals;
- identify an action planning committee, consisting of LISD staff, students, and parents to write objectives, create strategies, identify resources, create strategy timelines, and design evaluation plans;
- ensure that the plan is written, provided to the public for input, and ultimately posted on the district website; and
- ensure that appropriate components of the plan are incorporated into annual district and campus plans.

The planning process described previously would be a one-time cost of approximately $10,000. Several education service centers provide this service. For example, both Regional Education Service Center XIII (Region 13) and Regional Education Service Center XX (Region 20) provide the service for a flat fee of $10,000 for a district the size of Lamesa.

COORDINATING PLANNING AND BUDGETING (REC. 4)

LISD does not have a well-timed annual district planning cycle in place to ensure budget support and timely implementation of goals, objectives, and strategies. Interviews and review of district policies and planning documents indicated that LISD has the required District Improvement Committees and Campus Improvement Committees in place to fulfill the TEC requirements for development of district and campus plans. Additionally, the district has outlined the budget process for school year 2011–12 which includes interaction with campuses and departments for budgetary needs. However, a review of the plans indicates that while the planning process includes the components required by law and policy, the process is not conducted on a timeline for plan approval that ensures adequate budget support for strategy implementation or the alignment of the campus plans with the district plan.

Lamesa Board Policy BQ (LEGAL) states that the Board of Trustees shall annually approve the district and campus performance objectives. The policy further states that the "purpose of the District improvement Plan is to guide district and campus staff in the improvement of student performance for all student groups in order to attain state standards in respect to the student achievement indicators." Board Policy BQB (LOCAL) states that the district shall establish a schedule for the development of campus plans to ensure that they "support the District's educational goals and objectives, and shall be specific to the academic achievement of students served by the campus."

Interviews with administrators and a review of district and campus plans indicate that the plans are developed at the beginning of each school year and approved several months after the beginning of year. **Exhibit 1–3** reflects the dates of

EXHIBIT 1-3
DISTRICT/CAMPUS IMPROVEMENT PLAN TIMELINE
SCHOOL YEAR 2010–11

NAME OF PLAN	DATE APPROVED
Lamesa District Improvement Plan	October 2010
Lamesa High School Improvement Plan	December 2010
Lamesa Middle School Improvement Plan	December 2010
Lamesa North Elementary	December 2010
Lamesa South Elementary	December 2010

SOURCE: Lamesa ISD website, March 20, 2011.

approval of district and campus plans for school year 2010–11. The district plans are not approved in time to drive the campus plans for the school year; nor are the district or campus plans approved prior to budget approval to ensure financial support for the implementation of the strategies. The timeline thus does not allow for August implementation of district and campus strategies to provide maximum time for success of implementation.

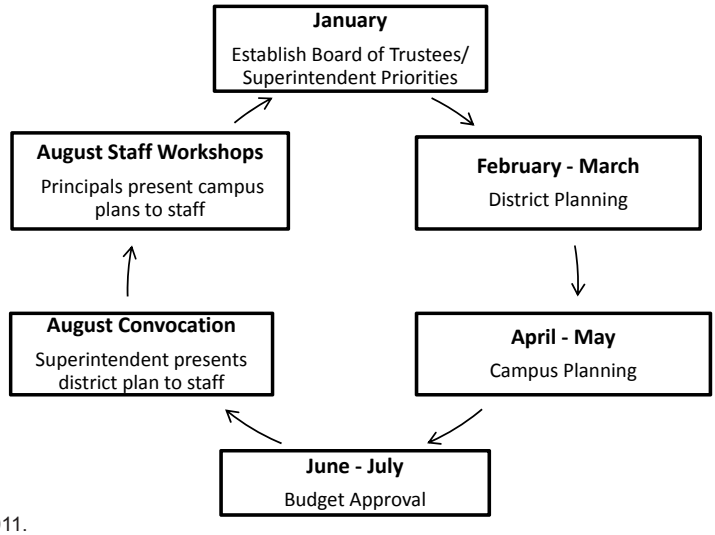
Many districts begin the district and campus planning process well before the end of each school year. Typically, the Board of Trustees and superintendent set priorities/goals for the district at a goal-setting meeting soon after the superintendent's appraisal in December or January. When the district has a strategic plan in place, the Board of Trustees and superintendent review the plan for that school year and apply or modify the strategic plan goals as appropriate. These priorities/goals drive the development of the district plan during February and March, which consequently drives the development of campus plans in April and May. All plans are in draft form by the end of the school year to ensure that strategy implementation resources are included in the budget taken to the Board of Trustees for approval in July/August, and resources are available for implementation in August. Because AEIS results are not received prior to the development of the plans, the goals/objectives directly related to student performance are reviewed and modified at the beginning of the school year. The schedule outlined above allows principals to present the district and campus plans to campus staff during the initial days of school to ensure that all staff begins the school year with a unified direction for the campus and that planned strategies are implemented immediately. **Exhibit 1–4** graphically reflects this recommended process.

LISD should establish a schedule for the development of district and campus plans for Board of Trustees approval prior to budgeting in July/August of each school year.

The following is a timeline for implementation:

- District Improvement Committee develops a schedule to ensure that the planning cycle provides for district and campus plans to be presented to the Board of Trustees prior to the final budget approval in July/August.
- Board of Trustees and superintendent create annual district priorities in January.

EXHIBIT 1-4
PLANNING PROCESS



SOURCE: Region 13, March 2011.

- District Improvement Committee and the superintendent conduct a needs assessment and develop a district plan that reflects the Board of Trustees/superintendent priorities/goals during February and March.
- District Improvement Plan is approved by the Board of Trustees at the March board meeting.
- Principals provide the District Improvement Plan to the Campus Improvement Committees for the Campus Improvement Plan needs assessment and development in April and May.
- Plans are approved by the Board of Trustees in June.
- Strategy implementation resources are considered and approved to be a part of the budget approved in July/August.
- District and Campus Improvement Committees review AEIS results and modify student performance goals/objectives to reflect annual needs.
- Superintendent provides the district plan to all staff during August Convocation.
- Principals provide the campus plan to all campus staff at campus faculty meetings during the opening week of school.

This recommendation can be implemented with existing resources.

BOARD OF TRUSTEES TRAINING (REC. 5)

LISD's Board of Trustees does not have a process to ensure all board members meet continuing education requirements prescribed by Texas Education Code (TEC) §11.159. A review of the Board of Trustees training records and conversations with administrators and Board of Trustees members indicate that members find it difficult to attend Board of Trustees training away from the school district. **Exhibit 1–5** outlines Board of Trustees member training requirements as defined by Texas Administrative Code (TAC) §61.1.

LISD's Texas Association of School Boards (TASB) continuing education records for the past two years indicate that six of the district's seven Board of Trustees members attended the state convention in school year 2008–09, and five of seven attended in school year 2009–10.

Exhibit 1–6 outlines Board of Trustees members' continuing education hours through local and state training for school years 2009–10 and 2010–11. While the majority of board members exceeded the requirements for Tier II, two board members did not meet the Tier III requirements, and one board member did not receive any hours of credit during school year 2009–10. For school year 2010–11, as of February, one experienced board member had received no training, one new board member had received no training, and five board members received Tier III training. While four of the five members exceeded the required Tier III training for school year 2010–11 (the Legislative Update was

EXHIBIT 1-5
BOARD OF TRUSTEES MEMBER TRAINING REQUIREMENTS

TYPE	NEW BOARD OF TRUSTEES MEMBERS	EXPERIENCED BOARD OF TRUSTEES MEMBERS
TIER I		
Local District Orientation	Required within 60 days before/after election or appointment	Not required
Orientation to the Texas Education Code	3 hours	Not required
Legislative Update to the Texas Education Code*	Not required	2 hours*
TIER II		
Team Building/Board Assessment	3 hours	3 hours
TIER III		
Additional training**	10 hours	5 hours
TOTAL	**16 hours + Local Orientation**	**10 hours***

*Level One Update required only in the year the Legislature meets. Off-year requirement is eight hours for experienced Board of Trustees members.
**TAC 61.1 states that in addition to Tiers I and II, each Board of Trustees member shall receive additional continuing education training on an annual basis in fulfillment of assessed needs and based on the framework for governance leadership.
SOURCE: Texas Administrative Code §61.1.

EXHIBIT 1-6
TWO-YEAR SUMMARY OF BOARD OF TRUSTEES TRAINING BY REQUIRED TIER
SCHOOL YEARS 2009–10 TO 2010–11

	TIER I		TIER II		TIER III		
NAME	NEW	EXP	NEW	EXP	NEW	EXP	TOTAL
School Year 2009–10							
Board Member A		0		0		0	**0**
Board Member B		2.00		17.25		11.75	**31.00**
Board Member C		2.00		17.25		3.00	**22.25**
Board Member D		2.00		17.25		3.00	**22.25**
Board Member E		2.00		17.25		3.00	**22.25**
Board Member F		0		17.25		0	**17.25**
Board Member G*							
School Year 2010–11							
Board Member A		NA		0		0	**0**
Board Member B		NA		0		7.50	**7.50**
Board Member C		NA		0		8.50	**8.50**
Board Member D		NA		0		8.50	**8.50**
Board Member E		NA		0		8.50	**8.50**
Board Member F		NA		0		8.50	**8.50**
Board Member G**	0		0		0		**0**

*Resigned from the Board of Trustees.
**Replaced the Board of Trustees member who resigned in February 2011 for remainder of term.
SOURCE: Lamesa ISD superintendent's office (Texas Association of School Boards Board Member Continuing Education Report).

not required as it was an off year for a legislative session), none of the board members met the Tier II requirement. There was no record of the new board member having received the required Local District Orientation or the Orientation to the Texas Education Code during the first 60 days of that member's appointment.

In addition, interviews with the superintendent and Board of Trustees members indicated that none of the Board of Trustees members have received the administrator appraisal training required in TAC §19.150 prior to evaluating the superintendent.

The continuing education required under TEC §11.159 applies to each member of an independent school district Board of Trustees. The requirement consists of orientation sessions, an annual team building session with the local Board of Trustees and the superintendent (Team of Eight), and specified hours of continuing education based on identified needs. TEC recommends that these needs be identified annually through a team self- assessment during the required Tier II team building session. The training plan includes the requirements for all three tiers as described in **Exhibit 1–6**.

The LISD superintendent should ensure that all board members meet continuing education requirements. The superintendent should identify a staff member, possibly the Central Office administrative secretary, to provide and continuously update a list of available local, regional, and state training opportunities to board members. Ensuring Board of Trustees members receive the required training is essential to having an informed Board of Trustees in the areas of educational law, requirements, and best practices in governance. The required team building is critical in ensuring the Board of Trustees and the superintendent work together effectively in addressing district issues.

The superintendent should develop a plan that includes creating a local planning calendar and identifying a staff member to assist him in completing the following tasks:

- create a calendar with the dates of Board of Trustees training opportunities available in the district, region, state, and nation;

- arrange for Texas Education Agency (TEA)-registered board training vendors to present sessions in the district;
- monitor training opportunities and remind board members as the offerings occur;
- monitor and record board member attendance at regional and state training sessions; and
- create and maintain an electronic matrix to record all local, regional, and state trainings attended by each board member.

All three training tiers should appear in the calendar, and the team building/self-assessment (Tier II) should be provided soon after the May election. The staff member identified to help the superintendent encourage board training should help to arrange for board members to attend Board of Trustees sessions away from the district.

This recommendation can be implemented with existing resources.

SUPERINTENDENT EVALUATION (REC. 6)

The LISD Board of Trustees does not adhere to the recommended comprehensive process for the superintendent's evaluation. The appraisal instrument used for superintendent evaluations is based on the general domains recommended in TAC §150.1021 of the Commissioner-Recommended Administrator Appraisal Process. These areas include the following:

- instructional management;
- school or organization morale;
- school or organization improvement;
- personnel management;
- management (administrative, fiscal, and facilities);
- student management;
- school or community relations;
- professional growth and development;
- academic excellence indicators and campus performance objectives; and
- Board of Trustees relations.

The current superintendent evaluation process involves each Board of Trustees member completing an evaluation form. Board members then meet during executive session to conduct a summative evaluation by discussing the results of the individual evaluations and reaching consensus in order to prepare a single summary evaluation that is provided to the superintendent. The superintendent is then invited into executive session to review the appraisal and ask questions or provide more information as appropriate.

LISD Board Policy DNB (LEGAL) reflects the Commissioner-Recommended Administrator Appraisal Process's minimum requirements of establishing an annual calendar that includes the following:

- procedures for setting goals that define expectations and set priorities for the administrator being appraised;
- formative conference; and
- summative conference.

Documents provided by the district and staff reports indicated that goal-setting and formative evaluation were not part of the current evaluation process. Board of Trustees members unanimously agreed that it was difficult to evaluate the superintendent without a standard or set of goals to use as an evaluation bar.

The lack of a goal-setting process for the superintendent also puts the district at risk of lack of focus and unachieved goals, which could impact student achievement. Defining goals and objectives aligned with community and student needs could help board members in their responsibility to represent the interests of the community they serve. As an example, staff and stakeholders at LISD unanimously articulated concern during interviews conducted by the school review team about both the public's negative perception of the school district and the fact that residents are transferring their children to other school districts (see the Community Involvement chapter).

In *A New Board Member's Guide to Superintendent Evaluation,* a publication of the Texas Association of School Boards (TASB) Leadership Team Services Division, the authors state that one of the Board of Trustees' chief responsibilities is to make sure the superintendent is performing duties effectively and, more importantly, is moving the district forward to the achievement of its goals. They continue to say that perhaps the "most significant mechanism for fulfilling this responsibility is the annual evaluation of the superintendent's performance."

TAC 19 §150.1022 requires that "before conducting appraisals, an appraiser shall provide evidence of training in appropriate personnel evaluation skills related to the locally established criteria and process." However, board members reported that they do not receive appraisal training as new board members prior to evaluating/appraising the superintendent. Training in superintendent evaluation should be a priority for board members and could support district goal setting as well as implementation of an ongoing cycle of formative superintendent evaluation (**Exhibit 1–7**).

With this training, the Board of Trustees, with input from the superintendent, should develop a comprehensive superintendent evaluation process that includes the components of the Commissioner of Education's recommended appraisal process for superintendents. The Board of Trustees and superintendent should collaboratively develop a superintendent evaluation process as outlined in the TAC to ensure continuity between the Board of Trustees and the superintendent in identifying goals to drive district and campus planning. Board members should attend superintendent appraisal training prior to participating in the superintendent's appraisal. The district could use the existing Board of Trustees training budget which would eliminate additional impact on the budget.

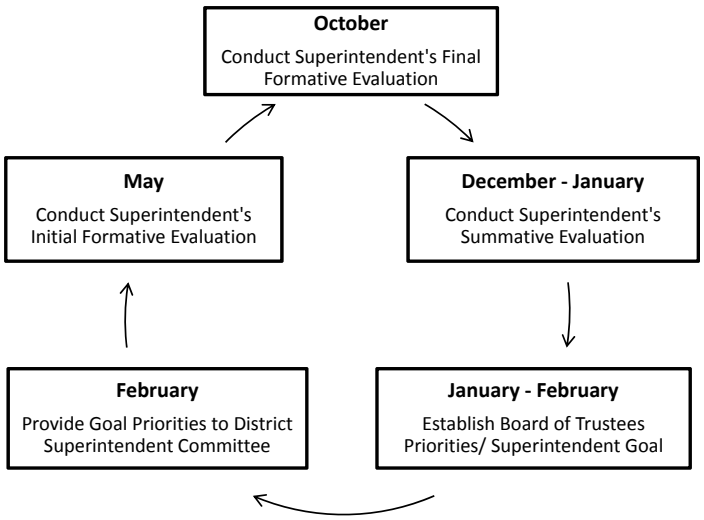
POSTING BOARD OF TRUSTEES DOCUMENTS (REC. 7)

LISD does not have a process to ensure timely posting of Board of Trustees meeting notices on the website to meet Board Policy BE (LEGAL). Currently, the Central Office administrative secretary posts the Board of Trustees agenda (notice) on the window of the Administration Building at 212 North Houston Street in Lamesa at least 72 hours prior to the Board of Trustees meeting. This process meets policy requirements and ensures that the paper agenda is available for review by interested citizens at least 72 hours prior to the board meeting. The district also posts the agendas (notice) on the website but does not have a process for ensuring that the agenda (notice) is posted at least 72 hours prior to a board meeting. For example, the March 22 agenda was not posted as of the morning of March 21, 2011, less than the required 72 hours of prior posting required by policy.

Board Policy BE (LEGAL) requires that:

> Notice of a Board meeting shall be posted on a bulletin board at a place convenient to the public in the central administration office for at least 72 hours before the scheduled time of the meeting. That notice or a notice posted at another Board-designated place shall at all times be readily accessible to the public for at least 72 hours before the scheduled time of the meeting. *Texas Government Code 551.043(a),551.051.*

EXHIBIT 1-7
SUPERINTENDENT'S EVALUATION CYCLE
2011



SOURCE: Region 13, March 2011.

In addition, Policy BE (LEGAL) specifies that:

> If the District maintains an Internet Website, in addition to the other place at which notice is required to be posted, the Board must also concurrently post notice of a meeting on the Internet Site. *Texas Government Code 551.056*.

These policies ensure that citizens have access to district business and can make a decision to attend the meeting to observe this business or provide public comment according to Board Policy BED (LEGAL).

The district should post Board of Trustees meeting agendas in a timely manner to ensure adequate notification is provided to all interested parties. The superintendent should ensure that the Central Office administrative secretary, who is responsible for continuing to post the paper agenda on the front window of the administration building, is responsible for and confirms the posting of the agenda on the website to meet Board Policy BE (LEGAL). Following onsite work by the review team, district administrators indicated that the district had launched a new website which allows the Central Office administrative secretary, who has been assigned the task of posting the Board of Trustees meeting agenda a minimum of 72 hours prior to the scheduled meeting and posting the minutes and attachments following the meeting, to post the Board of Trustees meeting agendas on the website.

This recommendation can be implemented with existing resources.

BOARD OF TRUSTEES STANDARD OPERATING PROCEDURES (REC. 8)

The Board of Trustees lacks a procedure to ensure that member attendance is monitored, resulting in challenges to moving the district forward with all board members informed on the issues. A review of board minutes on the LISD website indicates that of the 18 meetings archived on the website, 14 provided minutes with a record of board member attendance. Of those 14 meetings, there were only three meetings with all board members present, one meeting with six members present, and eight meetings with five members present. Of the 14 meetings with less than a full board, one board member was absent eight times, or more than 50 percent of the time. **Exhibit 1–8** reflects the numbers of board members present at the meetings for which there are records on the website.

The Board of Trustees should develop standard operating procedures that include a procedure requiring all members to attend each board meeting unless extenuating circumstances exist. These procedures should be agreed upon by all board members. This procedure could include an agreement that when a board member is unable to fulfill this agreed-upon requirement, he/she must resign from the Board of Trustees.

The Natural Resources Management and Environment Department, in a publication entitled *Standard Operating Procedures*, defines a standard operating procedure (SOP) as a document that "describes the regularly recurring operations relevant" to an organization. It states that the purpose of a SOP is to carry out the operations of an organization correctly and consistently. The authors offer the following model for the development of SOPs:

- identify a person responsible for the project;
- draft the document;
- verify the document;
- authorize the document;
- implement the document;
- archive the document; and
- monitor the implementation of the procedures.

EXHIBIT 1-8
BOARD OF TRUSTEES MEMBER ATTENDANCE
SCHOOL YEAR 2010–11

DATE	MEMBERS PRESENT
February 15, 2011	5
January 18, 2011	5
January 14, 2011	Unavailable on website
December 14, 2010	Unavailable on website
December 7, 2010	5
November 4, 2010	6
October 19, 2010	5
September 21, 2010	5
September, 15, 2010	5
August 17, 2010	Unavailable on website
July 20, 2010	5
June 15, 2010	5
May 18, 2010	7
April 20, 2010	6
March 31, 2010	Unavailable on website
May 23, 2010	5
February 16, 2010	5
January 19, 2010	7

SOURCE: Lamesa ISD website, March 20, 2011.

Johnson City Independent School District Board of Trustees and superintendent worked with Region 13 to develop Board Standard Operating Procedures and refer to those procedures at each board meeting. In addition, the SOPs are used annually during the required new board member local orientation.

The superintendent should take the initiative for implementing a process to develop Board of Trustees SOPs. This process should use examples of other Board of Trustees SOPS to develop a set of standard operating procedures that include board member attendance at board meetings. Board members should authorize the document's preparation and agree to the procedures developed. The superintendent should ensure that the procedures are archived and provided to appropriate individuals. The board president should monitor board operations as they relate to the SOPs.

This recommendation can be implemented with existing resources.

COMMUNICATING BOARD OF TRUSTEES ACTIVITIES (REC. 9)

LISD lacks a consistent public information system to ensure the community has the opportunity to be informed about Board of Trustees meetings, the decisions made in board meetings, and to provide input at the meetings. Currently the local media (newspaper and radio) assists the district in communicating Board of Trustees activities to community. The district reported that the Lamesa Press Reporter provides information prior to and writes a follow-up article after each Board of Trustees meeting. The district also indicated that the superintendent conducts a radio report immediately following every Board of Trustees meeting providing an overview of the meeting.

Review of board policy, board agendas, and an observation of a board meeting by the review team indicated that the Board of Trustees, in accordance with Board Policy BED (LEGAL), accepts community input at board meetings. However, the review team found that board agendas do not include a public comment item that invites community members to bring issues to the Board of Trustees on a regular basis. Further, review of the board meeting webpage on the LISD website reflects inconsistencies in the posting of both agendas and minutes. Of the 18 board meetings held between January 2010 and February 2011, there are three instances of agendas not having been posted and four instances of minutes not being posted. Neither agendas nor minutes were made public for two meetings held during that time period.

The agenda for the meeting held March 22, 2011, for example, had not been posted as of Monday, March 21, 2011. Minutes from the meeting held February 15, 2011, were posted prior to having been approved at the board meeting held March 22, 2011. In addition, minutes for a Special Called Meeting on March 31, 2010, were approved at the April 20, 2010 meeting, but do not appear on the website. The agenda and minutes for another Special Called Meeting on August 15, 2010, were approved at a meeting on October 19, 2010, but do not appear on the website. Finally, the most recent agenda is provided in both English and Spanish; however, the minutes are in English only.

Exhibit 1–9 provides the dates of Board of Trustees meetings and the information posted for those meetings on the district's website.

LISD should develop an administrative procedure that helps to communicate Board of Trustees activities more effectively. The superintendent should coordinate the following activities:

- identify a staff member to be responsible for posting agendas and minutes on the website;
- train the staff member in the policies and procedures for posting and monitoring board agendas and minutes posted on the website;
- add an agenda item called "citizens to be heard" to provide community members consistent opportunities to address board members at regularly scheduled board meetings; and
- place this task on the job description and appraisal instrument of the person identified.

This recommendation can be implemented with existing resources.

EXHIBIT 1-9
WEBSITE ACCESS TO BOARD OF TRUSTEES AGENDAS AND MINUTES
SCHOOL YEAR 2010–11

DATE	AGENDA POSTED ON WEBSITE	MINUTES POSTED ON WEBSITE
3-22-11	Not posted	NA
2-15-11	Posted	Posted
1-18-11	Minutes posted as agenda	Not posted
1-14-11 (Special Meeting)	Posted	Not posted
12-14-10	Posted	Not posted
12-7-10 (Special Meeting)	Posted	Posted
11-4-10	Posted	Posted
10-19-10	Posted	Posted
9-21-10	Posted	Posted
9-15-10	Not posted	Not posted; minutes approved at October 19 meeting
8-17-10	Posted	Posted
7-20-10	Posted	Posted
6-15-10	Posted as 6-16	Posted
5-18-10	Posted	Posted
4-20-10	Posted	Posted
3-31-10	Not Posted	Not posted; minutes approved at April 20 meeting
3-23-10	Posted	Posted as 3-24
2-16-10	Posted	Posted
1-19-10	Posted	Posted

SOURCE: Lamesa ISD website, March 20, 2011.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 1: DISTRICT ORGANIZATION							
1. Create a proactive process for raising expectations for all students.	$0	$0	$0	$0	$0	$0	($4,700)
2. Review current reporting practices, district policies, and job descriptions to determine and articulate the most efficient reporting structure.	$0	$0	$0	$0	$0	$0	$0
3. Develop a three- to five-year comprehensive strategic plan to ensure the district is moving forward and addressing current and future community and student needs.	$0	$0	$0	$0	$0	$0	($10,000)
4. Establish a schedule for the development of district and campus plans for Board of Trustees approval prior to budgeting in July/August of each school year.	$0	$0	$0	$0	$0	$0	$0
5. Ensure all board members meet continuing education requirements.	$0	$0	$0	$0	$0	$0	$0
6. Develop a comprehensive superintendent evaluation process.	$0	$0	$0	$0	$0	$0	$0
7. Post Board of Trustees meeting agendas in a timely manner to ensure adequate notification is provided to all interested parties.	$0	$0	$0	$0	$0	$0	$0
8. Develop standard operating procedures for the Board of Trustees that includes a procedure requiring all members to attend each board meeting unless extenuating circumstances exist.	$0	$0	$0	$0	$0	$0	$0
9. Develop an administrative procedure that helps to communicate Board of Trustees activities more effectively.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 1	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**($14,700)**

CHAPTER 2

COMMUNITY INVOLVEMENT

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 2. COMMUNITY INVOLVEMENT

Involvement of the community in activities and partnerships that support and promote a school district are essential to dealing with the challenges and opportunities any school district faces. Similarly, parent involvement is an important part of student success. School districts and their surrounding communities are interdependent and their needs are often inseparable.

Lamesa, Texas, is the county seat of Dawson County, which covers just over 900 square miles in the South Plains area of Texas. Estimated county population in 2009 was 13,657, with an 8.9 percent decrease in population since 2000. The median household income for the county was $34,901 (2008 U.S. Census Bureau) and the percent of the population in poverty was 23.6 percent (2009 U.S. Census Bureau). Historically, agriculture and oil have been the mainstays of the economy.

Lamesa Independent School District (LISD) enjoys the benefit of strong support from business owners, community leaders, administrators, and teachers. However, the increasing number of students transferring from LISD schools to other area districts and the declining enrollment trend has raised concerns among district staff and community members. Additionally, the district's demographic base has changed over the last 15 years, with greater numbers of economically disadvantaged families with children attending LISD schools.

The district has been successful engaging community leaders in LISD activities as evidenced by a number of collaborative efforts with community agencies and the local police department. Despite these positive relationships, however, overall public perceptions of the district were reported to be mixed with uneven levels of parent involvement. While some staff reported that they see good turnout of parents and community members for social events such as the high school hot dog supper at the beginning of the year, booster club events, and elementary open houses, other LISD staff reported that some parents do not participate in school activities. Staff said that getting parents involved in working groups such as a Campus Improvement Team (CIT) was more difficult, partly because the teams meet at times when many parents are busy with work or child care, and partly because the meetings focus on organizational topics in which parents have little interest.

ACCOMPLISHMENTS

- LISD has strong partnerships with community leaders and local media (radio and newspaper).
- LISD has an effective parent notification system.

FINDINGS

- LISD does not have a strong, positive brand across the community.
- LISD has not found a way to consistently involve the growing numbers of economically disadvantaged students and parents.

RECOMMENDATIONS

- **Recommendation 10: Create a positive brand and public relations plan to enhance community and parent perceptions and involvement.**
- **Recommendation 11: Work with teachers and community leaders to better address the needs of the 74 percent of students who come from economically disadvantaged families.**

DETAILED ACCOMPLISHMENTS

RELATIONSHIP WITH COMMUNITY LEADERS AND LOCAL MEDIA

LISD has strong partnerships with community leaders and local media (radio and newspaper). District staff and community leaders identified by the district for interviews with the school review team talked about their common involvement in groups such as church, Kiwanis, Boys and Girls Club, and city festivities. The local Kiwanis Club paid for and built playgrounds at the two elementary schools so that all children in the community had access to playgrounds. The district pays the salaries of two of the four teachers at the Head Start program, which is funded and run by the West Texas Opportunity Center. One teacher characterized the district community relationship in this way: "Anything the kids need, just ask a community member, and you'll get it."

Staff also reported that the district and agencies have worked together effectively to solve problems such as student truancy. For example, at the request of district administration, the city passed a curfew that prohibits students from being on

the streets during the week. A night time curfew was put in place, and then a daytime curfew added. As noted by a city leader: "Kids who don't want to be in school have to be at home. [They] can't roam the streets." The district and Lamesa Police Department also collaborated to provide a school resource officer (SRO) for the schools. The officer was hired and paid by the district and trained as a member of the city police force. The city supplies a squad car for use by the officer.

The community has also been involved in planning for much-needed high school renovations. A committee of community leaders was organized to study the situation and make a recommendation to the Board of Trustees on whether it would be better to build a new school or renovate the existing structure. The committee recommended renovations, but the cost would still exceed the amount of the funds currently available to the district. Therefore, the Board of Trustees made the decision to hold the first bond election that most citizens can remember. Despite the recommendations of the committee, almost 60 percent of the voters rejected the $15 million bond issue in May 2011.

The district also has a good relationship between the district and the newspaper, the Lamesa Press Reporter, and local radio station, KPET. Staff and community members reported that the newspaper covers every board meeting. The radio station provides live coverage of major high school sporting events, including high school football, baseball, basketball, and volleyball. The station also reports school district information such as events open to the public and school lunch menus that have been published in the newspaper.

AUTOMATED PARENT COMMUNICATION SYSTEM

LISD has an effective parent notification system. The district uses a system called Skylert to reach parents with important information related to the district. In the past, telephone trees were used to convey information about important events like snow days. Now, Skyward automatically places a call and sends an e-mail to parents about not only emergencies like snow days, but to remind them of events such as school open house and report card issuance. Parents make choices about how they will be contacted and can sign up for e-mail notification, telephone notification, or both. This system also could be seen as an incentive for parents whose phone number changes to notify the district quickly. The district could also monitor to proactively collect new information for non-working numbers.

Skylert is fully integrated with the Skyward management system in use by the district. Parents interviewed by the school review team reported being very pleased with the notification system.

DETAILED FINDINGS

DISTRICT BRANDING (REC. 10)

LISD does not have a strong, positive brand across the community. Despite good relations with many community and business leaders, serious concerns in terms of overall public perceptions of the district and parent relationships have not been addressed. Further, the district has not been responsive to the changing needs of the families and the students it serves.

LISD is losing population, and district demographics are changing, with a high number of students coming from economically-disadvantaged families as shown in **Exhibit 2–1**. In school year 1994–95, the district reported an enrollment of 2,791 students, and in school year 2009–10, 1,924 students were enrolled. In school year 1994–95, 58 percent of enrolled students were economically disadvantaged, while in school year 2009–10, that number was nearly 74 percent.

While the county overall has seen a decrease in population, recent enrollment decreases in LISD reflect a growing number of student transfers from LISD to nearby smaller school districts. For school year 2010–11, district administrators reported that 273 students, or 12 percent of the total student body who still live within the boundaries of LISD, attend school in other districts as shown in **Exhibit 2–2**.

This issue is seen as serious by some taxpayers and staff, but not by others. One community member said: "If we're always focused on kids we lost, we can't focus on kids we have." However, the loss of Average Daily Attendance (ADA) funding, as well as the need to keep available seats for these students could be a financial burden to the district. A board member reported that the Board of Trustees has not had a public discussion of the issue at any of their board meetings.

When asked why students were transferring out of the district, community leaders and school staff reported that the reasons varied. Some characterized it as a "parental decision" and would not discuss the issue further. Others thought that it was an economic bias, referencing a different set of values between parents from low-income or middle- and high-

EXHIBIT 2–1
LAMESA ISD DEMOGRAPHIC HISTORY
SCHOOL YEARS 1994–95 TO 2009–10

		STUDENT GROUPS							
SCHOOL YEAR	TOTAL STUDENTS	AA	H	W	NA	A/PI	ED	LEP	AR
1994–95	2,791	5.3%	62.8%	31.9%	*	*	58.1%	14.9%	n/a
1995–96	2,626	5.3%	63.9%	30.7%	*	*	60.6%	15.0%	n/a
1996–97	2,598	5.5%	64.2%	30.3%	*	*	60.3%	13.9%	n/a
1997–98	2,578	4.9%	66.5%	28.5%	*	*	60.9%	14.0%	n/a
1998–99	2,550	4.5%	68.3%	27.1%	*	*	60.2%	12.9%	n/a
1999–2000	2,466	4.0%	68.5%	27.3%	*	*	61.4%	12.8%	n/a
2000–01	2,404	4.4%	69.1%	26.1%	*	0.4%	64.3%	11.2%	n/a
2001–02	2,259	4.1%	70.1%	25.6%	*	*	64.2%	10.8%	n/a
2002–03	2,153	4.5%	71.2%	24.2%	*	*	62.0%	8.2%	n/a
2003–04	2,104	5.1%	71.0%	23.5%	*	0.4%	66.3%	8.8%	n/a
2004–05	2,040	4.9%	71.4%	23.2%	*	0.4%	67.4%	8.1%	52.5%
2005–06	2,038	5.3%	71.5%	22.8%	*	0.2%	65.6%	7.5%	57.8%
2006–07	2,038	5.3%	72.4%	22.0%	*	0.2%	69.0%	5.7%	53.0%
2007–08	2,003	6.1%	71.6%	21.8%	0.2%	0.2%	70.9%	6.2%	51.2%
2008–09	1,942	6.0%	73.1%	20.5%	*	0.4%	67.5%	6.0%	50.5%
2009–10	1,924	5.9%	73.7%	19.5%	*	0.7%	74.2%	6.0%	58.3%

NOTES: *Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34CFR Part 99 and Texas Education Agency procedures OP 10-03. AA = African American; H = Hispanic; W = White; NA = Native American; A/P = Asian/Pacific Islander; ED = Economically Disadvantaged; LEP = Limited English Proficient; and AR = At risk.
SOURCE: Texas Education Agency, Academic Excellence Indicator System (AEIS) District Reports, school years 1994–95 to 2009–10.

EXHIBIT 2–2
LAMESA ISD STUDENT ENROLLMENT IN OTHER DISTRICTS
SCHOOL YEAR 2010–11

DISTRICT	NUMBER OF LISD STUDENTS ATTENDING THIS DISTRICT
Borden County ISD	35
Dawson ISD	78
Klondike ISD	108
O'Donnell ISD	43
Sands CISD	9
TOTAL	**273**

SOURCE: Provided to LISD by individual receiving districts, school year 2010–11.

income situations. This view was apparent in community member comments such as: "It's a clash of value systems" or "[We have a] lot of low income parents who don't care if their kids come to school or not." Still other interviewees stated that the number of transfers was related to academics and parents seeking a "private school" experience that is smaller with more rigor in the smaller neighboring districts.

It is an advantage for other districts to attract LISD students, as the districts can select which students to accept, and the new district receives the benefit of the ADA funding for those students who have transferred. It was reported that one neighboring district placed an ad in the Lamesa newspaper to recruit students. Anecdotal information gathered at Lamesa ISD supported the opinion that students who are not successful academically are not accepted or retained at neighboring districts.

The district should take action to identify and advertise the benefits of attending LISD schools. The district's strong relationship with local media could be used to a greater advantage in reaching a wider public in promoting the district's assets. Further, LISD's current website is not used to its full potential as an engagement and communication tool (e.g., enhancing community outreach, building awareness, providing important information to parents, and highlighting student and district accomplishments).

LISD should create a positive brand and public relations plan to enhance community and parent perceptions and

involvement. The district should start by directly addressing the financial impact of student transfers by conducting a financial analysis and discussing it publicly in a Board of Trustee meeting. The district should also take a proactive approach to publicizing the benefits of attending LISD. While the district has already started its Team Lamesa initiative to increase staff camaraderie and community beautification projects, school public relation organizations, such as the National School Public Relations Association and the Texas School Public Relations Association, could help develop a coherent plan for publicizing district goals, messaging, and accomplishments.

The district should also focus on its website as a communication and public relations tool. The website should expand on the parent resources section so that information for parents is easy to access. It should also highlight the positive happenings in the district including photos of students and events, such as successful student groups like the Business Professionals of America (BPA).The website should contain elements to drive traffic to the site that are timely and relevant such as legislative and board updates, podcasts of important community news, such as "Sports Highlights" or "Acts of Excellence Report." These podcasts could be delivered by students. The website might also include a short video about the district and why it is a great place similar to the video for recruiting teachers but aimed at a broader audience. Additionally, the website offers an opportunity to leverage an already positive relationship with local media. The district could work with press staff to develop press releases touting the good things that are happening. The press releases could then be circulated by both the print media and on the district website. The district could put a link to local media on their website. For example, Seminole Independent School District advertises following varsity sports on web radio and has a link to the local newspaper in their community section.

The superintendent should identify a staff member to serve in the public relations role. This recommendation assumes expenditures of approximately $350 per year for a national and state membership to a professional public relations association for one staff member. A professional membership for one staff member to the National School Public Relations Association is $250 per year and a professional membership for one staff member to the Texas School Public Relations Association is $100 per year or ($250 national membership + $100 state membership = $350 per year.)

ECONOMICALLY DISADVANTAGED STUDENT AND PARENT INVOLVEMENT (REC. 11)

LISD has not found a way to consistently involve the growing numbers of economically disadvantaged students and parents. Community members, parents, and district staff discussed the change in demographics within the LISD community. **Exhibit 2–3** summarizes the ethnicity and economic status of district students in school years 1990–91, 1994–95, and 2009–10. The exhibit shows that the percentage of students who are African American has stayed the same in the 16 years that the Texas Education Agency (TEA) has been reporting Academic Excellence Indicators. Hispanic students are the largest ethnic group, comprising approximately 63 percent of students in school year 1994–95 and 74 percent of students in school year 2009–10. White students comprised approximately 32 percent of students in school year 1994–95, and in school year 2009–10 represented 20 percent of total students.

While there has been some change in ethnic balance, the greater change has been in economic composition of the community. The percentage of district students who are economically disadvantaged has increased from approximately 56 percent of students in school year 1990–91 to 74 percent in school year 2009–10. Thus, in the 1990s, approximately two of every four students came from low-income

EXHIBIT 2–3
CHANGE IN LAMESA ISD STUDENT DEMOGRAPHICS
SCHOOL YEARS 1990–91 TO 2009–10

SCHOOL YEAR	AFRICAN AMERICAN PERCENTAGE (NUMBER)	HISPANIC PERCENTAGE (NUMBER)	WHITE PERCENTAGE (NUMBER)	OTHER ETHNICITY PERCENTAGE (NUMBER)	ECONOMICALLY DISADVANTAGED PERCENTAGE (NUMBER)
1990–91 (2,901)	5.3 (154)	60.9 (1,766)	33.6 (975)	0.2 (6)	55.9 (1,621)
1994–95 (2,830)	5.0 (141)	63.1 (1,786)	31.8 (899)	0.1 (4)	55.2 (1,562)
2009–10 (1,924)	5.9 (114)	73.7 (1,418)	19.5 (376)	0.9 (16)	74.2 (1,427)

SOURCE: Texas Education Agency, AEIS District Reports, school years 1990–91, 1994–95, and 2009–10.

backgrounds, whereas now three of every four students do. The shift has been slow, but currently nearly three quarters of LISD students are classified as economically disadvantaged. This shift reflects a change in the cultural background of the students, while the composition of the administrative and teaching staff has remained largely unchanged.

Research shows that parental involvement is an important part of student achievement. LISD staff reported that some parents do not participate in school activities. Different activities may be necessary in order for the district to successfully involve parents from low-income backgrounds, especially those from generational poverty. Research shows that there are ways to provide appropriate opportunities for involvement for students and parents coming from an economically disadvantaged background. This approach begins with an understanding of the range of perspectives represented in the district, including different motivators for learning. In order to engage parents, the district must find ways to reach the 75 percent of economically disadvantaged parents who may come from dissimilar backgrounds relative to teachers and administrators.

The district currently provides a number of opportunities for parents to be involved in the schools. For example, South Elementary, which provides services to students in Grades PreK–2, offers the following activities:

- family game night;
- family reading night;
- "Let's get moving" night;
- family concerts;
- "Cheers & Tears" for kindergarten parents;
- kindergarten round-up;
- book fair;
- "Make-overs for Moms;"
- "Designs with Dads;"
- Thanksgiving and Christmas meals;
- parent trainings (autism, behavior management, dyslexia, G/T, special education);
- parent book study (How to Have a New Student by Friday Every Thursday Evening);
- Texas Public Education Week;
- open house (two per year);
- parent conferences, early dismissal days (three times per year);
- Campus Improvement Team (CIT) meetings; and
- Student Assistance Team meetings.

However, staff reported that many low-income families did not participate in parent involvement activities. This suggests that LISD is in need of alternatives for attracting parents from low-income families to consider themselves members of the district community and increasing their level of participation in school activities.

LISD should work with teachers and community leaders to better address the needs of the 74 percent of students who come from economically disadvantaged families. The district should identify and work with community members, such as the school resource officer, migrant staff, board members, teachers from the community, and business owners with community ties to address the needs of low-income students and parents to increase their involvement in the schools. Efforts should consider and address common reasons for low parent participation, such as childcare, transportation, work schedules, language, and feeling valued and welcomed.

One way of creating a welcoming environment for low-income families is to make the school, and staff, as non-threatening as possible. This can be accomplished through frequent exposure, such as through offering adult classes and/or working with other community organizations to collaborate services. For example, a food or clothing pantry could be located at one of the schools which would increase parent familiarity with the campus. Teachers should also prioritize calling parents or sending information home to parents often with good news about their students, so that when a problem arises it is not the only time the parents and teacher talk. In addition, the district should conduct professional development for all staff on diversity. A book study for teachers in which they learn about common differences between students from poverty and middle- or high-income students could be another way of helping teachers understand the range of perspective in the community. This activity could be included as part of the larger recommendations around raising expectations discussed in the District Organization chapter of this report.

A successful example of parent outreach from a high-poverty district is the San Elizario Independent School District's Parent Involvement Plan. It guides the district's efforts to

involve parents and community members in the schools. This district established a parent advisory committee, created meaningful volunteer opportunities, and used parent liaisons to recruit volunteers. They also included workshops for parents to assist them in supporting their students with academic and social needs. LISD could engage a committee of parents representing the low-income community to create a plan that would emphasize the unique qualities of the district and the community and that would be mindful of the needs of the many students and parents from poverty.

Hidalgo Independent School District also serves a high low-income population; 90 percent of students are economically disadvantaged. In school year 2004–05, the district implemented a parental involvement program that included three levels of programming that led to greatly increased parental involvement. The strategies consisted of regular parental involvement activities, including speaker meetings on such topics as health and family services; campus parent centers designed to increase the ability of parents to provide educational support to their children; and parent academies that provided language classes, GED preparation, and college readiness classes.

Finally, the National Parental Information and Resource Coordination Center (PIRC) provides parent involvement technical assistance supporting management capacity, service delivery, and provides access to materials, including research-based, effective practices regarding parent training and parental involvement in support of student learning. A wealth of free information is available on their website at www.nationalpirc.org. This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 2: COMMUNITY INVOLVEMENT							
10. Create a positive brand and public relations plan to enhance community and parent perceptions and involvement.	($350)	($350)	($350)	($350)	($350)	($1,750)	$0
11. Work with teachers and community leaders to better address the needs of the 74 percent of students who come from economically disadvantaged families.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 2	**($350)**	**($350)**	**($350)**	**($350)**	**($350)**	**($1,750)**	**$0**

CHAPTER 3

EDUCATIONAL SERVICE DELIVERY

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 3. EDUCATIONAL SERVICE DELIVERY

Lamesa Independent School District (LISD) is comprised of five campuses: one elementary school serving grades PK–2, one elementary school servings grades 3–5, one middle school, one high school, and one alternative campus. As noted in the Community Involvement chapter of this report, the district has experienced a 5.6 percent decrease in enrollment in the past five years, with the number of students decreasing from 2,038 in school year 2005–06 to 1,924 in school year 2009–10.

LISD is a predominantly Hispanic district. In school year 2009–10, the LISD student population was 74 percent Hispanic, 20 percent White, and 6 percent African American. Approximately 74 percent of LISD's students were classified as economically disadvantaged, 58 percent were classified as at risk, and 6 percent were classified as Limited English Proficient (LEP).

LISD received an Academically Unacceptable rating for school year 2009–10 from the Texas Education Agency (TEA) due to Completion Rate I (students who gradulated or continued) for Hispanic students. During that school year, three campuses received an Academically Acceptable rating, one received an Academically Unacceptable rating (Lamesa High School), and the alternative campus received an alternative education accountability (AEA): Academically Acceptable rating.

Under the accountability provisions in the No Child Left Behind Act, all public school campuses, school districts, and the state are evaluated for Adequate Yearly Progress (AYP). The district's final 2010 AYP results indicated that LISD "Missed" AYP due to having too many students classified as special education taking the TAKS – Alt and/or TAKS – M versions of the Reading TAKS. All LISD campuses "Met" AYP.

Exhibit 3–1 shows the organization chart for LISD's educational services for school year 2010–11.

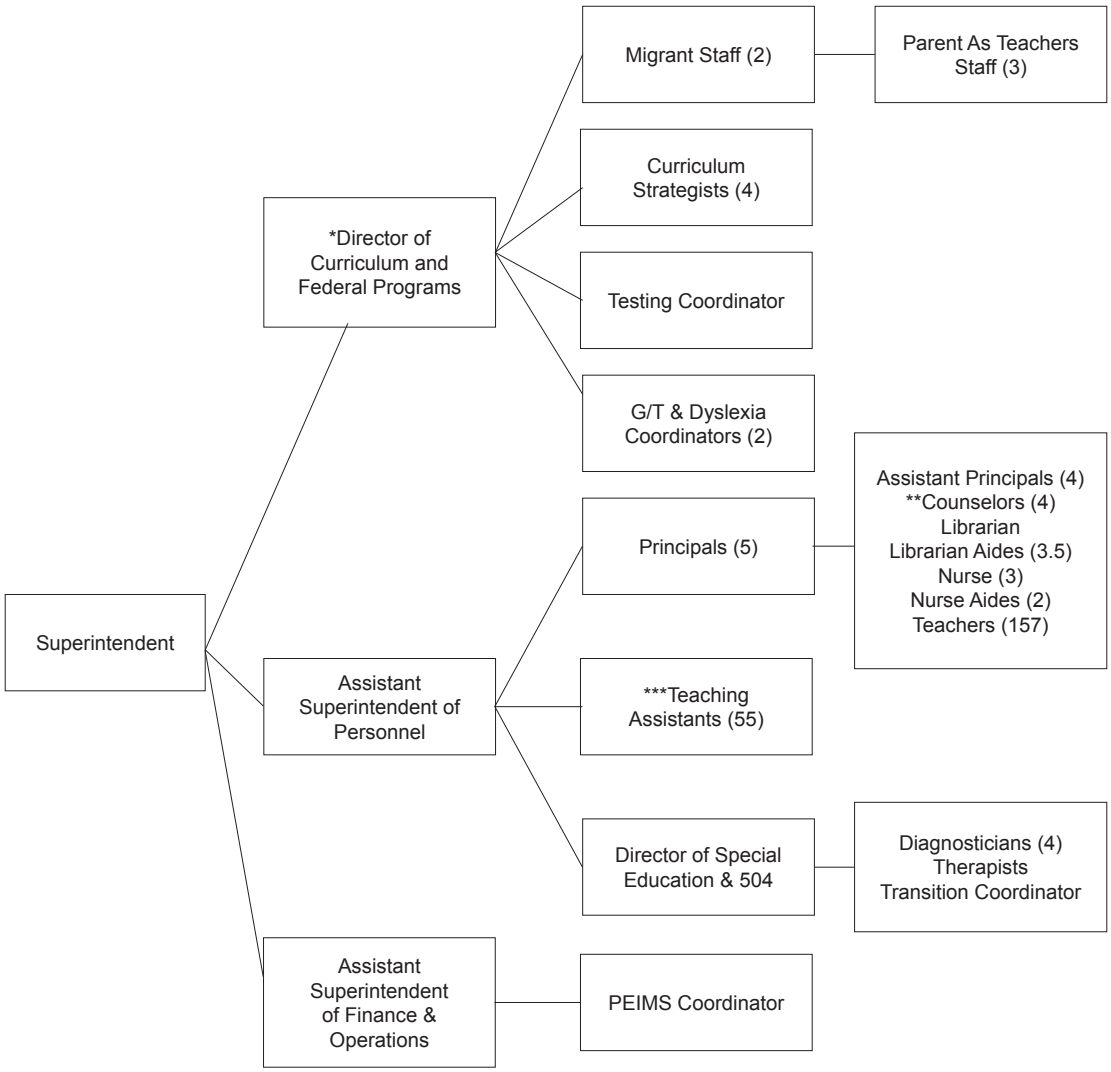
ACCOMPLISHMENTS

- LISD's migrant education program (MEP) is an example of the district serving a high-needs population well, using many strategies reflected in the migrant education best practice literature. The LISD MEP provides effective service delivery; uses outreach strategies that engender trusting family relationships and that involve, engage, and support parents; and has established community partnerships to meet student and family needs.
- LISD recently expanded its partnership with Howard College to offer more Career and Technical Education (CTE) programming, responding to both student and workforce needs.

FINDINGS

- LISD's educational programs lack sufficiently high expectations for student performance.
- LISD does not have a comprehensive curriculum and curriculum management system that adequately supports student learning.
- LISD has not adequately addressed the issue of student dropout. More students are dropping out of LISD compared to all students in the state and to various student population groups in the state.
- LISD does not provide adequate instructional programming targeting high performers and does not ensure college readiness.
- LISD has not evaluated or determined the effectiveness of the use of teaching assistants in the educational delivery process, and has not evaluated or defined the job expectations of teaching assistants.
- LISD does not have a systematic professional development plan in place to provide all teachers and teaching assistants with the skills they need to ensure that all students have opportunities to learn at their highest potential.
- LISD identifies a disproportionately low number of Limited English Proficient (LEP) students through home language surveys compared to U.S. Census Bureau estimates of the number of Spanish-dominant homes in Lamesa.
- LISD special education students do not perform at the state average for special education students or meet Performance-Based Monitoring Analysis System (PBMAS) standards. Also, special education students

EXHIBIT 3–1
LAMESA ISD EDUCATIONAL SERVICES ORGANIZATION CHART
SCHOOL YEAR 2010–11†



†The District does not offer a Bilingual/English as a second language (BIL/ESL) program due to low numbers.
*Responsibility for oversight of professional development is shared by the director of Curriculum and Federal Programs, assistant superintendent of Personnel, and principals.
**The high school assistant principal is also responsible for Career and Technical Education (CTE) oversight.
***The number of teachers and teaching assistants comes from the Academic Excellence Indicator System (AEIS) 2009-10 and may not include all teaching assistants.
SOURCE: Lamesa ISD Organization Chart, Educational Services, 2010–11.

are sent to discretionary placements at a rate much higher than the state rate or the district as a whole.

- The health and social support services LISD provides to its high population of economically disadvantaged students does not enable them to perform to the best of their abilities.

RECOMMENDATIONS

- **Recommendation 12: Ensure the Board of Trustees, Central Office staff, principals, assistant principals, teachers, teaching assistants, and other staff advocate success for all students. High expectations for student performance begin with leadership and extend to all areas of the district.**

- **Recommendation 13: Monitor the curriculum development and curriculum management adoption process to ensure key elements are successfully implemented and result in improved student learning.**
- **Recommendation 14: Research dropout recovery and prevention strategies and apply for Texas Education Agency (TEA) grants to implement proven programs that will increase the chances of completion for every student in LISD. LISD should also expand the Success Academy to more students.**
- **Recommendation 15: Improve the rigor and focus of LISD gifted and talented (G/T) and advanced academics offerings.**
- **Recommendation 16: Reexamine the practice of using teaching assistants instead of certified teachers in key areas.**
- **Recommendation 17: Implement a systematic and strategic districtwide professional development plan for all instructional staff that provides differentiated learning opportunities based on staff needs and student performance data.**
- **Recommendation 18: Articulate high expectations for all students and respect for cultural diversity; provide community awareness about the benefits of Bilingual (BIL)/English as a Second Language (ESL) programming and appropriate identification; implement a research-based BIL/ESL program; and provide a summer school program for ELLs entering kindergarten and first grade.**
- **Recommendation 19: Create a planning group to address the needs of LISD's special education students, especially in regard to teacher training, the use of teaching assistants, discipline, and inclusion model implementation fidelity.**
- **Recommendation 20: Implement Communities in Schools (CIS) to relieve the nurses, counselors, and teachers of social work functions and to help ensure that students identified as economically disadvantaged have access to all the supports they need for greater academic success.**

DETAILED ACCOMPLISHMENTS

MIGRANT EDUCATION PROGRAM

The LISD migrant education program (MEP) is an example of the district serving a high-needs population well, using many strategies reflected in the migrant education best practice literature. The LISD MEP provides effective service delivery; outreach strategies that engender trusting family relationships and that involve, engage, and support parents; and community partnerships to meet student and family needs.

Staff reported that the population of migrant workers in the district has been decreasing in recent years due to agricultural production (ginning) of cotton moving out of the area. The LISD migrant student population was 5 percent in school year 2009–10, down from 10 percent in school year 2003–04.

The district operates an independent district MEP (as opposed to a Shared Services Agreement through its regional education service center). The MEP is staffed by two coordinators with a long history in the district program (37 and 10 years) and three additional staff that provides home-based school readiness services and screenings for pre-school aged migrant children (from age 3 and up). At the high school level, two instructional aides review migrant student grades and records to support MEP progress monitoring. All migrant staff and instructional aides receive training through Regional Education Service Center XVII (Region 17).

Best practices identified in the literature in evidence in the district include the following:

- strategies and programming that reflect intentional knowledge of the particular needs of the community, families, and students served;
- coordinated data and information sharing systems and networks, partnerships with service providers, and personal relationships built on trust and caring; and
- adequate and appropriate staffing to provide the level of advocacy and individualized services migrant students require.

Identification and recruitment strategies used by LISD MEP staff include canvassing community locations frequented by migrant workers and their families, including work locations, hotels/housing typically used by migrant families when they are in the area, and other business/

organizations that commonly serve migrant families. The goal is to inform migrant families about MEP services, encourage and assist in school registration, and provide school readiness and referrals for other services. Additionally, LISD MEP staff conducts home visits of students who register and list their employment as agriculture and check rosters of each campus to identify already-enrolled students who are eligible for migrant services. These contacts with migrant families also provide an opportunity for MEP staff to assess family needs and provide referrals and/or coordinate district and community support services, such as medical/health, legal, transportation, childcare, and emergency food and housing assistance to help migrant families.

Early education home-based services are provided by the LISD MEP for migrant children from birth to age 3 and children aged 3-5 not participating in other programs such as HeadStart. The district currently uses the Parents As Teachers (PAT) program, which is a federally approved home visit model for high-risk families. The three trained MEP staff members serve approximately 20 families each and report that there is a waiting list for services. Staff visit their assigned families one day per week for one hour to provide parental training in home education activities aligned with the PAT curriculum and to conduct screenings for educational and health needs.

Elementary and secondary migrant instructional programming includes tutorials, school supplies, and supplemental programs to provide educational continuity while migrant students are out of the district. Specifically, the district provides the Summer Project SMART (Summer Migrants Access Resources through Technology). SMART is a national distance learning program designed to increase migrant student achievement by providing a high quality K–12 curriculum for use in classroom and home-based settings, as well as instruction, assessment, innovative uses of technology, professional development and parent involvement. Additional programming for migrant students at the high school level includes opportunities to take correspondence classes and help with academic testing fees, and college visits.

LISD's **Title I/Migrant Parent Advisory Council (PAC)** was reported by staff and migrant parents to be an active, positive activity with good participation. Title I, Part C Migrant Education Program rules require that programs be designed and conducted in consultation with the PAC. The LISD PAC meets a minimum of four times per year but often meets monthly. MEP staff provides training to parent participants designed to help them recommend, implement, and evaluate services for their children. PAC members are also encouraged to attend, and the MEP partially funds parent participation, regional and state PAC training, and migrant conferences. Migrant parents reported that while many parents are otherwise intimidated by school office staff, the PAC provides a way they can comfortably interact with school staff and gain information about educational policy and opportunities.

Referrals and advocacy to access community services are additional key services provided by the district MEP that are facilitated during initial identification and recruitment contacts, regular home visits by MEP staff providing early education services and screening, in-school service delivery, and PAC meetings. Through these contacts, staff members have multiple opportunities to assess group and individual migrant family needs. Staff reports that migrant parents regularly seek MEP staff support when they have a need or encounter obstacles to service delivery. One example provided by district staff involved a MEP staff member appearing in court and providing the necessary "proof of attendance" in order for a migrant family to receive food stamps. The MEP also supports appropriate medical care provided through the district nurse and some limited financial assistance for needs such as doctor visits or prescriptions for migrant students. Recommendations for these services can be made by parents, teachers, aides, or anyone with an interest in the welfare of the student.

CAREER AND TECHNICAL EDUCATION (CTE)

LISD recently expanded its partnership with Howard College to offer more CTE programming in response to both student and workforce needs. The district currently offers 24 CTE dual enrollment, commonly referred to as Tech Prep courses, 21 of which are offered through state or local credit articulation agreements. Tech Prep courses are CTE courses that offer post-secondary credit opportunities governed through articulation agreements governed by school districts and community and/or technical colleges. Courses are available in the following areas: Advanced Animation, Agriculture, Landscape Design, Welding, Architecture/Construction, Business Management, Career Prep, Child Development, Practicum in Education, Fashion Marketing, Human Services, Interior Design, and Family/Financial/Nutrition. Staff reported that agricultural sciences, computer skills, family and consumer science, and welding were areas of existing strength. CTE programming is coordinated by the high school counselor working with CTE teachers.

The district supports economically disadvantaged student participation in dual enrollment courses, covering 60 percent of tuition and fees for students receiving reduced lunches and 80 percent for those receiving free lunches.

The district has established a strong partnership with Howard College (which has a local campus and a larger campus in Big Spring) to provide enhanced, workforce-ready CTE opportunities; to recruit and engage students in career education; and to coordinate programming aligned with student interests and goals. This partnership represents an extensive outreach effort and investment by the district to support career-oriented training and education.

A first goal of the partnership is to develop programming so that students can take Tech Prep courses for Level I certification, facilitating an easy transition after graduation into continuing education and the workforce. This effort could also allow students in some training areas to take college credits toward a Level II or associate's degree while still in high school and then move directly into jobs after graduation. The district recently purchased a 14-seat bus to provide transportation for students taking these advanced CTE dual enrollment courses offered through its partnership with Howard College (Big Spring) for Level I certification. The district plans to offer transportation for both morning and afternoon sessions if needed. The bus is also outfitted with laptops and mobile, wireless technology to allow students to take for-credit online courses not offered through the district or Howard College during the 45-minute bus ride to the Howard College campus.

The district is also working in collaboration with Howard College CTE staff on a number of initiatives to engage students in career planning and to develop programming aligned with student interests. In spring 2011, Howard College CTE staff planned to conduct several outreach activities, including a campus visit to meet with students in Grades 10 and 11 to discuss existing and potential opportunities at the campus. The district was going to bus all Grade 10 students (and interested students in Grades 11 and 12) to the Big Spring campus for a college showcase of CTE programs. Following these activities, the district and Howard College CTE staff planned to develop and administer a student survey to gather information about student interest in CTE programming areas. The district and Howard College then planned to use survey data to review current staffing patterns and design and develop programming to expand and enhance CTE offerings in areas of interest. Concurrently, district staff members were meeting with area business representatives to discuss workforce needs. Staff also reported that a career exploration course was being investigated for implementation at the middle school level.

Staff reported that these activities will help Lamesa High School to revisit an existing plan for career pathways that had been developed but had not been implemented. The goal is in the next three years to create multiple pathways with a full sequence of courses associated with each pathway. Staff anticipated that the student survey data would likely indicate initial targeted development of pathways related to welding, medical/health, and criminal justice.

In addition, Lamesa High School is home to two long-standing and dynamic CTE student organizations, the Business Professionals of America (BPA) and the Family, Career and Community Leaders of America (FCCLA). These organizations have generated a high level of student interest and participation in the district. Staff reported that a cross section of LISD students participated in the clubs and said that even "marginal" students who were not typically involved in academic or extracurricular groups or clubs have been highly successful in these organizations, participating in state-level activities and competitions. As part of CTE program enhancements, the high school planned to promote student involvement in the BPA and FCCLA through brochures distributed at high school registration, student-manned booths at presentations for students in Grade 8 of high school clubs and organizations, and teacher encouragement.

The planned enhancements to the LISD CTE program reflect best practices identified by AchieveTexas, an initiative of the Texas Education Agency's CTE unit, including the following:

- implementing career clusters based on student interests and career goals;
- organizing learning around career clusters, programs of study, or career fields;
- spanning all grade levels, including: career exploration opportunities for middle school students and activities to help high school students select secondary and postsecondary studies with consideration to personal career goals;
- enhancing guidance, including: credit options that enable students to take part in advanced technical credit or dual-credit courses and coordinated and

aligned articulation agreements that support student acquisition of credits;

- building seamless connections, including innovative programs that allow students to earn college credits in high school;
- establishing extended learning opportunities, including participation in Career and Technical Student Organizations (CTSO) that are aligned with career clusters of programs of study; and
- building strong partnerships, including both formal and informal partnerships and increased quantity and quality of partnerships.

DETAILED FINDINGS

HIGH EXPECTATIONS FOR STUDENT PERFORMANCE (REC. 12)

LISD's educational programs lack suffciently high expectations for student performance. Students in LISD exhibit a wide range of performance. In general, overall district performance is below state and regional averages. In school year 2009–10, 61 percent of LISD students passed all TAKS tests while 75 percent of students in Region 17 and 77 percent of students statewide passed all tests.

Looking across content areas, performance of LISD African American and Hispanic students was consistently below state averages. **Exhibit 3–2** shows TAKS Met 2010 Standard (Sum of All Grades Tested All Tests).

The numbers in bold in **Exhibit 3–2** and the exhibits that follow display the areas in which LISD students and student groups performed below comparison groups. Though White students performed above the state average in all subjects of the TAKS, only in social studies did LISD African American students meet the state average, and LISD Hispanic students did not meet or exceed state averages in any subject area. Differences in performance are most striking in mathematics and science with African American and Hispanic students performing substantially lower than White students in the district, state and regional averages.

Differences in LISD performance are more profound when performances of student groups are compared to state average student groups. **Exhibit 3–3** illustrates how LISD African American, Hispanic, and White students performed compared to the state averages of the African American, Hispanic, and White student groups.

Fifty-three percent of LISD African American students passed all tests as compared to 77 percent of African American students statewide. Fifty-four percent of LISD Hispanic students passed all tests compared to 71 percent of all Hispanic students statewide. Eighty-five percent of LISD White students passed all tests compared to 87 percent statewide. With the exception of African American student performance in social studies, performance of LISD African American and Hispanic student groups did not approach the state averages for those populations. LISD White students were within two percentage points of meeting the state average, except in writing and science where they met the state average.

The LISD student groups who are identified as special education, economically disadvantaged, limited English proficient (LEP), and at-risk also perform below state averages for their groups. **Exhibit 3–4** shows the differences in performance in all tests between the state averages for those student groups as compared to the same LISD student groups.

EXHIBIT 3–2
TAKS PERFORMANCE BY STATE, REGION, DISTRICT, AND DISTRICT STUDENT GROUPS
SCHOOL YEAR 2009–10

SUBJECT	STATE	REGION	LISD OVERALL	LISD AFRICAN AMERICAN	LISD HISPANIC	LISD WHITE
Reading/ELA	90%	90%	**85%**	**83%**	**82%**	95%
Mathematics	84%	82%	**70%**	**64%**	**65%**	89%
Writing	93%	93%	**86%**	**81%**	**84%**	96%
Science	83%	82%	**73%**	**58%**	**67%**	92%
Soc Studies	95%	95%	**92%**	95%	**90%**	96%
All Tests	77%	75%	**61%**	**53%**	**54%**	85%

NOTE: The numbers in bold show the areas in which LISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, Academic Excellence Indicator System (AEIS) district and state reports, 2009–10.

EXHIBIT 3–3
TAKS PERFORMANCE BY STATE AND DISTRICT STUDENT GROUPS
SCHOOL YEAR 2009–10

SUBJECT	STATE AFRICAN AMERICAN	LISD AFRICAN AMERICAN	STATE HISPANIC	LISD HISPANIC	STATE WHITE	LISD WHITE
Reading/ELA	87%	**83%**	87%	**82%**	96%	**95%**
Mathematics	84%	**64%**	81%	**65%**	91%	**89%**
Writing	91%	**81%**	92%	**84%**	96%	96%
Science	75%	**58%**	78%	**67%**	92%	92%
Soc Studies	93%	95%	94%	**90%**	97%	**96%**
All Tests	77%	**53%**	71%	**54%**	87%	**85%**

NOTE: The numbers in bold show the areas in which LISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, AEIS state and district reports, 2009–10.

EXHIBIT 3–4
TAKS PERFORMANCE BY STATE AND DISTRICT STUDENT GROUPS
SCHOOL YEAR 2009–10

	SPECIAL EDUCATION	ECONOMICALLY DISADVANTAGED	LIMITED ENGLISH PROFICIENT	AT RISK
State	43%	69%	58%	57%
LISD	**26%**	**54%**	**38%**	**46%**

NOTE: The numbers in bold show the areas in which LISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, AEIS state and district reports, 2009–10.

In terms of its highest performing students, LISD again does not approach state or regional averages. **Exhibit 3–5** displays TAKS Commended Performance (sum of all grades tested), which will be included in the 2011 accountability ratings.

EXHIBIT 3–5
TAKS COMMENDED PERFORMANCE BY STATE, REGION, AND DISTRICT
SCHOOL YEAR 2009–10

SUBJECT	STATE	REGION	LISD
Reading/ELA	33%	31%	**20%**
Mathematics	29%	25%	**13%**

NOTE: The numbers in bold show the areas in which LISD students performed below comparison groups.
SOURCE: Texas Education Agency, AEIS state and district reports, 2009–10.

On the AEIS College Readiness Indicators, such as advanced course/dual enrollment completion, recommended and distinguished plan graduates, Advanced Placement (AP)/ International Baccalaureate (IB) results, Texas Success Initiative (TSI) Higher Education Readiness Component, Scholastic Assessment Test (SAT) results, and College-Ready Graduates, LISD students do not approach the state average. The only indicator on which LISD students approach the state average is in American College Test (ACT) scores where the state average is 20.5, and the LISD average is 19.5.

The district has taken a number of steps to address these achievement gaps:

- According to the superintendent, the district has increased the percentage of Hispanic teachers to better reflect the population. Though 72 percent of the population is Hispanic, nine years ago, 10 to 11 percent of the teachers were Hispanic. The superintendent reports that percentage is higher now. AEIS reports indicate that in school year 2009–10, 17 percent of teachers were Hispanic, up from 11 percent in school year 1999–2000.
- The superintendent said the district has recognized the need for some experienced teachers to refocus on "the students we have now." Thus, hiring has refocused on identifying potential teachers who have energy and experience to serve high-needs students. In the superintendent's last year as assistant superintendent of Personnel, the district replaced 44 of 160 staff members. New teachers come to LISD through its representation at eight job fairs per year, though 50 percent of new teachers are word-of-mouth recommendations.
- LISD is beginning a new curriculum development process.

- LISD opened the Success Academy to help students who were behind in their credits and who had work and family responsibilities that prevented them from attending school all day.
- Student Assistance Teams (SATs) and Response to Intervention (RTI) strategies have decreased referrals to special education. Special education numbers have declined from almost 13 percent in school year 2008–09 to about 11 percent in school year 2009–10.
- Since the current superintendent has been in place (three years), he has made concerted efforts to be accepted by the Hispanic community, to change the attitude that "kids can't learn," and to raise academic standards such as beginning to teach science in grades 1–3.

However, despite these efforts, numerous comments made during the onsite review by LISD administrative and teaching staff indicated a lack of consistent high expectations for students in the district. Examples of comments included the following:

- "The good families are going to smaller schools."
- "I don't really see a change in kids. Names change. Kids are going to fill all the slots."
- [The district has a] "group of high achievers with involved parents. Many kids come from no-expectation homes. Parents and kids don't exist for each other. Parents transfer kids because they don't share the same values."
- "Upper class families have left the district because of the large population of Hispanics who they feel are holding their kids back."
- "Some kids have been selected to be on the 'fast track'."
- "Counseling should apply to all students across the board."

Despite current efforts, the comments illustrate some of the attitudes that exist toward student ability in the district. If unequal or low expectations are allowed to continue to exist, it appears likely that the district's achievement gap between student groups will continue or even increase.

Ensuring the Board of Trustees, Central Office staff, principals, assistant principals, teachers, teaching assistants, and other staff advocate success for all students is a top priority for the district. High expectations begin with leadership and extend to all areas of the district.

LISD should consider participating in a P–16 Council to improve student performance for all student groups. Many districts across the state and country have become involved in P–16 Councils designed to close the achievement gaps in their communities. P–16-Texas is sponsored by the Texas Higher Education Coordinating Board and the Texas Education Agency. Some of the goals of P–16 systems are to close achievement gaps through providing early learning, smoothing school-level transitions, improving college readiness, and improving school/community relations.

P–16 systems advocate for high expectations for all students and promote academic success so that students will succeed in post-secondary education and in the workforce. P–16 systems are designed to improve student achievement by getting children off to a good start, raising academic standards, conducting appropriate assessments, improving teacher quality, and generally smoothing student transitions from one level of learning to the next.

Getting involved with a P–16 initiative will provide LISD with a road map and a support system that is already in place and designed for districts with similar needs who are working to improve outcomes for all students, from the lowest to highest performers. Though 40 local councils exist statewide, new ones are anticipated for Lubbock and Odessa in 2011. Additional resources for creating a college-going culture are available from Texas GEAR UP, an initiative of the Texas Education Agency (TEA). With the goal of increasing "early college awareness and readiness in traditionally underrepresented groups," Texas GEAR UP provides a rich source of resources, including materials for first generation college goers and for Spanish-speaking parents. There are no costs for P–16 involvement or for individual copies of GEAR UP materials.

This recommendation can be implemented with existing resources.

CURRICULUM DEVELOPMENT (REC. 13)

LISD does not have a comprehensive curriculum and curriculum management system that adequately supports student learning. LISD began the curriculum development process and adoption of a curriculum management tool, but both are incomplete. In 2005, due to mediocre student achievement in all areas, the district requested a curriculum audit through the Texas Association of School Administrators

(TASA) Texas Curriculum Management Audit Center. Several findings resulted from the audit, including the need to develop a curriculum management plan and a systematic approach to curriculum monitoring through a structured walk-through process.

In addition to audit findings, the district also recognized an over-reliance on a program- and textbook-driven curriculum that was not sufficiently addressing student learning needs. Teachers relied on state-adopted textbooks to provide sufficient coverage of the TEKS. The district used the Madeline Hunter format for developing specific lesson plans. Additionally, the district adapted a generic, flexible commercial online database for storing lesson plans. The district was interested in developing a more specific curriculum and managing it through a more robust online system.

To address curriculum development, LISD recently adopted the Kilgo research-based approach to curriculum development that specifies the Texas Essential Knowledge and Skills (TEKS) through an in-depth understanding of associated Student Expectations (SEs). The Kilgo model provides scope and sequence documents in reading/English language arts (ELA), mathematics, science, and social studies for Grades K–12. It also provides a specific lesson plan format. Administrators and curriculum specialists from each campus have attended Kilgo trainings on data-driven decision-making and lesson development. These staff redelivered trainings to all staff, and the district plans to continue to send teachers to trainings.

To address curriculum management, district administrators, including the director of Curriculum and Federal Programs, previewed a beta curriculum management system produced by Seawinn, Inc., SEACLASS. The system is advertised to include units and lessons that were developed using the Understanding by Design Framework developed by Grant Wiggins and Jay McTighe and the Rigor and Relevance Framework designed by Dr. Bill Daggett. It also incorporates the use of the Response to Intervention model. System developers also advertise lessons based on the externally developed Kilgo model. The district administration was impressed by the system and contracted with the vendor for school year 2010–11.

District contract documents with Seawinn, Inc. state the district has contracted $24,015 for the first year and $10,015 for years two and three, for a total of $44,045 over three years for a curriculum management tool that includes Kilgo lessons. The curriculum and curriculum system were not delivered at the time of the onsite review in February 2011. The contract is unexecuted and dated February 2010. It is also unclear if the product will include Kilgo lessons. The contract documents refer to a scope and sequence but not an actual lesson bank. Therefore, LISD teachers are investing in creating Kilgo-based lessons in an alternative online format that may require reentry if and when the curriculum system becomes operational.

For lesson development, LISD has provided one day per six weeks for teachers. Based on the Legislative Budget Board's Texas State Government Effectiveness and Efficiency Report on School District Curriculum Management Systems (2009), most districts invest substantially more time and effort into this process. Typically, districts pay teachers to develop curriculum over the summer with updates developed each summer thereafter.

Based on a delayed implementation of the curriculum system, in spring 2011, the district proceeded with developing lessons using the Kilgo model where each campus identifies five SEs in each grade level and subject area for teaching emphasis and then develops lesson plans using the Kilgo format for those specific SEs.

A review of sample Algebra I lesson plans on linear regression using the prior lesson plan format compared to the current Kilgo format indicated the Kilgo format showed alignment with the district's intention to focus on SEs. The Kilgo lesson plan provided more emphasis on ensuring that students understand the skills associated with the SE. Additionally, the lesson plan using the old format relied on a textbook as primary teacher and student resources. It was unclear from the old lesson plan what the nature of the student activity would be other than completing a book assignment. The Kilgo lesson format included an interactive student activity as the primary resource. Both formats included the state's English Language Proficiency Standards (ELPS). Neither described technology applications or differentiation strategies.

As identified through the 2005 audit process, monitoring of curriculum implementation was needed. The former district superintendent conducted a book study with the administrative team using Carolyn Downey's *Three-minute Classroom Walk-through* to provide a systematic approach to curriculum monitoring. The book study was considered a success and formal walk-through training was provided to district and campus administrators. However, many of the

staff members involved are no longer at the district, and therefore this institutional knowledge is largely gone. The middle school administrative staff did describe a comprehensive walk-through process. The process requires that the site-based curriculum specialists and administrators review lesson plans and attend bi-weekly department meetings to present examples and discuss general themes and patterns from the lesson plans. These staff members also work with teachers in developing lesson plans. The process was described by campus staff as very collaborative and useful. Then two days each week, the principal, assistant principal, and curriculum specialist select a class period and conduct brief walk-throughs. The focus of the walk-through changes and may include emphasis on ELPS one day and a specific instructional strategy another. This group then meets to discuss observed curricular and instructional consistency across classes. This process also includes sharing feedback at department meetings and scheduling both formal and informal times to provide feedback to observed teachers. Again, campus staff described the process as highly collaborative. However, there was no indication of a districtwide monitoring process or implementation consistency across campuses.

Without a comprehensive curriculum and curriculum system, including monitoring, teachers lack a clear understanding of the district's approach to curriculum and curriculum delivery. Additionally, inconsistencies in content and gaps in content knowledge result from incomplete curriculum systems ultimately impacting student learning.

The district should monitor the curriculum development and curriculum system adoption process to ensure key elements are successfully implemented and result in improved student learning. During the development and adoption phase, the district should consider best practice industry standards that include: a needs assessment, alignment of curriculum with TEKS (including ELPS and Technology Applications), vertical and horizontal alignment documents, scope and sequence documents, exemplar lessons, aligned benchmark tests, monitoring process, and curriculum review process. Implementation steps related to each area follow.

- A **needs assessment** should continue to address SEs where more focused instruction is required. Other indicators beyond TAKS should include college readiness. The needs assessment should also consider lack of vertical alignment between grade levels that result in gaps in student knowledge. It could also include districtwide walk-throughs to measure curriculum and instructional consistency. Other needs assessment activities include assessing staff satisfaction through surveys and informal meetings.
- The **alignment of the curriculum with TEKS** should continue to leverage the Kilgo model emphasis on providing specificity to the TEKS. Additionally, all curriculum documents should specifically embed the ELPS and the Technology Applications TEKS throughout.
- **Vertical and horizontal alignment** should be articulated within and across grade levels and documented in alignment guides to eliminate gaps in student knowledge. Guides should organize grades and subjects together. Using Grade 3–6 mathematics as an example, the guides should identify how TEKS Student Knowledge statements and SEs spiral across grade levels so teachers know what to emphasize in which grade level. Additionally, the guides should include clarifiers that demonstrate different emphasis at each grade level.
- **Scope and Sequence** documents are provided through the Kilgo curriculum and include an overview of bundled objectives for a particular course or grade level, recommended order of presentation, and recommended amount of time for instruction. Additionally, the scope and sequence should identify "Power Standards" that have been identified as critical to student learning.
- **Exemplar Lessons**, while possibly provided by Seawinn, Inc., will still require a substantial time investment and should be prioritized by the needs assessment identifying subjects, such as mathematics, that are critical to student achievement. Grade-level teams should be given time in the summer to meet and collaboratively develop lessons aligned with the Scope and Sequence documents in each subject area. Additionally, development teams should include a process for involving other curriculum specialists from the areas of advanced academics, technology, special education, as well as BIL/ESL, to ensure lessons provide sufficient differentiation.
- **Aligned benchmark** tests should be obtained since there are limited human resources in the district to develop them internally, if they are not included with Seawinn, Inc. In school year 2010–11, the district uses the Measures of Academic Progress

(MAP)® computerized adaptive assessments developed by the Northwest Evaluation Association. While the NEA provides some evidence of alignment between the MAPs and TAKS, the Texas alignment study the MAPs are based on, use data from Plano Independent School District (PISD) where between 2 and 7 percent of students "did not meet" the standard on reading TAKS. PISD passing rates are not representative of the state as a whole, or of LISD. LISD should consider accessing the WebCCAT bank of TEKS-aligned benchmark test items through Region 17. Other options for obtaining TEKS-aligned benchmarks are the CCAP system offered through Regional Education Service Center IV (Region 4) or working with larger area districts to share benchmark tests and adapt to the LISD-developed curriculum. Benchmark testing should be given careful consideration to ensure it is effective and does not take away from instructional time. Therefore, benchmarks must be aligned to the TEKS and the curriculum, be in TAKS format, and reflect TAKS rigor. Additionally, teachers should receive user-friendly data to allow for timely instructional and curricular modifications.

- **Implementation support and training** is essential to ensuring staff is familiar with new content and processes, can easily access information, and understands expectations. The district should provide training each six weeks on an identified curriculum topic for staff.
- **Curriculum monitoring** should be standardized across the district with clear expectations for administrators and curriculum specialists and teacher feedback. The district should consider expanding the middle school curriculum monitoring model districtwide. This could include using the Seawinn, Inc. Curriculum Management System or another online system to centrally store lesson plans so that principals and district administrators have access to them. This approach serves two purposes. One, it would make the process of review and feedback more efficient by allowing principals or other reviewers to respond electronically. Lesson plans would be available prior to classroom observations, providing a context for what should be occurring in the observed class. Two, the district should implement a systematic approach to classroom observations. This should include providing in-depth training in structured walk-throughs, such as the training provided in 2006 since there has been considerable staff turnover since then; defining minimum numbers of walk-throughs to be conducted during specific timeframes; and defining a specific feedback process so teachers participate in formative instructional and curricular conversations.

  Results from classroom observations should also be linked to professional development opportunities, when appropriate, so that information systematically collected from observations is used to improve curriculum delivery and instructional strategies. Providing a formal and systematic monitoring plan allows campuses and the district to adequately monitor curriculum delivery, while also providing validity and reliability to the process. These strategies also will allow the results of monitoring to guide adjustments in both curriculum content and instructional delivery.
- **Curriculum review and modification** efforts should be regularly scheduled and led by the director of Curriculum and Federal Programs to provide a unifying structure and ensure efforts, materials, and resources are coordinated. Curriculum reviews and modifications should be systematic and driven by analysis of student achievement data indicating weaknesses in instruction. Specific writers or teams of writers should be given time and support during the summer to address identified areas of weakness. Curriculum revisions should be monitored and checked by the director of Curriculum and Federal Programs to ensure high quality and consistency.

As this description suggests, creating a comprehensive curriculum is an enormous undertaking. Adequate resources, such as time and money, are a concern when internally developing all the curriculum guides and lessons for each grade level and subject area that make a comprehensive curriculum. Based on previous Legislative Budget Board (LBB) analyses of curriculum development costs, very few small districts are able to successfully develop a comprehensive vertically aligned curriculum with aligned benchmarks and maintain updates efficiently.

Exhibit 3–6 provides an overview of costs associated with purchasing curriculum management systems and/or developing curriculum internally based on a review of five districts.

In the LBB report, initial purchases of curriculum management systems ranged from over $90,000 to $13,000 and from per-student costs from $13.19 to $2.84. Initial curriculum development was more difficult to measure because it either occurred over extended periods of time or was embedded in curriculum management costs, such as with CSCOPE. However, based on ongoing annual curriculum development costs (which would be a conservative estimate of initial development process), the average cost was $31,304. Initial training costs ranged from over $6.00 to under $1.00 per student. Ongoing annual costs associated with maintaining the curriculum management systems ranged from $13.67 to under $0.58 per student. Ongoing annual curriculum development or maintenance costs ranged from $4.88 to under $0.70 per student. Ongoing annual training costs ranged from $8.67 to $2.24 per student.

The curriculum personnel category only includes salaries for the chief instructional officer and directors of curriculum and subject-area specialist/coordinators (for each of the four core areas). To calculate consistent salaries across sites, personnel were assigned to one of these three positions by reviewing district-provided organization charts and job descriptions and comparing these duties and responsibilities to position detail summaries from the TASB/TASA *Salaries and Benefits in Texas Public Schools 2006–07 Administrative and Professional Report*. The report only provides salary information for three levels of positions, chief instructional officer, directors of curriculum, and subject-area specialist/coordinators. If a district staffed positions in these categories or equivalent categories, salaries were assigned using the median value provided for each title by the size of the district. The assumption was made that positions were staffed for a full fiscal year across all sites.

LISD may want to reevaluate its contract with Seawinn, Inc., including the district's existing contractual obligation of $44,045, to ensure it will meet district needs efficiently considering significant curriculum development still needs to occur. Based on other district estimates, a conservative estimate of costs is $30,000. LISD could also possibly consider a curriculum product that includes a management system, alignment documents, benchmarks, and a lesson bank with embedded ELPS and technology applications across grade levels and subject areas. The district could then invest its resources in adapting that existing product to better meet district needs and the Kilgo process given the expense and time of internally developing a comprehensive curriculum.

EXHIBIT 3–6
INITIAL AND ONGOING CURRICULUM MANAGEMENT AND DEVELOPMENT COSTS
2009

			INITIAL COST			ONGOING ANNUAL COST			
DISTRICT	SIZE	CURRICULUM MANAGEMENT PRODUCTS	CURRICULUM MANAGEMENT SYSTEMS [COST PER STUDENT]	CURRICULUM DEVELOPMENT	TRAINING	CURRICULUM MANAGEMENT SYSTEM	CURRICULUM DEVELOPMENT	TRAINING	CURRICULUM PERSONNEL
District 1	15,329	Edusoft & Eduphoria	$55,440 (Edusoft) $38,174 (Eduphoria) [$6.11]	Over a 10-year period	$11,500 (Edusoft) $3,000 (Eduphoria) [$0.95]	$54,646 (Edusoft) $20,416 (Eduphoria) [$4.90]	$32,045 [$2.09]	$132,918 [$8.67]	$623,954
District 2	14,827	TAKS Stream	$42,075 [$2.84]	$81,226 [$5.48]	$44,697 [$3.01]	$45,825 [$3.09]	$72,321 [$4.88]	$86,370 [$5.83]	$449,464
District 3	10,358	CSCOPE	$68,500 [$6.61]	Embedded in CSCOPE cost	$44,800 [$4.33]	$6,000 [$0.58]	$7,200 [$0.70]	$26,000 [$2.51]	$339,960
District 4	4,636	Pearson Benchmarks & Information (Internal curriculum)	$61,149 [$13.19]	Over a 10-year period	NA	$63,352 [$13.67]	$13,650 [$2.94]	NA	$113,340
District 5	1,850	CSCOPE	$13,000 [$7.03]	Embedded in CSCOPE cost	$11,488 [$6.21]	$15,745 [$8.51]	NONE	$4,135 [$2.24]	$97,322

SOURCE: Texas Government Effectiveness and Efficiency Report, Improve State Oversight and Support of School District Curriculum Management Systems, 2009.

No fiscal impact is assumed for this recommendation until decisions are made regarding the district's contract for its curriculum management tool and the district's plans for continued curriculum development.

COMPLETION (REC. 14)

LISD has not adequately addressed the issue of student dropout. More students are dropping out of LISD compared to all students in the state and to various student population groups in the state. **Exhibit 3–7** illustrates the difference between LISD and state annual dropout rates for grades 7–12 in school year 2008–09 for all and for various population groups.

Although LISD's school year 2008–09 performance data for these groups showed an improvement over school year 2007–08, LISD still had a higher percentage of dropouts for each student group than the state average. Most remarkable among these comparisons is the percentage of LEP students who are dropping out. When reviewing AEIS completion indicators, such as 4-Year Completion Rate (Grades 9–12), 5-Year Extended Completion Rate (Grades 9–12), Completion Rate II, and Completion Rate I, LISD students still perform below the state average, though the class of 2009 did receive GEDs at a slightly higher rate than the state average (4-Year Completion Rate Grades 9–12). However, it should be noted that the district received a rating of Academically Unacceptable in school year 2009–10 because of its Completion Rate I (Graduates and Continuers) Class of 2009 of 79.9 percent.

To increase the number of high school graduates, LISD started the Success Academy in school year 2008–09 as an effort to provide half-day, flexible programming to students who are behind in credits, pregnant, or have childcare or work conflicts. In school year 2009–10, 15 students attended Success Academy according to AEIS reports, and in school year 2010–11, staff reported enrollment of 19 students. According to the principal, 13 students graduated from the Academy last year, which is an increase from the first year it opened. The maximum number of students the Academy can handle is 15 students per session (morning and afternoon) due to the availability of computers. District staff reported that the district "does not have the resources to put all kids in who need it."

Success Academy has a high degree of support from the school community and is seen as making a valuable contribution to improving the district's services to students who are considered at risk of not completing high school. Students can elect to go to the Academy, or they can be referred by the school counselor. Typically, reasons for transfer to Success Academy include poor performance in a credit-recovery class at the high school and poor attendance. Success Academy is staffed by a principal and full-time special education teacher. Content specialists from other campuses rotate through the Academy throughout the day. The counselor, nurse, and librarian from the middle school also provide support to Academy students. The primary curriculum used at Success Academy is Odysseyware, a computer-based credit recovery system. Students are able to login to Odysseyware at home, providing round-the-clock learning opportunities. Fine arts coursework is textbook driven.

Success Academy's actual operating expenditures from all funds per student for school year 2008–09 was $39,356. Instructional costs were $27,063 per student. Other districts, though larger, report costs for alternative campuses under $10,000 per student.

While Success Academy has increased the district's completion rate, the dropout rate is still above the state average for all students and some student groups (**Exhibit 3–7**).

LISD should research proven dropout recovery and prevention strategies and apply for TEA grants to implement proven programs that will increase the chances of completion for every student in LISD.

EXHIBIT 3–7
ANNUAL DROPOUT RATES BY STATE AND DISTRICT (GRADES 7–12)
SCHOOL YEAR 2008–09

	ALL	AFRICAN AMERICAN	HISPANIC	WHITE	SPECIAL ED	ECON DISAD	LEP	AT RISK
State	2.0%	3.1%	2.6%	0.9%	2.5%	1.7%	3.2%	2.6%
LISD	**2.9%**	**4.0%**	**3.4%**	**1.5%**	**3.1%**	**1.4%**	**10.0%**	**3.1%**

NOTE: The numbers in bold show the areas in which LISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, AEIS state and district reports, 2009–10.

TEA provides information about state and federal resources on replicating proven strategies for dropout prevention and recovery based on the following four key principles:

- implement data systems to identify struggling students who need early intervention, determine their needs, and provide appropriate services to these students;
- provide learning environments that are personalized and rigorous and relevant to help students be better prepared academically and socially for high school completion and post-secondary success;
- use mentors as role models and advocates who can help students address academic, social, and emotional needs that are barriers to academic achievement; and
- provide targeted academic support and rich learning environments to students who are behind in school to help them address skill gaps.

One program that has been empirically linked with reduced dropout rates is Communities in Schools (CIS). CIS is aligned with the above key principles. TEA also provides many additional resources to assist schools and districts in reaching every student and making them all high school graduates. Some TEA dropout prevention/recovery programs include the following:

- 9th Grade Transition and Intervention Program;
- National High School Center Early Warning Data System;
- Collaborative Dropout Reduction Program;
- Life Skills for Student Parents;
- Texas GEAR UP;
- 21st Century Community Learning Centers;
- Algebra Readiness;
- Limited English Proficient Student Success Initiative; and
- Optional Extended Year Program.

LISD should also expand Success Academy to serve more students. Computers could be moved to Success Academy, thereby increasing the number of students the campus can serve and reducing the cost per student.

This recommendation can be implemented with existing resources.

GIFTED AND TALENTED AND ADVANCED ACADEMICS (REC. 15)

LISD does not provide instructional programming targeting high performers and does not ensure college readiness. According to AEIS reports, in school year 2009–10, LISD provided 155 students, or 8 percent of its student population, gifted and talented education programming. In the district's Gifted & Talented Handbook (2010), the mission of the LISD gifted and talented (G/T) program is to "provide advanced, appropriate, and quality educational experiences, which develop in students, higher level thinking skills, creative problem solving, and the desire for excellence."

The program is staffed by one teacher and has a budget of $38,883 or $251 per student. The state average is $88 per student. The small size of the district may be the cause of the higher than average rate per student. Larger districts may benefit from economies of scale.

The district's handbook identifies G/T programs in Grades K–5, entitled Advanced Challenges Enriching Students (ACES). One G/T teacher's time is split between South and North Elementary. G/T students are pulled out of their regular classroom for science instruction.

Middle and high school G/T programming are not addressed in the handbook. District staff reports that middle school G/T students are provided services through the Texas Tech Robotics Program. The class is project based; integrates science, technology, reading, and writing; and requires 35 hours of community service per semester. It is taught for two hours per day by two teachers, and high achieving students can be in the class as well as those who are identified as G/T.

At the high school, G/T students are offered honors classes and Community Problem Solving, though not many students take advantage of these opportunities. Staff reported that freshmen typically took the Community Problem Solving class and then "strong programs (such as Pre-AP and AP) draw them away from G/T."

Though performance data are not reported specifically for G/T students, certain indicators are frequently used to measure advanced academic performance. **Exhibit 3–8** shows that LISD students did not achieve near the state average on Commended performance on TAKS. G/T students might be expected to be among those students performing at the Commended level. Performance is shown for all tests for various district population groups and state averages for the same groups. Additionally, across other indicators, for all populations, LISD students performed

EXHIBIT 3–8
ADVANCED ACADEMIC INDICATORS BY STATE AND DISTRICT BY STUDENT GROUPS
SCHOOL YEAR 2009–10

	ALL	AFRICAN AMERICAN	HISPANIC	WHITE	SPECIAL ED	ECON DISAD	LEP	AT RISK
TAKS Commended Performance All Tests 2010								
State	15.0%	8.0%	10.0%	23.0%	4.0%	9.0%	7.0%	4.0%
LISD	**6.0%**	**4.0%**	**3.0%**	**18.0%**	5.0%	**4.0%**	**2.0%**	**1.0%**
Advanced Course/Dual Enrollment Completion 2008–09								
State	24.6%	18.1%	20.8%	29.4%	5.7%	18.7%	11.1%	13.2%
LISD	**15.0%**	**10.3%**	**8.8%**	32.8%	**2.7%**	**8.7%**	*	**3.9%**
Advanced Placement (AP)/International Baccalaureate (IB) Results—Tested 2009								
State	21.2%	12.9%	17.3%	25.1%	n/a	n/a	n/a	n/a
LISD	**0.0%**	**0.0%**	**0.0%**	**0.0%**	n/a	n/a	n/a	n/a
Recommended High School Program (RHSP)/Distinguished Achievement Program (DAP) Graduates Class of 2009								
State	82.5%	75.7%	83.4%	82.9%	24.5%	79.9%	64.8%	71.3%
LISD	**77.2%**	87.5%	**77.0%**	**75.0%**	**11.1%**	**77.3%**	-	**60.4%**
Texas Success Initiative (TSI)—Higher Education Readiness Component—ELA 2010								
State	60.0%	51.0%	52.0%	70.0%	18%	49.0%	10.0%	42.0%
LISD	**56.0%**	**17.0%**	58.0%	**65.0%**	**<1.0%**	**44.0%**	*	50.0%
Texas Success Initiative (TSI)—Higher Education Readiness Component—Mathematics 2010								
State	66.0%	49.0%	58.0%	78.0%	20.0%	55.0%	27.0%	42.0%
LISD	**37.0%**	**17.0%**	**40.0%**	**38.0%**	**11.0%**	**42.0%**	*	**22.0%**
Scholastic Assessment Test (SAT)/American College Test (ACT) Results At/Above Criterion—Class of 2009								
State	26.9%	7.7%	11.8%	40.6%	n/a	n/a	n/a	n/a
LISD	**11.4%**	*	16.7%	**10.5%**	**n/a**	**n/a**	**n/a**	**n/a**
College-Ready Graduates—Both Subjects (Eng Lang Arts and Mathematics)—Class of 2009								
State	47.0%	29.0%	35.0%	60.0%	5.0%	32.0%	4.0%	18.0%
LISD	**28.0%**	**14.0%**	**22.0%**	**42.0%**	*	32.0%	*	**12.0%**

NOTES: N/A = data not collected
*Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34CFR Part 99 and Texas Education Agency procedures OP 10-03.
- = no students
The numbers in bold show the areas in which LISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, AEIS state and district reports, 2009–10.

considerably below the state averages, with the exception of White advanced course/dual enrollment completion.

The numbers in bold in **Exhibit 3–8** show where LISD students are performing below state averages. With few exceptions, LISD students perform below state averages for college readiness indicators. Though some pre-AP and AP courses are offered, no LISD students took the AP test. Instead, the district predominately offers dual credit courses through Howard College. Some students leave high school with 34–36 hours of college credit, which is seen as a cost savings for them. However, some parents and teachers expressed concern that more rigor was needed in these courses, citing the low SAT/ACT scores of students. Comments indicated an attitude of "making sure students pass, instead of making sure they learn."

LISD should expand and improve the rigor of its G/T and advanced academics programs.

LISD should clarify the purpose and implementation of its G/T program to ensure that all aspects of giftedness are addressed, that G/T students receive differentiation beyond students of similar age and experience, and that G/T students

are served in compliance with the Texas State Plan for the Education of Gifted/Talented Students.

LISD should engage high school students and parents and collectively examine LISD's dual credit courses and explore the extent to which they are meeting the community's and students' needs. The role of Pre-AP and AP courses in the district should also be discussed.

The Texas State Plan for the Education of Gifted/Talented Students provides a thorough structure for self-study to determine the quality of services LISD is providing to its G/T students. The State Plan offers criteria for programs that are in compliance, recommended, and exemplary. Some components of particular importance include the following:

- 2.1C. Identified G/T students are assured an array of learning opportunities that are commensurate with their abilities and that emphasize content in the four (4) foundation curricular areas.
- 3.1C. An array of appropriately challenging learning experiences in each of the four (4) foundation curricular areas is provided for gifted/talented students in grades K–12, and parents are informed of the opportunities (19 TAC §89.3).
- 3.3C. Opportunities are provided to accelerate in areas of student strengths (19 TAC §89.3(4)).

Once the self-assessment is completed, LISD should take steps to ensure that its G/T students are offered the kinds of learning experiences that the State Plan describes. Of key importance is training for all teachers in differentiation strategies. Before undertaking this training, LISD should arrive at a functional definition of differentiation in LISD and the benefits it could offer the district. The training should not be a one-time training, but an ongoing series with classroom support and coaching.

TEA offers a variety of tools to assist districts, schools, and teachers in ensuring that G/T students have the benefit of rigorous, appropriate learning opportunities, including the following:

- Equity in Gifted/Talented Education;
- Gifted/Talented Teacher Toolkit;
- The Small Schools Resource Guide;
- Reading Strategies for Advanced Primary Readers;
- Estudios; and
- Lighthouse Initiative for Texas Schools (differentiating AP for G/T students).

All of these resources are available at no cost to districts.

LISD should also explore incentives provided by TEA for Advanced Placement in Texas Administrative Code (TAC) §74.24, which includes awards for schools, teachers, and students. In addition to ensuring that LISD students are well prepared for post-secondary education, the incentives may compensate for some of the perceived cost benefits of the dual credit program.

Additionally, LISD should investigate the feasibility of the Texas Middle School Program for AP Spanish. According to the TEA website, "The purpose of the Texas Middle School Program for AP Spanish is to engage native Spanish-speaking students in early preparation for college success." The website provides detailed implementation information, available at no cost to the district.

Many universities in Texas offer AP Summer Institutes to prepare classroom teachers to teach AP and Pre-AP courses. The cost for early registration is $450 per teacher. Travel, per diem, and housing/hotels are estimated at $550 per teacher for each four-day session or ($450 registration + $550 travel expenses = $1,000 per teacher.) If the district sent five teachers per year, the total cost would be $5,000 ($1,000 cost per teacher x 5 teachers). TEA offers Teacher Training Reimbursement not to exceed $450 for each AP and Pre-AP teacher attending the training (5 teachers x $450 = $2,250), resulting in an annual cost to the district of $2,750 ($5,000 - $2,250 TEA reimbursement).

TEACHING ASSISTANTS (REC. 16)

LISD has not evaluated or determined the effectiveness of the use of teaching assistants in the educational delivery process, and has not evaluated or defined the job expectations of teaching assistants. The district relies heavily on teaching assistants to meet the needs of students with special needs and students who are English language learners. In interviews with teaching and administrative staff, participants mentioned the district's heavy reliance on teaching assistants and that these employees lack an adequate level of training to meet the high demands placed on them. Among the demands mentioned were:

- Classroom management;
- Student behavioral management;

- Translating content and providing academic support for English language learners;
- Academic support for special education students;
- Managing the school library;
- Filling in for teachers when substitutes cannot be obtained; and
- Serving as long-term substitutes.

The 2009–10 AEIS report shows the district having 54.5 education aides (teaching assistants) or 16 percent of the total staff compared to the state average of 9.8 percent. Education aides in the AEIS report may not include the total number of teaching assistants used in Lamesa ISD. The actual number may be higher as teaching assistants may be categorized in other employee groups as well, such as educational support. According to **Exhibit 3–9**, LISD teaching assistants are the lowest paid compared to peer districts. In contrast, Seminole ISD pays its educational aides $19,885 or $6,712 more than Lamesa ISD. Further, an average salary for a teacher in Lamesa ISD is $43,267.

As discussed in the Human Resources Management chapter, LISD's position description for a Classroom Teaching Assistant identifies a teaching assistant's duties as assisting the teacher in the preparation and management of classroom activities and administrative requirements. They work under the supervision of a certified teacher.

On the other hand, the primary duties test for teachers includes the following [*Fact Sheet #17A-Exemption for Executive, Administrative, Professional, Computer and Outside Sales Employees Under the Fair Labor Standards Act (FLSA).*]

- the employee's primary duty must be the performance of work requiring advanced knowledge, defined as work, which is predominantly intellectual in character and which includes work requiring the consistent exercise of discretion and judgment;
- the advanced knowledge must be in a field of science or learning; and
- the advanced knowledge must be customarily acquired by a prolonged course of specialized intellectual instruction.

Moreover, the United States Department of Labor (DOL) (*Fact Sheet #17D - Exemption for Professional Employees Under FLSA*) defines teachers as one whose primary duty is "teaching, tutoring, instructing or lecturing in the activity of imparting knowledge… in an educational establishment…. Having a primary duty of teaching, tutoring, instructing or lecturing in the activity of imparting knowledge includes, by its very nature, exercising discretion and judgment."

In contrast, TEA's *Requirements for Highly Qualified Paraprofessionals* defines a teaching assistant as "an employee of a local education agency who provides instructional support. Duties of a paraprofessional may include (1) providing one-on-one tutoring if such tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher; (2) assisting with classroom management, such as by organizing instructional materials; (3) providing instructional assistance in a computer laboratory; (4) conducting parental involvement activities; (5) providing instructional support in a library or media center; (6) acting as a translator; or (7) providing instructional support services under the direct supervision of a highly qualified teacher. [Title I, Section 1119(g)(2)]." The district has not evaluated each of its teaching assistant positions as compared to the following questions:

1. Is a certified teacher supervising the teaching assistant? If so, whom? What percentage of the time is that teaching assistant supervised by the certified teacher?
2. What are the duties of the teaching assistant? Do they extend beyond preparation and management of classroom activities and materials and administrative requirements?

EXHIBIT 3–9
AVERAGE SALARIES FOR ALL STAFF, TEACHERS, AND EDUCATIONAL AIDES
LAMESA ISD AND PEER DISTRICTS
SCHOOL YEAR 2009–10

POSITION	LAMESA	VENUS	CONNALLY	CENTER	SEMINOLE
All Staff	**$32,786**	$35,278	$35,278	$34,568	$40,459
Teachers	**$43,267**	$41,132	$42,185	$41,827	$49,995
Educational Aides	**$13,173**	$14,582	$15,887	$14,692	$19,885

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

3. Does the teaching assistant's work require advanced knowledge which is predominantly intellectual in character and which requires the consistent exercise of discretion and judgment?
4. Does the teaching assistant's work require advanced knowledge in a field of science or learning?
5. Does the teaching assistant's work require advanced knowledge customarily acquired by a prolonged course of specialized intellectual instruction?
6. Does the teaching assistant's work involve teaching, tutoring, instructing, or lecturing in the activity of imparting knowledge? Is tutoring being provided at a time when the student would otherwise be receiving instruction from a teacher?

If teaching assistants are working as a substitute teacher on a short- or long-term basis or managing a library or the nurse's office, they may not be receiving supervision from a certified teacher. In providing academic support to students in lieu of a bilingual/English as a second language teacher or inclusion teacher, the teaching assistant's duties may extend beyond preparation and management of classroom activities and administrative requirements. Teaching assistants serving as tutors who are providing academic support to students requires the consistent exercise of discretion and judgment, including advanced knowledge of content in certain situations.

However, given the performance of special education and limited English proficient students as documented in other sections of this chapter, it is imperative that the district reexamine its practice of using teaching assistants instead of certified teachers in key areas. Administration and teaching staff stated repeatedly about the heavy demands placed on inclusion teachers including a concern about the ability of teaching assistants to meet the needs of English language learners.

As part of the process for reexamining the use of teaching assistants instead of certified teachers in key areas, the district should evaluate the job expectations of each teaching assistant to ensure that their expectations are aligned with the district's job description for teaching assistants and do not overlap with teachers' specified duties. Where there are discrepancies, the staffing of the position should be changed or responsibilities modified.

Additinally, LISD may determine that certain teaching assistant positions need to be replaced with certified teachers. Currently, one teacher can be hired for every 3.28 teaching assistants (based on average salaries noted in the AEIS report). While decisions would need to be based on student needs, additional teachers may be needed for inclusion and bilingual/ESL. By eliminating teaching assistants, several teachers could be added at minimal cost to the district.

The district should consider aligning placements with teaching assistants' appropriate qualifications, responsibilities, and training for those remaining teaching assistant positions.

No Child Left Behind Act (NCLB) requires paraprofessionals (educational aides) assigned to instructional duties on a Title I campus or those that have at least part of their salary paid for by Title I to meet the Paraprofessional Highly Qualified requirements. Requirements include:

- At least two years of study at an institution of higher education [defined as completion of 48 semester hours (or equivalent trimester hours) of college coursework or an applicable number of semester hours as defined by the institution of higher education attended, whichever is less;] or
- An associate's (or higher) degree; or
- Demonstration of a rigorous standard of quality and can demonstrate, through a formal state or local academic assessment –
  - Knowledge of, and the ability to assist in instructing, reading, writing, and mathematics; or
  - Knowledge of and the ability to assist in instructing, reading readiness, writing readiness, and mathematics readiness, as appropriate.

TEA also offers three levels of certificates for teaching assistants.

In terms of training, all teaching assistants should receive training in overall district and campus policies and procedures as well as information on the district's vision and mission. Understanding where they fit in the big picture of student achievement is critical for every employee. Based on the analysis of each teaching assistant's role and responsibilities, training needs can be determined. For example, teaching assistants who are translating should have the academic level and content knowledge in both languages to ensure accurate translations. Teaching assistants who are assisting with technology should have an appropriate level of technology knowledge and skill. If teaching assistants are providing tutoring at times teachers are not available or supporting learning under the direction of a certified teacher, these

teaching assistants should have skills in student motivation and behavior management.

Finally, both teaching assistants and the teachers who supervise them should receive training in building effective collaborative relationships in support of student learning. Clear boundaries and expectations should also be established and participants should learn processes for collaborative decision-making, problem solving, and conflict resolution.

No fiscal impact is assumed for this recommendation until the training decisions are made regarding teachers and teaching assistants.

PROFESSIONAL DEVELOPMENT (REC. 17)

LISD does not have a systematic professional development (PD) plan in place to provide all teachers and teaching assistants with the skills they need to ensure that all students have opportunities to learn at their highest potential. Responsibility for PD is shared by the assistant superintendent of Personnel, principals, and the director of Curriculum and Federal Programs. According to the assistant superintendent of Personnel, who supervises principals, principals have historically directed professional development at the campus level and the quality varies. At the district level, PD offerings appear to be aligned with the district's adoption of new programs. Some staff members questioned the research base of many of these new programs, indicating that programs and the professional development were not coherent and that teachers had difficulty committing to new approaches. As one district staff member said: "We don't always need to be the first ones to try [a new program]. It doesn't present a good image of the school and causes doubt in leadership among teachers….Teachers wonder when we are we going to change again." Region 17 also provides a variety of professional development sessions to LISD staff in areas such as English language arts, gifted and talented, mathematics, science, social studies, BIL/ESL, early childhood, migrant, special education, and positive behavioral interventions and support.

In terms of beginning teachers and those new to the district, as stated in the student performance section, hiring criteria has been refocused on identifying new staff members who will be equipped and eager to work with the district's high-needs student population. However, there are several challenges the district faces in retaining new teachers. Housing in the Lamesa area is limited. One Board of Trustees member said that the housing situation in Lamesa made it difficult to retain new teachers, and that many new teachers gained experience in LISD and then moved away. This resulted in a situation that was "costly to the district [and] frustrating for those who stay [and] for those who have to do retraining for those who are new to the district."

While limited training is provided specifically for new hires, new teachers reported needing additional support to provide differentiated instruction. According to teachers, curriculum specialists at each school "help first-year teachers understand the curriculum and provide a lot of support." Beginning teachers are assigned mentors; however, assignments are not necessarily made according to best practices where teachers are matched with similar subject area, grade level tenured teachers. One beginning teacher reported that she "hardly ever sees" her assigned mentor. Mentor teachers report that they do not have time to mentor and that many lack confidence in serving in a mentor role. While mentors at South Elementary received one day of training and a $100-per-year stipend, most mentors at other campuses were not provided training or stipends. The district's attitude was summed up by one teacher: "Because you're a veteran [teacher], you're trained [as a mentor]."

Training for teachers to support special populations also appears to be sporadic. Though the assistant superintendent of Personnel said that LISD provides training for inclusion, and some educators participate in Region 17 training, teachers generally reported that there was not consistent training on inclusion and special needs students. A similar situation appears to exist with ESL students. Some teachers reported an online training, while others stated that they had had one day of training. Department chairs indicated that they have had Sheltered Instruction Observation Protocol (SIOP) training, and reported that the ELL strategies promoted through the training were "great for all kids." Because of the possible under-identification of LEP students in the district and LEP student performance issues, training in ELL strategies should occur districtwide.

Current professional development efforts in the district are focused on the Margaret Kilgo curriculum model. Some teachers have attended formal training with more planned for the future, with the expectation that trained teachers will support campus redelivery of the training. The focus of the PD has been TEKS analysis, with an emphasis on understanding Student Expectations. Previous efforts to train teachers in TEKS analysis have lacked consistency because of turnover. Department heads indicated that they have had good training in data analysis and at the high school, department heads said they had been looking at

TAKS results for a long time. However, teachers in general indicated that they needed more training on using data. With the move to the new curriculum, teachers at South Elementary did report looking very closely at the Measures of Academic Progress (MAP), the benchmark assessment system used by the district; the Texas Primary Reading Inventory; and Dynamic Indicators of Basic Early Literacy Skills (DIBELS) as well as TAKS performance data to compare performance on Grade 3 TAKS with data from the lower grade levels. Curriculum training has relied heavily on meetings in which curriculum specialists meet with teams of teachers. Principals also attempt to attend these meetings regularly and are sent minutes of each meeting.

LISD's heavy investment in technology, especially in whiteboards, also indicates training needs. Staff members reported some training on how to use the boards, adding that newer teachers use the boards more extensively than others and that some teachers are reluctant to use them at all.

The district relies heavily on teaching assistants, and staff indicated these employees need more training to meet the high demands placed on them. For example, one staff member noted: "Paras usually are the ones who send [students] to the office," possibly indicating a lack of classroom management skills. Administrators noted that one purpose of walk-throughs was to ensure that teaching assistants are on task.

As a result of inconsistent, unfocused professional development efforts, LISD has staff with uneven skills, and the district does not have a systematic, strategic approach for addressing deficiencies. Without a more focused, consistent approach to professional development, the district is likely to continue to have high turnover and achievement gaps.

LISD should implement a systematic and strategic districtwide professional development plan for all instructional staff that provides differentiated learning opportunities based on staff needs and student performance data. Responsibility for coordinating development of the plan should be assigned to a single point of contact that can provide a districtwide perspective rather than having PD responsibilities fragmented across the district. The plan should begin with a needs assessment that is driven by student performance and staff needs. For example, a needs assessment may find staff requires training in the use of instructional technology. As previously discussed, the review team noted that while the district has made a significant investment in equipment and software, interviews with staff indicated that staff is not fully using the new equipment. After identifying priority areas for training for different staff classifications, such as new teachers, teaching assistants, and tenured staff, the district should seek to provide on-going, job-embedded approaches to training. The campus-based curriculum specialists offer one avenue for leading trainings. An organizing structure for the curriculum specialists to use in providing on-going training could be an approach similar to the model used by Johnson City ISD (JCISD) in establishing professional learning communities (PLC).

The main implementation steps at JCISD included:

- TEA waiver for monthly districtwide early release days to be used for professional development;
- ESC-provided training for PLC leads, campus administrators and campus staff, including campus-specific follow-up to establish PLC goals and outcome targets;
- campus-tailored implementation to meet campus needs; and
- systematic districtwide progress monitoring of PLC implementation including: surveys on staff perception data, outcome data used to monitor progress, and student data used to monitor progress.

This practice was implemented in JCISD using Title II, Part A funds, and the annual average cost was approximately $12,750.

Cost components included the following:

- PLC training and technical assistance from the regional education service center;
- stipends for PLC leaders; and
- substitutes and travel for facilitators and principals to visit other campuses.

The cost for implementing a systematic and strategic districtwide professional development plan in Lamesa assumes similar costs to those in JCISD.

BILINGUAL/ENGLISH AS A SECOND LANGUAGE PROGRAMMING (REC. 18)

LISD identifies a disproportionately low number of Limited English Proficient (LEP) students through home language surveys compared to U.S. Census Bureau estimates of the number of Spanish-dominant homes in Lamesa. Additionally, LISD English Language Learners (ELL) academic services

could be improved by offering a Bilingual (BIL)/English as a Second Language (ESL) program and reducing reliance on uncertified teaching assistants to provide ELL students with academic support.

LISD does not have enough identified students at each grade level to provide a BIL/ESL program according to Texas Education Code 29.053 (c) requirement of 20 or more students of limited English proficiency in any language classification in the same grade level as initially identified by the home language survey. **Exhibit 3–10** displays the number of students identified as LEP by the home language survey and the total grade-level enrollment for the district.

The percentage of students from Spanish-speaking homes identified through the district home language survey process is significantly below the percentage identified by the U.S. Census Bureau. **Exhibit 3–11** shows that the American Community Survey administered by the U.S. Census Bureau estimates 43 percent of homes in Lamesa speak a language other than English, and 41 percent speak Spanish, suggesting that some eligible Hispanic students may not be identified for LEP academic services.

Exhibit 3–12 represents district and state demographics for school year 2009–10. It indicates that the percentages of students identified as eligible for LEP services is below the state average.

Interview data indicated that the possible under-identification may stem from a general lack of awareness about the benefits of BIL/ESL programs among the Hispanic community. Specifically, interview participants suggested that some in the Hispanic community want their children to assimilate and view speaking Spanish as delaying this process and therefore do not indicate their children come from Spanish-dominant homes. Additionally, school staff responsible for assisting with the home language survey, often front office administrative staff, may not have appropriate training to advocate for program participation in this environment. One impact of under-identification is that all students may not be receiving the level of academic support that they could if enrollment were high enough to offer a BIL/ESL program as demonstrated by the Hispanic and LEP student group academic performance data.

Exhibit 3–13 shows elementary grade level TAKS reading and mathematics performance for LISD Hispanic and LEP students, compared to similar students statewide and to total students statewide. Across grade levels and student groups, LISD reading performance was consistently below state performance averages for the Hispanic and LEP student groups and total students statewide. Across grade levels and

EXHIBIT 3–11
AMERICAN COMMUNITY SURVEY HOME LANGUAGE ESTIMATES
2005–2009

	NUMBER	PERCENT
Population 5 years and over	8,181	
Language other than English	3,485	42.6%
Spanish	3,374	41.2%

SOURCE: U.S. Census Bureau, American Community Survey, 5-Year Estimates, 2005–09.

EXHIBIT 3–12
LAMESA ISD STUDENT DEMOGRAPHICS
SCHOOL YEAR 2009–10

STUDENT GROUPS	LISD	STATE
Hispanic	73.8%	48.6%
White	19.5%	33.3%
African-American	5.9%	14.0%
Asian/Pacific Islander	0.7%	3.7%
Native American	*	0.4%
Limited English Proficient Students	6.0%	16.9%

*Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34CFR Part 99 and Texas Education Agency procedures OP 10-03.
SOURCE: Texas Education Agency, AEIS state and district reports, 2009–10.

EXHIBIT 3–10
LIMITED ENGLISH PROFICIENT (LEP) STUDENTS BY HOME LANGUAGE
SCHOOL YEAR 2010–11

	PK	K	1	2	3	4	5
Spanish*	10	6	11	11	13	16	12
Total enrollment	116	143	186	155	161	159	144
Spanish LEP as a percent of total enrollment	8.6%	4.2%	5.9%	7.1%	8.1%	10.1%	8.3%

*Other home languages are also represented at the elementary level in LISD including German, Cantonese, Gujarati, Hindi, and Pilipino but at no grade level does the number of non-English speaking homes increase to 20. The highest number of non-English speaking homes is at grade 4.
SOURCE: PEIMS Edit + Reports Data Review -LEP/BIL/ESL and Parental Denial Students by Program and Grade; AEIS 2010–11 District Report.

student groups, LISD mathematics performance was consistently below state student group and total students' statewide performance.

Considering student performance, significant achievement gaps exist between the Hispanic and White student groups across the elementary grade levels in most subject areas tested as described in the student performance section. Additionally, the LEP student group is the lowest performing. The number of students identified as LEP and the academic performance of this group and the Hispanic student group indicate a need for better academic support.

Not identifying all students eligible for BIL/ESL services results in a loss of state and federal funding and fewer resources to provide adequate academic services to all students. To calculate a district's BIL/ESL allotment, the district's adjusted allotment (AA) is multiplied by 0.1 and then multiplied by the number of BIL/ESL students in average daily attendance (ADA).

[AA x 0.1 x bilingual or ESL ADA = bilingual/ESL allotment]

Additionally, federal Title III, Part A funds are available for language instruction for LEP and immigrant students and to provide high quality professional development in language instruction. Title III, Part A awards are also based on LEP identification and enrollment. The district could receive more support were identification higher.

The district should leverage positive community relationships garnered by the migrant program staff to invest in a large-scale community awareness and outreach campaign about the benefits of BIL/ESL programming.

Research-based best practices for BIL/ESL program implementation suggest that this effort must begin with district and campus leadership efforts that articulate and advocate non-negotiables such as equally high expectations for ELLs and other students and a climate of respect for cultural diversity. District leadership can then enlist migrant staff, who as long-term community members, are viewed community-wide as trusted liaisons between the community and school to lead communication efforts. An effort similar to the Pharr-San Juan-Alamo ISD (PSJA ISD) outreach effort described below could be applied to LISD BIL/ESL outreach efforts.

In conducting drop-out prevention/recovery outreach, PSJA ISD organized a community wide door-to-door campaign. The campaign took place on three consecutive Saturdays in September. The district recruited volunteers who included community members such as representatives from community organizations and churches, as well as school staff and parents. Activities for the events included breakfast, an address by the superintendent, training, and information packets provided to volunteers. Training focused on programs, guidelines, and home visit safety. Volunteers were grouped and assigned with school staff who served as coordinators. Groups were then assigned to different areas of the community. Packets included a brochure, flyers about the program, and message door hangers in appropriate languages. After the walk, volunteers returned documentation from their contacts and were provided refreshments.

Additionally, the district should invest in also providing staff that distribute, assist, administer, and collect home language surveys with training in how to advocate for program participation and the benefits of program participation. Often, front office staff is involved and expected to assist

EXHIBIT 3–13
TAKS READING AND MATHEMATICS PERFORMANCE, HISPANIC, AND LEP STUDENT GROUPS
SCHOOL YEAR 2009–10

	GRADE 3		GRADE 4		GRADE 5	
% State Total Students Passing Reading TAKS	**92**		**86**		**86**	
	LISD	**STATE**	**LISD**	**STATE**	**LISD**	**STATE**
% Hispanic Students Passing Reading TAKS	84	90	63	87	75	81
% LEP Students Passing Reading TAKS	65	89	58	73	57	62
% State Total Students Passing Math TAKS	**87**		**89**		**86**	
	LISD	**STATE**	**LISD**	**STATE**	**LISD**	**STATE**
% Hispanic Students Passing Math TAKS	64	84	59	87	58	83
% LEP Students Passing Math TAKS	59	84	58	85	43	73

SOURCE: Texas Education Agency, AEIS state and district reports, 2009–10.

with survey completion. Ensuring that all staff understand the importance of, and are trained to advocate for, participation may be an effective strategy in increasing identification. One possible approach is to assign LISD's trained migrant personnel to staff the front office during school registration. While these staff members assist with migrant student registration, they could also assist with home language survey completion. Because these staff members have a high profile in the Hispanic community, accurate identification could improve if families are working with familiar, trusted, and trained staff.

After sufficient numbers of students are identified, the district will need to implement a research-based BIL/ESL program. The district currently has seven teachers with elementary school BIL/ESL certification, two teachers with BIL/ESL supplemental EC–4 certificates, and one teacher with a BIL/ESL supplemental 4-8 certificate. This cadre of BIL/ESL teachers would allow for at least one classroom-level BIL teacher at every elementary grade level.

Finally, the district could also apply for the 19 Texas Administrative Code (TAC)§89.1250, Required Summer School Programs for Children with Limited English Proficiency as authorized under § 29.060 of the Texas Education Code (TEC), which requires districts to provide a summer school program for limited English proficient (LEP) students who will be eligible for admission to kindergarten and first grade at the beginning of the next school year. Funding for the program is reimbursable, allowing additional resources and language support for identified students at no additional cost to the district since it currently operates summer school. Following onsite work, district administration noted that the district currently offers Bilingual summer school annually by placing students in Summer Project SMART (Summer Migrants Access Resources through Technology). Due to limited numbers of LEP students, the district does not currently qualify for the Required Summer School Programs for Children with Limited English Proficiency. However, once sufficient numbers of LEP are identified, the district may qualify and choose to apply for this program.

This recommendation can be implemented with existing resources.

SPECIAL EDUCATION (REC. 19)

LISD special education students do not perform at the state average for special education students or meet Performance-Based Monitoring Analysis System (PBMAS) standards. Also, special education students are sent to discretionary placements at a rate much higher than the state rate or the district as a whole. According to the 2010 PBMAS data, LISD performance on SPED TAKS/TAKS Accommodated does not approach the PBMAS standard as shown in **Exhibit 3–14**.

EXHIBIT 3–14
TAKS SPECIAL EDUCATION STUDENT PERFORMANCE BY PBMAS STANDARD AND DISTRICT
SCHOOL YEAR 2009–10

CONTENT AREAS	2010 PBMAS STANDARD (%) OR STATE RATE	2010 LISD RATE
Mathematics	60.0%	**33.3%**
Reading/ELA	70.0%	**46.8%**
Science	55.0%	**27.0%**
Social Studies	70.0%	**48.1%**
Writing	70.0%	**50%/60%/62.5%***

*2010 LISD Writing Scores received a special analysis looking across three years (2008, 2009 and 2010) of testing due to the small number of students testing in the area of writing for school year 2009–10.
SOURCE: Texas Education Agency Performance-Based Monitoring Analysis System district report, 2010.

The performance of LISD special education students is significantly lower than the state standard in all areas. Though closer to the state average, writing was still flagged for ongoing review by TEA. Additionally, the district was flagged in PBMAS for special education TAKS-M participation rate. The state standard is 20 percent, and LISD's rate was 37 percent.

Over a six-year period, the number of students identified for special education services remained steady at approximately 12 percent though state rates declined. However, in school year 2009–10, LISD had a dramatic decrease in the number of students served in special education. Though still somewhat over the state average, special education representation was not flagged in PBMAS. **Exhibit 3–15** illustrates trends comparing LISD to the state.

District and school officials attribute this recent decrease to the Student Assistance Team (SAT) process, dyslexia services, Response to Intervention (RTI) approaches, and a diagnostician at each campus. Staff reported that South Elementary had 150 SAT meetings last year, with less than one out of every 10 students going through the SAT process referred for special education services.

EXHIBIT 3–15
SPECIAL EDUCATION IDENTIFICATION BY STATE AND DISTRICT
SCHOOL YEARS 2004–05 TO 2009–10

SCHOOL YEAR	STATE RATE	LISD RATE
2009–10	9.0 %	**10.1%**
2008–09	9.4%	**12.7%**
2007–08	10.0%	**12.0%**
2006–07	10.6%	**12.5%**
2005–06	11.1%	**12.0%**
2004–05	11.6%	**12.5%**

SOURCE: Texas Education Agency, AEIS state and district reports, 2004–05 to 2009–10.

LISD serves special education students through three primary approaches—inclusion, resource classes, and life skills. LISD began using the inclusion model in school year 2003–04. Certified special education teachers are used for inclusion support in TAKS-tested areas. Though inclusion teachers monitor performance in other content areas as well, students are supported primarily by teaching assistants in non-TAKS-tested areas. The district promotes a co-teaching inclusion model, but staff cited that implementation fidelity is lacking. Instead of co-teaching, the inclusion teacher often provides instruction to small groups of special education students. Additionally, the degree to which the inclusion model is staffed is dependent on the district's budget. Teachers expressed concern that special education students are not getting as much support as they need. The limitations on the time of the inclusion teacher and the use of teaching assistants may have a negative impact. Some teachers reported preferring the content mastery approach that was used in the past.

The degree to which general education teachers are prepared to teach special education inclusion students is unclear. One district official reported that the district provides sufficient training, though another noted that more training is needed for general education teachers. Some teachers reported that they have not received training in inclusion and that one-time meetings with special education teachers are inadequate for understanding the background of special education students and ensuring that modifications are used consistently.

Though inclusion is the primary model for special education services, resource classes are provided for students who need additional support in tested areas. The lowest functioning students are placed in life skills classes, though they are also placed in resource classes and some general education classes.

LISD was flagged in the PBMAS system for high discretionary Disciplinary Alternative Education Program (DAEP) placements of special education students and placements in in-school and out-of-school suspension. **Exhibit 3–16** shows the difference in the state rate and the district rate of discretionary placements for special education students.

LISD uses discretionary placements far more for its special education students than the state as a whole or than the district as a whole. Staff cited a couple reasons for this. One is that the same students are disciplined repeatedly. Another reason is that teaching assistants are usually the ones who send students to the office.

As a result of inconsistent teacher training, excessive use of teaching assistants, and excessive discretionary discipline placements, special education students will likely continue to be low performing.

LISD should create a planning group to address the needs of its special education students, especially with regard to teacher training, the use of teaching assistants, discipline, and inclusion model implementation fidelity.

EXHIBIT 3–16
DISCRETIONARY DAEP PLACEMENT BY STATE AND DISTRICT
SCHOOL YEAR 2009–10

TYPE OF DISCRETIONARY PLACEMENT	2010 STATE SPED OR ALL RATE	2010 DISTRICT SPED RATE	2010 ALL DISTRICT PLACEMENTS	DIFFERENCE IN SPED RATE AND ALL DISTRICT RATE
Disciplinary Alternative Education Program (DAEP)	1.0%	**8.7%**	3.8%	**4.9%**
In-School Suspension (ISS)	10.0%	**92.4%**	48.8%	**43.6%**
Out-of-School Suspension (OSS)	6.0%	**43.1%**	15.1%	**28.0%**

SOURCE: Texas Education Agency PBMAS, 2010.

According to Lipsky (2006), the inclusion approach for special education presumes that special education is not a place or a program but is rather a unified system in which the entire district works together to provide access for special education students to all academic, extracurricular, and nonacademic aspects of school. Key components of such a whole district approach include the following:

- district leadership that collaborates with all stakeholder groups in all aspects of the system;
- fundamental changes in the district procedures, including budgeting;
- campus-level planning processes that focus on high-level outcomes for all students; and
- assurance that the needs of special education students, as well as those of all other students, are met.

The district should consider the following process from the National Center on Educational Restructuring and Inclusion for reviewing its inclusion model:

- conduct a self-assessment;
- develop the school/district plan;
- implement the school plan; and
- evaluate outcomes and revise accordingly.

This process could be incorporated into annual district and campus planning.

As part of this process, staffing of special education services should be examined to determine the most effective use of certified special education teachers and teaching assistants. Nationally, the overreliance on teaching assistants for some of the neediest students is being questioned. While there is not significant research that supports the extensive use of teaching assistants, there is research that documents some inadvertent detrimental effects on special education students of the excessive use of teaching assistants. Some of these include separation from classmates, unnecessary dependence, feelings of stigmatization, and loss of personal control.

State and federal requirements provide guidance on training, the use of teaching assistants, and positive behavior support, which can be used by district and campus planning committees. According to Texas Education Code §21.451(d), each Local Education Agency (LEA) or school district is to provide staff development to teachers based on scientifically based research that relates to the instruction of students with disabilities. In addition, training must be provided to a teacher who works outside of special education if the teacher does not possess the knowledge and skills necessary to implement the individualized education program (IEP) developed for a student with disabilities TEC §21.451(e).

An LEA can determine the time and place for the training and must maintain appropriate training documentation. In developing or maintaining the training, an LEA is required to consult with individuals who have expertise in research-based practices for students with disabilities, including individuals from colleges, universities, nonprofit organizations, regional education service centers, and/or qualified district staff.

In alignment with recommendations included in the professional development section of this chapter and the Human Resources chapter, LISD should survey all teachers, teaching assistants, and principals on their levels of expertise with various aspects of instruction, such as differentiation, inclusion, and discipline of special education students. These data should be triangulated with performance data and used in Professional Development and Appraisal Systems (PDAS) planning for professional growth of teachers. Because all teachers do not appear to have the same needs in this area, professional development should be provided based on individual needs, possibly using a tiered, or differentiated, approach. For example, general education, inclusion, resource, and life skills all may have different needs, which would not be well served by a one-size-fits-all session. Additionally, regular follow-up should be provided.

Where those needs cannot be met through training offered by Region 17, other resources should be identified and implemented on an ongoing basis. An example might be book groups reading *Co-teaching Booklet Coordinating for Reading Instruction: General Education and Special Education Working Together*. The purpose of this booklet is to provide strategies to help general and special education teachers, speech and language pathologists, school counselors, teaching assistants, and administrators (e.g., principals, special education coordinators) plan for and implement co-teaching during reading instruction in classrooms where a variety of learners, including students with disabilities, are represented.

LISD should also expand and ensure consistent implementation of a behavior support system. With the support of Region 17, LISD can benefit from additional involvement in the Positive Behavioral Interventions and Support (PBIS) Network to deal with its special education discipline issues. For example, Region 17's Disproportionate

Impact PBIS Project has as its goal "to reduce the disproportionate referral rate of African-American, Latino, and special education students to out-of-classroom placements."

To implement this recommendation, LISD should investigate the costs of the services from Region 17. District documents indicate it could cost LISD an estimated $6,000 per year to participate in the Region 17 Co-op based on what the district pays to participate in the Region 17 GT Co-op. The $6,000 fiscal impact is assumed for this recommendation

STUDENT SERVICES (REC. 20)

The health and social support services LISD provides to its high population of economically disadvantaged students does not enable them to perform to the best of their abilities. Seventy-five percent (75%) of students in LISD are classified as economically disadvantaged (ED). As would be expected in a district with such a high percentage of ED students, these students appear to have a wide range of needs. Though not limited to students who are economically disadvantaged, teachers cite the many social/emotional issues that these students are trying to cope with, including divorce in the family, violence at home, parents in prison, depression, and self-injury. The annual dropout rate for grades 9–12 in school year 2008–09 was 4.2 percent, and the percentage of students enrolling in and completing higher education is low according to staff. The district has also historically had a high teen-aged pregnancy rate. In school year 2002–03, there were 52 drug violations in LISD, and according to staff, the district has many families that require social services. In addition, parents and staff reported a need for vouchers for clothing that had been offered in the past.

LISD is staffed by four counselors, two nurses, two nurses' aides, one librarian, and 3.5 library aides. Of these positions, only the school nurse and nurse aide have job descriptions. The district does not employ a social worker. Several staff members mentioned that when budgets are cut, student support services tend to be cut. For example, the high school previously employed two counselors but now just has one position.

In addition to student support, school counselors are assigned many other duties, including the following:

- testing coordinator;
- 504 testing with diagnosticians;
- scheduling;
- checking grades;
- participating in Language Proficiency Assessment Committee (LPAC) meetings;
- participating in Student Assistance Team (SAT) meetings;
- participating in Admission, Review, and Dismissal (ARD) meetings for students with counseling issues; and
- registering new students.

Staff reported that despite all of these duties, counselors are effective at meeting students' needs. Teachers reported that "counselors are there for students" and that the counselors are good at finding resources students need. The counselor at South Elementary goes with students and parents to Mental Health and Mental Retardation (MHMR) visits when those services are needed. The middle school counselor also serves the alternative campus, Success Academy, and offers individual and small group sessions on topics such as bullying and anger management. The high school counselor was credited with helping most of last year's seniors get accepted into post-secondary educational institutions. It should be noted that in addition to the above duties, the high school counselor also serves as the Career and Technical Education (CTE) coordinator and is responsible for arranging articulation agreements with post-secondary institutions. The high school counselor is supported by a teacher who has a second conference period to assist with testing coordination.

The district nurse and three aides serve all campuses in the district. When the nurse is not on campus, a nurse's aide assumes some of the nurse's duties. In some cases, a teaching assistant helps in the nurse's office with minor concerns. In addition to providing student care, the nurse works with parents and arranges for payment for student needs, such as glasses or medications, if parents cannot afford them.

One librarian and 3.5 FTE library aides staff the five campuses. The library of South Elementary is staffed by a teaching assistant, and students are scheduled to visit the library at least once per week. The North Elementary library is also staffed by a teaching assistant. The middle school librarian also serves the high school and alternative campus.

Since the district does not employ a social worker, counselors and nurses often assume those roles. Additionally, the district takes advantage of other agencies, such as Midland High Sky, which provides home-based counseling, and WTO, which

provides transportation for medical appointments and funding to pay for student medications.

LISD does not appear to have an active volunteer program. Staff reported that parents who were most involved in the school were those who worked in professional jobs while parents of students who are economically disadvantaged participated less. The PTO is inactive at the middle and high schools.

The impact of having a high-needs student population with limited staff to provide social/emotional support services is that classroom learning can be negatively affected because students may have difficulty focusing on academics, and teachers and staff are assuming responsibilities for addressing additional student needs. Given the needs of students and the amount of support the limited staff can offer, learning would improve if LISD provided increased student support services.

LISD should consider implementing Communities in Schools (CIS) to relieve the nurse, counselors, and teachers of social work functions and to help ensure that its economically disadvantaged (ED) students have access to all the supports they need for academic success.

CIS is a national stay-in-school program that is coordinated in Texas through TEA. Twenty-seven CIS programs served nearly 85,000 students in Texas in school year 2008–09. CIS provides case management and whole school services including guidance and counseling; tutoring and academic enrichment; college and career preparation; health, basic needs, fitness, and mental health; mentoring and adult advocates; and parental support and assistance with basic needs. In school year 2008–09, the cost per participant was approximately $750. CIS indicators of student success in school year 2008–09 included improvements in academics, attendance, and behavior. Independent research indicates CIS has been found to be only one of three best practice dropout prevention programs in the nation.

The nearest CIS program to Lamesa is Communities In Schools-South Plains, Inc., located in Lubbock. LISD should contact the program about the possibility of providing services for LISD students.

TEA documentation cites $236 state costs and $526 local cost per participant for case-management services through CIS. Without state funding, LISD would incur an annual cost of approximately $762 per student ($236 state cost + $526 local cost) served by CIS. LISD could coordinate with CIS to prioritize students for different levels of service. For example, of the district's 1,121 at-risk students, it could provide CIS services for the most at-risk 5 percent (approximately 56 students) at a cost of $42,672 ($762 per student x 56 students.) Although LISD may inquire with the Lubbock CIS program about the possibility for receiving state funding, the fiscal impact assumes the district would need to cover all cost for students it would serve in the program.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 3: EDUCATIONAL SERVICE DELIVERY							
12. Ensure the Board of Trustees, Central Office staff, principals, assistant principals, teachers, teaching assistants, and other staff advocate success for all students. High expectations for student performance begin with leadership and extend to all areas of the district.	$0	$0	$0	$0	$0	$0	$0
13. Closely monitor the curriculum development and curriculum management adoption process to ensure key elements are successfully implemented and result in improved student learning.	$0	$0	$0	$0	$0	$0	$0
14. Research dropout recovery and prevention strategies and apply for Texas Education Agency (TEA) grants to implement proven programs that will increase the chances of completion for every student in LISD. LISD should also expand the Success Academy to more students.	$0	$0	$0	$0	$0	$0	$0
15. Improve the rigor and focus of LISD gifted and talented (G/T) and advanced academics offerings.	($2,750)	($2,750)	($2,750)	($2,750)	($2,750)	($13,750)	$0
16. Reexamine the practice of using teaching assistants instead of certified teachers in key areas.	$0	$0	$0	$0	$0	$0	$0
17. Implement a systematic and strategic districtwide professional development plan for all instructional staff that provides differentiated learning opportunities based on staff needs and student performance data.	($12,750)	($12,750)	($12,750)	($12,750)	($12,750)	($63,750)	$0
18. Articulate high expectations for all students and respect for cultural diversity; provide community awareness about the benefits of BIL/ESL programming and appropriate identification; implement a research-based BIL/ESL program; and provide a summer school program for ELLs entering kindergarten and first grade.	$0	$0	$0	$0	$0	$0	$0

FISCAL IMPACT (CONTINUED)

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
19. Create a planning group to address the needs of LISD's special education students, especially in regard to teacher training, the use of teaching assistants, discipline, and inclusion model implementation fidelity.	($6,000)	($6,000)	($6,000)	($6,000)	($6,000)	($30,000)	$0
20. Implement Communities in Schools (CIS) to relieve the nurse, counselors, and teachers of social work functions and to help ensure that students identified as economically disadvantaged have access to all the supports they need for greater academic success.	($42,672)	($42,672)	($42,672)	($42,672)	($42,672)	($213,360)	$0
TOTALS–CHAPTER 3	**($64,172)**	**($64,172)**	**($64,172)**	**($64,172)**	**($64,172)**	**($320,860)**	**$0**

CHAPTER 4

HUMAN RESOURCES MANAGEMENT

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 4. HUMAN RESOURCES MANAGEMENT

Human Resources (HR) management is the formal structure within an organization responsible for all the decisions, strategies, factors, principles, operations, practices, functions, activities, and methods related to the management of people. HR is an important part of the district's operations because the district depends heavily on people for service delivery. HR functions generally include: compensation and benefits, staffing, and administrative planning and duties. Decisions and activities across these HR functions are driven by either compliance-based or strategic-based responsibilities.

The HR compliance-based responsibilities include assuring an organization is following federal, state, and local labor laws in areas such as benefits, compensation and hours worked, recordkeeping, mandatory leave, discrimination, medical privacy, safety, termination, and eligibility to work. Organizations are free to operate as they see fit within the parameters defined by these regulations. The HR strategic-based responsibilities include recruiting and retention, compensation/benefits, and cultivating and maintaining relationships.

To assist organizations in operating efficiently and effectively, the HR community has identified best practices proven to lower the organization's risk of litigation by assuring legal compliance and/or improve productivity. While opinions on what characterizes best practice can vary, best practices recommended in this section will be those endorsed by the Society for Human Resource Management (SHRM). SHRM is the world's largest association devoted to HR management, representing more than 250,000 members in over 140 countries.

The following exhibits provide an overview of Lamesa Independent School District's (LISD's), composition of staff by category, actual financial expenditures for staff compared to total district expenditures and average salaries for staff as compared to peer districts.

As shown in **Exhibit 4–1**, LISD auxiliary staff represents the second largest percentage of employees (29.9 percent) behind teachers (46.6 percent) according to the Texas Education Agency's (TEA's) Academic Excellence Indicator System (AEIS) for school year 2009–10.

EXHIBIT 4-1
LAMESA ISD STAFF BY CATEGORY AND PERCENTAGE OF TOTAL
SCHOOL YEAR 2009–10

CATEGORY	ACTUAL STAFF	PERCENT
Teachers	156.5	46.6%
Professional Support	11.3	3.4%
Campus Administration	9.0	2.7%
Central Administration	4.0	1.2%
Educational Aides	54.5	16.2%
Auxiliary Staff	100.5	29.9%
TOTAL STAFF	**335.8**	**100.0%**

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

Also, in school year 2009–10, the district's payroll costs have increased by 15.9 percentage points since school year 2007–08. As shown **Exhibit 4–2,** the district spent 76.3 percent or $14.4 million of $18.8 million of total actual expenditures for payroll costs in school year 2009–10**.**

Overall average salary for all personnel is the lowest compared to its peer districts. LISD teachers' average salary is second highest, while average salary for educational aides and auxiliary staff is the lowest compared to its peers as shown in **Exhibit 4–3**.

The Human Resources (HR) function in LISD is overseen by the assistant superintendent of Personnel who reports directly to the superintendent. The assistant superintendent of Personnel supervises a secretary who conducts hiring for most district employees and is in charge of the recordkeeping functions of the department. In addition, the assistant superintendent oversees the supervision of most employees such as teachers, teaching assistants, campus support staff, and campus administrators.

Payroll and benefits duties are assigned to a secretary who reports to the assistant superintendent of Finance and Operations. District staff in the Maintenance/Transportation and Food Service Departments report to their immediate director or manager who then reports to the assistant

EXHIBIT 4-2
LAMESA ISD ACTUAL FINANCIAL EXPENDITURES
SCHOOL YEARS 2007–08 TO 2009–10

	2007–08		2008–09		2009–10	
EXPENSE CATEGORY	TOTAL EXPENSES (ALL FUNDS)	PERCENT OF TOTAL EXPENSES	TOTAL EXPENSES (ALL FUNDS)	PERCENT OF TOTAL EXPENSES	TOTAL EXPENSES (ALL FUNDS)	PERCENT OF TOTAL EXPENSES
Payroll Costs	$13,322,594	60.4%	$13,843,287	72.7%	$14,359,840	76.3%
Other Operating Costs	$3,317,668	15.0%	$3,592,829	18.9%	$3,717,674	19.7%
***TOTAL EXPENSES**	**$22,058,762**	**100.0%**	**$19,051,706**	**100.0%**	**$18,830,435**	**100.0%**

*Excludes capital outlay and debt service.
SOURCE: Texas Education Agency, AEIS, school years 2007–08 to 2009–10.

EXHIBIT 4-3
AVERAGE SALARIES FOR ADMINISTRATIVE, INSTRUCTIONAL, AND SUPPORT STAFF
LAMESA ISD AND PEER DISTRICTS
SCHOOL YEAR 2009–10

POSITION	LAMESA	VENUS	CONNALLY	CENTER	SEMINOLE
All Personnel	**$32,786**	$35,278	$34,564	$34,568	$40,459
Teachers	**$43,267**	$41,132	$42,185	$41,827	$49,995
Professional Support Staff	**$51,068**	$53,836	$50,104	$52,927	$58,631
Central Administrators	**$70,726**	$70,718	$65,777	$70,346	$83,682
Campus Administrators	**$66,510**	$70,700	$64,917	$75,048	$81,700
Educational Aides	**$13,173**	$14,582	$15,887	$14,692	$19,885
Auxiliary Staff	**$19,150**	$20,544	$20,683	$20,061	$23,146

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

superintendent of Finance and Operations. **Exhibit 4–4** provides an organizational chart of HR reporting.

ACCOMPLISHMENT

- LISD district leaders have created a number of programs to help improve staff morale and engender loyalty to the district.

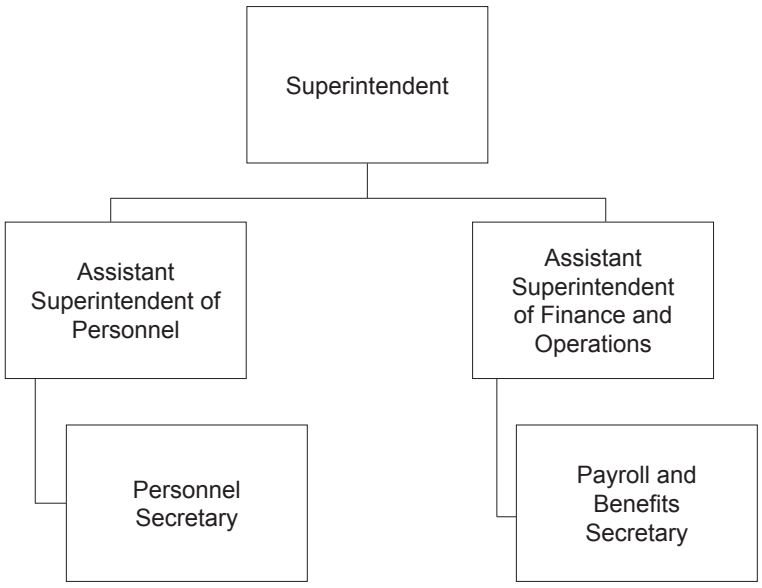
FINDINGS

- LISD's HR Department lacks an organizational structure that ensures cohesive delivery of services to district staff, an effective plan to carry out those services, and sufficient HR-related training to ensure the district is conforming with state and federal laws, rules, regulations, guidelines and best practices.
- LISD lacks a methodology to determine if HR Department tasks follow required regulations. It appears the district may have incorrectly classified some staff, may not have used appropriate formulas regarding compensation of overtime, may not have provided the needed security for personnel medical records, and does not have a comprehensive compensation plan identifying the organization's pay programs and total reward strategies.
- LISD lacks a comprehensive approach to key HR processes regarding assessing staff turnover, the use of staffing guidelines, consistent applications, up-to-date job descriptions, and employee performance evaluations.
- LISD lacks written HR Department procedures and a singular, comprehensive, and updated employee handbook.

RECOMMENDATIONS

- **Recommendation 21: Restructure the HR Department, create a plan to include HR strategies, objectives, timelines, budget information, and specific evaluation activities, and train all department staff to ensure the district is conforming to state and federal laws, rules, regulations, guidelines and best practices.**

EXHIBIT 4-4
LAMESA ISD HUMAN RESOURCES DEPARTMENT ORGANIZATION
SCHOOL YEAR 2010–11



SOURCE: Lamesa ISD, 2011.

- **Recommendation 22: Create a methodology to ensure the district follows state and federal regulations appropriately and consistently.**
- **Recommendation 23: Develop a comprehensive approach for assessing turnover, the use of staffing guidelines, consistent applications, up-to-date job descriptions, and employee performance evaluations.**
- **Recommendation 24: Develop HR departmental procedures and a singular, comprehensive, and updated employee handbook.**

DETAILED ACCOMPLISHMENT

PROGRAMS TO IMPROVE STAFF MORALE AND LOYALTY

LISD district leaders have created a number of programs to help improve staff morale and engender loyalty to the district. These programs include the following:

- Team Lamesa;
- a recruitment video;
- onsite child care program for pre-school age children;
- after-school access to the weight room and handball court;
- exercise classes;
- leave-early passes for teachers; and
- occasional relaxed-dress day (blue jeans and t-shirt).

Team Lamesa is an informal district employee effort to bring staff together for camaraderie and community projects. According to the superintendent, in 2010, district leaders decided to allow employees to choose a project to not only help staff bond but to provide a service to the community. The group chose a community beautification project. This concept continues to evolve.

In addition, LISD has developed a recruitment video in which the superintendent discusses the district's philosophy and goals. The video shares information about the community and its amenities and provides potential employees with a glimpse of the district's facilities, staff, and students. The video is posted on LISD's website and is readily available to anyone who might be considering employment in the district. In addition to its recruitment function, the video serves to help "brand" the district, making a public statement

about the values of the district and its employees, who can help build employee buy-in.

The superintendent also stated that child care was an issue for many employees, so the district began a tuition-based onsite child care program for staff approximately six years ago. The program, located on an elementary campus, is first offered to staff and if openings still exist, community members are allowed to participate. The program mostly breaks even and is currently full, serving approximately 18 children.

Finally, in fall 2010, the district also began offering opportunities that serve as morale boosters, such as after-school exercise classes and faculty and staff access to the LISD weight room and handball court. The district has also implemented options such as leave-early passes for teachers and blue jeans and t-shirt days. District staff reported that these types of programs help build camaraderie among staff, which, in turn, facilitates teamwork and retention.

DETAILED FINDINGS

HUMAN RESOURCES DEPARTMENT STRUCTURE AND PROCESSES (REC. 21)

LISD's Human Resources (HR) Department lacks an organizational structure that ensures cohesive delivery of services to district staff, an effective plan to carry out those services, and sufficient HR-related training to ensure the district is conforming with state and federal laws, rules, regulations, guidelines and best practices. The lack of a unified department structure, plan, and HR-related training, may have led to the following inconsistencies noted during the review team's visit in February 2011:

- position classifications, overtime compensation, and benefits appear to not be aligned with federal requirements;
- multiple and inconsistent employment applications;
- inaccurate and inconsistent job descriptions;
- decentralized job-posting procedures;
- inconsistent application of performance evaluations for all employees;
- lack of a comprehensive employee handbook; and
- lack of department procedures and district policies as they relate to HR functions.

ORGANIZATIONAL STRUCTURE

The review team's onsite analysis of the Human Resources Department indicated a department that is fragmented. Personnel related functions are not all conducted within the HR Department's purview. Currently, some personnel functions are split between the assistant superintendent of Personnel and the assistant superintendent of Finance and Operations. The assistant superintendent of Personnel oversees issues related to federal Title 9 regulations and HR related functions. The position manages substitute teachers, the Special Education Director and most district employees with the exception of bus drivers, maintenance/custodians, and food service personnel who indirectly report to the assistant superintendent of Finance and Operations.

While most human resources functions regarding hiring, terminations, discipline, record keeping, benefits and compensation management, are the responsibility of an HR Department, in Lamesa ISD, the Maintenance/ Transportation and Food Service Departments separately conduct their own hiring, terminations, discipline, compensation management, and performance evaluations for staff directly reporting to these departments. In an interview with the assistant superintendent of Personnel, it was stated that on a daily basis both leaders figure out who takes care of what between the two since there seems to be a cross-over of duties in relation to HR function and that "squaring those roles would be good." For example, the assistant superintendent of Personnel is responsible for all leave and absences including Family Medical Leave Act (FMLA) even for maintenance staff (who report to the assistant superintendent of Finance and Operations), while the assistant superintendent of Finance and Operations oversees worker's compensation issues.

Furthermore, the payroll/benefits secretary reports to the assistant superintendent of Finance and Operations rather than to the assistant superintendent of Personnel even though the majority of the position's duties are related to personnel matters such as; benefits, medical/COBRA insurance, W-4, Teacher Retirement System (TRS) reports, and employee payroll (notified of employee garnishments to paychecks, terminations, raises or overtime so payroll adjustments can be made).

The HR Department's disjointed structure may place the department at risk of using ineffective or inefficient processes or more importantly not following regulations required by law; therefore, the district should restructure the department and its functions to ensure staff with HR related duties are

grouped together and report to the assistant superintendent of Personnel. Additionally, communication between all staff handling personnel related tasks is critical to minimize errors.

PLANNING

Added to the department's split structure, is the lack of a departmental plan. According to district interviews, the day-to-day functions of the department are informal. The department does not engage in either long or short term planning that include HR strategies beyond immediate staffing needs, specific objectives (activities/tasks), timelines, budget information, and specified department evaluation activities.

While the district improvement plan (DIP) includes an HR-related goal, two objectives, and numerous strategies, the focus is exclusively on recruiting, employing, and maintaining a highly qualified staff and does not address efficiency of HR functions. A district improvement plan's central function is to chart a course that "guides district and campus staff in the improvement of student performance for all student groups in order to attain state standards for the state student achievement indicators;" setting goals, objectives, and strategies to help in the improvement of academics and therefore, is not meant to be used as a planning instrument to address specific departmental needs such as those lacking in LISD's HR Department.

Furthermore, the department's lack of comprehensive departmental planning or internal monitoring and evaluation of HR functions has resulted in inefficient practices and procedures. Successful planning as noted by the Society for Human Resource Management (SHRM) suggests that organizational divisions develop a guiding philosophy, conduct an environmental analysis, and create both long and short-range plans to be effective. Articulating a departmental philosophy and conducting a thorough environmental analysis provide direction and relevant data on multiple factors that may affect current and future HR Department planning. Within such plans, resources must be organized and allocated to align with the overall organizational goals and environment. An HR plan should reflect results in measurable terms with two of the most common measurements being time and budget.

HR planning consists of the following phases:

- **Formulation:** Develop a departmental vision, mission, and values.
- **Development:** Create a clear picture of the current state of the department by conducting a Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis. Some of the topics that can be included in the SWOT analysis are staff capabilities, benefit programs, employee services, information systems, office facilities, and the reputation of HR within the organization. Questions shaping the four components of the SWOT include:
  - What are the HR Department's internal strengths?
  - What are the HR Department's internal weaknesses?
  - What external opportunities would move the department forward?
  - What external threats might hold the department back?
- **Implementation:** Develop short-term objectives that need to be in place to achieve long-term strategies. Each short-term objective should include an action plan and resource allocation budget (i.e., finances, human capital, equipment, technology).
- **Evaluation:** Regular reviews and monitoring of the department's strategies are vital to the success of the plan.

LISD's HR Department should engage in a substantive planning effort**,** aligning with the districtwide strategic planning recommendation in the District Organization chapter of this report. The department should also take into consideration other findings and recommendations within this chapter of the report.

The department planning process might include the following:

- Create a steering committee of HR stakeholders;
- Gather input from the steering committee to determine the short- and long-term needs of the HR Department;
- Gather input from the steering committee to determine possible strategies for addressing short- and long-term needs;
- Review the goals of the LISD DIP;
- Review the needs and strategies recommended by the steering committee;

- Conduct a Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis for the division;
- Align the input from the steering committee and the LISD goals with the SWOT analysis;
- Use the SWOT analysis to create a short- and long-term plan for HR; and
- Ensure that the long-term plan includes goals, objectives, strategies, resources, a timeline, and an annual evaluation process.

TRAINING

From the analysis of district data by the review team, little HR-related training for staff occurs. Adequate and ongoing training is critical due to frequent changes in state and federal laws, rules, and regulations related to HR functions.

Interviews with the review team while onsite revealed limited staff training in the area of HR. When asked for a list of HR training courses, the assistant superintendent of Personnel stated that other than his resume he did not have a list of training courses with the exception of FMLA training. Annually he attends a personnel conference but noted that additional training was needed regarding Title 9 since this position oversees this area.

HR training for all personnel from leadership positions to principals and other key departmental staff is critical not only to ensure district staff understands federal and state rules and regulations but to ensure that LISD staff is more effectively and efficiently served. In addition, providing training will both facilitate the planning process as well as educate district personnel about the current HR landscape.

The assistant superintendent of Personnel should review labor and employment law information provided at no cost through the Department of Labor (www.dol.gov), the Equal Employment Opportunity Commission (www.eeoc.gov), and the Texas Workforce Commission (www.twc.state.tx.us). While LISD does have a labor law attorney on retainer, it is incumbent upon the assistant superintendent of Personnel to ensure the district follows regulatory guidelines on a day-to-day basis and assess when outside legal services might be needed.

In summary, the district should restructure the HR Department, create a plan to include HR strategies, objectives, timelines, budget information, and specific evaluation activities, and train all department staff to ensure the district is conforming to state and federal laws, rules, guidelines and best practices. The district should also invest in a $180 yearly membership in the Society for Human Resource Management. Membership includes written materials and access to toolkits that provide guidance in developing key HR processes, such as compensation systems, as well as a library of webinar training videos (www.shrm.org). Other needs for training may be discovered through the SWOT analysis.

The total fiscal impact is estimated at $900 over five years ($180 per yearly membership x 5 years = $900).

CLASSIFICATION, COMPENSATION, AND BENEFITS (REC. 22)

LISD lacks a methodology to determine if HR Department tasks follow required regulations. It appears the district may have incorrectly classified some staff, may not have used appropriate formulas regarding compensation of overtime, may not have provided the needed security for personnel medical records and does not have a comprehensive compensation plan identifying the organization's pay programs and total reward strategies.

In order to provide protection for employees, the classification, compensation, and benefits functions of HR are highly regulated by federal and state law. It is, therefore, necessary that employers be fully knowledgeable about federal and state legal requirements, which are frequently updated.

Based on a review of a sample of district records, observations and interviews by the review team, LISD does not appear to have a method to ensure the district is following federal and state regulations concerning the following areas:

- Classification of employee positions according to the Fair Labor Standards Act (FLSA);
- Paying minimum wage to non-certified substitute teachers;
- Appropriately computing overtime for employees working two or more positions;
- Securing protected health information as required by the Health Insurance Portability and Accountability Act (HIPAA); and
- A comprehensive compensation plan identifying the organization's pay programs and total reward strategies.

Each area identified above will be discussed in detail in the sections that follows.

EMPLOYEE CLASSIFICATION

During the review team's onsite visit, the assistant superintendent of Personnel and the secretary of Payroll/ Benefits indicated that the district has two payroll systems in place—one for exempt employees and one for non-exempt employees—and that compensatory time is rarely used. The review team's examination of a sample of employee records provided by the district indicated that teaching assistants, secretaries, and computer technicians appear to be on the exempt payroll. These positions are classified as exempt in LISD, meaning not due overtime, but should be classified as non-exempt (due overtime) and thus appear to be misclassified according to the Fair Labor Standards Act (FLSA).

The FLSA establishes minimum wage, overtime pay, recordkeeping, and child labor standards affecting full-time and part-time workers in the private sector and in federal, state, and local governments. The Wage and Hour Division (WHD) of the U.S. Department of Labor (DOL) administers and enforces the FLSA. A 2004 FLSA amendment clarifies exemptions for executive, administrative, professional, computer, and outside sales employees. To qualify for exemptions, employees generally must meet certain tests regarding their job duties and be paid on a salary basis of not less than $455 per week ($23,660 a year).

The following provides a summary assessment, based on FLSA regulations of whether the employee positions of teaching assistant, secretary, and computer technician (as defined in LISD job descriptions or through observation) fall within the definition of an exempt employee.

TEACHING ASSISTANT

LISD's position description for Classroom Teaching Assistant says the teaching assistant assists the teacher in the preparation and management of classroom activities and administrative requirements. Teaching assistants work under the supervision of a certified teacher. In order for a teaching assistant to be exempt, he/she would have to qualify under the "learned professional position" exemption. The primary duties test for the learned professional position is listed as follows:

- The employee's primary duty must be the performance of work requiring advanced knowledge, defined as work, which is predominantly intellectual in character and which includes work requiring the consistent exercise of discretion and judgment;
- The advanced knowledge must be in a field of science or learning; and
- The advanced knowledge must be customarily acquired by a prolonged course of specialized intellectual instruction.

In addition, the DOL states that "teachers are exempt if their primary duty is teaching, tutoring, instructing or lecturing in the activity of imparting knowledge, and if they are employed and engaged in this activity as a teacher in an educational establishment. Exempt teachers include, but are not limited to, regular academic teachers; kindergarten or nursery school teachers; teachers of gifted or disabled children; teachers of skilled and semi-skilled trades and occupations; teachers engaged in automobile driving instruction; aircraft flight instructors; home economics teachers; and vocal or instrument music teachers. The salary and salary basis requirements do not apply to bona fide teachers. Having a primary duty of teaching, tutoring, instructing or lecturing in the activity of imparting knowledge includes, by its very nature, exercising discretion and judgment."

This analysis suggests that teaching assistants may not meet the DOL's definition of a learned professional. LISD should evaluate the teaching assistant position's roles and responsibilities to evaluate the classification of the position, determine if overtime is due, and if necessary, make corrections when relevant.

SECRETARY

DOL indicates that the administrative employee's primary duty must include the exercise of discretion and independent judgment with respect to matters of significance in order to be exempt from overtime requirements. Executive or administrative assistants to a business owner or senior executive of a large business generally meet this requirement if the employee, without specific instructions or prescribed procedures, has been delegated authority regarding matters of significance. However, this exemption is generally not expanded to include secretaries or other clerical employees.

Further, DOL defines the administrative exemption for educational establishments and administrative functions as follows:

"available to employees compensated on a salary or fee basis at a rate not less than $455 a week, or on a salary basis which is at least equal to the entrance salary for

teachers in the same educational establishment, and whose primary duty is performing administrative functions directly related to academic instruction or training in an educational establishment. Academic administrative functions include operations directly in the field of education, and do not include jobs relating to areas outside the educational field. Employees engaged in academic administrative functions include: the superintendent or other head of an elementary or secondary school system, and any assistants responsible for administration of such matters as curriculum, quality and methods of instructing, measuring and testing the learning potential and achievement of students, establishing and maintaining academic and grading standards, and other aspects of the teaching program; the principal and any vice-principals responsible for the operation of an elementary or secondary school; department heads in institutions of higher education responsible for the various subject matter departments; academic counselors and other employees with similar responsibilities. Having a primary duty of performing administrative functions directly related to academic instruction or training in an educational establishment includes, by its very nature, exercising discretion and independent judgment with respect to matters of significance."

In 2006, DOL further clarified the administrative position for clerical staff in a position letter.

While up-to-date position descriptions for LISD secretaries do not exist, a review of existing position descriptions for a secretary may not indicate secretaries perform exempt work. The district should conduct an analysis of a secretary's duties and responsibilities to ensure the appropriate classification of the position and if necessary, make corrections when relevant.

COMPUTER EMPLOYEE

To qualify for the computer employee exemption, the following tests must be met:

- The employee must be employed as a computer systems analyst, computer programmer, software engineer, or other similarly skilled worker in the computer field performing the duties described below. The employee's primary duty must consist of:
  - the application of systems analysis techniques and procedures, including consulting with users, to determine hardware, software, or system functional specifications;
  - the design, development, documentation, analysis, creation, testing, or modification of computer systems or programs, including prototypes, based on and related to user or system design specifications;
  - the design, documentation, testing, creation, or modification of computer programs related to machine operating systems; or
  - a combination of the aforementioned duties, the performance of which requires the same level of skills.

The computer employee exemption, according to DOL, does not include employees engaged in the manufacture or repair of computer hardware and related equipment. Employees whose work is highly dependent upon, or facilitated by, the use of computers and computer software programs (e.g., engineers, drafters, and others skilled in computer-aided design software), but who are not primarily engaged in computer systems analysis and programming or other similarly skilled computer-related occupations identified in the primary duties test described above, are also not exempt under the computer employee exemption.

While there is no position descriptions for the LISD computer technicians, observation of their work indicated they were primarily engaged in computer/technical support specialist activities. According to the Bureau of Labor Statistics' *Occupational Outlook Handbook, 2010–11 Edition*, "Technical support specialists respond to inquiries from their organizations' computer users and may run automatic diagnostics programs to resolve problems. In addition, they may write training manuals and train computer users in the use of new computer hardware and software. These workers also oversee the daily performance of their company's computer systems, resolving technical problems with Local Area Networks (LAN), Wide Area Networks (WAN), and other systems."

This analysis suggests LISD computer technicians may not meet the definition of an exempt computer technician. The district should conduct an analysis of duties and responsibilities of computer technicians to determine the appropriate classification of these employees and if necessary make corrections when relevant.

OVERTIME CALCULATIONS

Based on a review of a sample of records, LISD may not be appropriately calculating overtime for individuals working two or more different positions.

The DOL states that when an employee works at two positions for which different hourly rates apply, the employee's regular rate for that week is the weighted average of the two rates. Total earnings at the various rates are divided by the total number of hours worked for the week. It is upon this weighted average rate that overtime should be calculated. LISD may be using the minimum wage to calculate the overtime due. **Exhibit 4–5** illustrates an example of an appropriate overtime calculation compared to LISD's current method of calculation.

The district should conduct a review of district calculations used in the computation of overtime for individuals working two or more different positions and if necessary make corrections when relevant.

HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA)

Observations during the onsite visit indicated that LISD may not be following regulations associated with the Health Insurance Portability and Accountability Act (HIPAA). At the time of the onsite review in February 2011, employee medical records were kept in the payroll office, the maintenance and transportation offices, a walk-in vault, and long-term storage. The payroll office did not have a lock on any of the file cabinets containing medical information or on the door to the office. Additionally, the door of the personnel secretary's office did not lock, nor did the door to the long-term storage area.

LISD is required to follow HIPAA regulations because it offers employees a health plan benefit. HIPAA requires that employees' medical information be kept confidential and that private health information (PHI) be secured. PHI is *"Individually identifiable health information,"* including demographic data that relate to the following:

- the individual's past, present, or future physical or mental health or condition;
- the provision of health care to the individual; or
- the past, present, or future payment for the provision of health care to the individual that identifies the individual or for which there is a reasonable basis to believe can be used to identify the individual. Individually identifiable health information includes many common identifiers (e.g., name, address, birth date, social security number).

EXHIBIT 4-5
APPROPRIATE CALCULATION OF OVERTIME FOR SAMPLE LISD EMPLOYEE
WORKWEEK BEGINNING 2/2/2011

JOBS PERFORMED	RATE	HOURLY RATE	DAYS WORKED	HOURS WORKED	STRAIGHT PAY
Regular bus route	$46/day		3.5	8.5	$161.00
Tutorial bus route	$10/day		3.0	3.0	$30.00
Custodial work		$10.52		18.0	$189.36
Extra trip driving		$7.25		25.5	$184.88
TOTAL HOURS				**55.0**	
TOTAL STRAIGHT TIME PAY					**$565.24**
CORRECT OVERTIME CALCULATION					
Regular Rate (RR) for Overtime			RR = Total Compensation ÷ Total Hours Worked ($ 565.24 ÷ 55) =		$10.28
			Overtime due = RR x overtime premium x # overtime hours worked		
			(10.28 x 0.5 x 15) =		**$77.10**
LISD OVERTIME CALCULATION			(7.25 X 0.5 X 15) =		**$54.38**
Gross Overtime Pay Due Employee			($77.10 - $54.38) =		**$22.72**

SOURCE: Interview notes and Lamesa ISD records Work Week 2/2/2011, Wage and Hour Field Handbook.

COMPENSATION AND BENEFITS

LISD has not articulated in writing a comprehensive compensation plan that identifies the organization's pay programs and total reward strategies. While LISD has a salary administration plan for teachers, the district does not have a similar plan for non-teaching employees, who comprise the majority of district employees. Without a documented (written) compensation plan the administration may be at risk for employment discrimination or favoritism in salary administration.

In addition, LISD has not set salary ranges for various types of employees. For instance, there is no maximum or minimum set pay for secretaries. This means a secretary, who has worked for the district for 40 years, with an annual salary increase, could be making as much or more than a veteran teacher. However, his/her skills on the open market may not be worth as much as he/she is being paid.

An organization with 50 employees or more is required to comply with at least 20 federal labor laws and numerous state and local laws just in the area of compensation. According to industry standards, LISD would be considered a medium-sized (101–500 employees) employer, with requirements for a formal HR function with a focus on compensation.

Compensation plans should be based on market research regarding the various types of district employees. Interview data indicated that the district may not have conducted market surveys about salaries of non-teaching staff. A sample review of employee records and interviews indicated that most of the non-teaching employees in LISD are started at minimum wage.

Refraining from conducting market studies on non-teaching employee salaries, LISD could be less able to attract good employees to its organization. Furthermore, paying low wages can also raise productivity issues.

Upon investigation of these and other aspects of compensation, the district may determine that it can handle the compensation function of HR in-house by building the capacity of one or more staff members. If so, training is available from groups such as the Texas Association of School Boards HR Services, the Texas Association of School Personnel Administrators, and the Society for Human Resource Management. Whatever route is taken, one-time training is not satisfactory, and it must be undertaken on an ongoing basis.

To help a district evaluate its needs and identify a direction for improving the HR function, **Exhibit 4–6** provides a list of questions which may serve as a brief guide on legal requirements and additional best practices.

In summary, concerns about employee classifications, minimum wage payment, overtime calculations, and the lack of a comprehensive compensation plan with market studies suggest a need for LISD to create a methodology to ensure the district follows state and federal regulations appropriately and consistently.

The district should make certain that HR staff has detailed knowledge of constantly changing laws, rulings, and agency interpretations requires ongoing education for staff involved in personnel functions. This can be burdensome for a small school district like LISD; however, best practice models provide options.

Employment regulations are often difficult to understand or interpret, and can be difficult to keep up with changes and amendments. Best practice research indicates that for an organization the size of LISD, a trained expert on staff or on call would be highly beneficial. Specifically, for an organization the size of LISD, an onsite expert might be an HR generalist with individuals or teams who work in specific HR areas. The district currently contracts with an attorney, and one option may be to expand the use of the attorney's services to include HR concerns documented in this review. Expansion of the attorney's services in this area could also provide the district with a high level of confidence in answers to its questions concerning regulatory guidelines. Supervisors, who have the most employee contact, then would have a direct route to expert advice, reducing the district's liability for poor employment practices.

The district should also develop written HR policies and procedures that comply with state, federal, and local law. These should be developed either by a trained HR specialist who is a district employee or an external on-call HR services provider contracted by the district (either an attorney or contracted HR specialist) who can provide a level of expertise beyond what exists in the district. Whether on staff or on call, an HR expert would be instrumental in delineating processes, documenting them, ensuring their appropriate implementation, communicating them to all staff and supervisors, and suggesting modifications as needed. A cost for an HR specialist cannot be determined at this time until the district has made a decision about contracting externally

EXHIBIT 4-6
EVALUATING HUMAN RESOURCES FUNCTIONS
QUESTIONS FOR DISTRICTS TO CONSIDER

HR FUNCTIONS	QUESTIONS TO CONSIDER
Pay processes	How are jobs classified as exempt versus nonexempt? To what extent is the process legally compliant? (See http://www.dol.gov/esa/whd/flsa/.) What is the annual increase process? How are increases determined: tenure, performance, skill-based? Who is responsible?
Consistent pay standards	Is equal pay provided for equal work? Are pay rates both externally and internally equitable? Are pay rates competitive? Does the district comply with laws when paying current and terminated employees? Are there procedures for recommending and approving salary adjustments?
Compensation system	Is there a system of formal salary structures that sets pay rates for each job? How is outstanding or exceptional performance recognized and rewarded? What is the formal salary budget process?
Incentive plans	Are there bonuses or incentive payouts? Are there written documents describing how incentive plans operate? Is incentive information communicated to employees? Is there a formal program to measure actual performance for short-term incentive purposes?
Time management	How is time recorded and monitored? Is there an attendance policy and procedure? Is there a no-call/no-show policy? How is payroll notified of excessive absenteeism? Is there a reward for good attendance?
Paid time off	Is there a policy regarding paid time off, vacations, holidays, sick days, personal days? Is there an accrual policy or system for paid time off?
Leaves of absence	Is there a stated leave of absence policy? What does it cover? How do employees apply for leave? Who must approve leaves? How are leaves tracked? Is there compliance with laws pertaining to military leave, family and medical leave, pregnancy leave, disability leave, workers compensation leave?
Optional insurance benefits	What benefits are provided: health, life, dental, vision, employee assistance program, disability? How are they tracked? Which are district provided and which are voluntary? When do benefits become effective? What premium contributions are required of employees? Who is eligible for coverage? Are there summary plan descriptions? Are flexible benefits offered? Is the district in compliance with COBRA requirements? (See http://www.dol.gov/dol/topic/health-plans/cobra.htm.)

SOURCE: Why Small- and Medium-Sized Organizations Really Do Need an HR Function: A Society for Human Resource Management (SHRM) White Paper, Mathews & Hartman, 2006.

for a specialist or assigning the task internally to an existing district employee.

In addressing HR functions, immediate priorities include a review of federal and state regulations on classification/compensation practices and the need to conform to HIPAA privacy requirements, and any other employee medical information, such as benefits, return-to-work slips, workers compensation, and family medical leave information, needs to be secured. Medical information not in long-term storage should be kept separately from personnel files. LISD should ensure files are protected by installing locks on cabinets and doors. File cabinet bars can be purchased for approximately $20 to $30 each, while keyed door knobs can be purchased for approximately $25 each. Total cost for retrofitting is a one-time cost of approximately $240 [$90 ($30 per file cabinet bar x 3 bars) + $150 ($25 per keyed door knobs x 6 knobs)].

Costs of implementing this recommendation may vary greatly. As part of the strategic planning process recommended in this chapter, LISD might make a number of changes in its HR function that cannot be anticipated or quantified as part of this management review but costs would likely involve staffing, training, or contracted services. LISD is already a member of the Texas Association of School Boards (TASB) HR group and already has an attorney to assist with HR matters.

HUMAN RESOURCES STAFFING FUNCTION (REC. 23)

LISD lacks a comprehensive approach to key HR processes regarding assessing staff turnover, the use of staffing guidelines, consistent applications, up-to-date job descriptions, and employee performance evaluations.

ASSESSING TURNOVER

Determining the reasons for a department's turnover is critical in assessing what went wrong and where improvements can be made in order to retain staff. One key way to determine reasons a department is losing staff is to conduct exit interviews. District officials indicated to the review team that Lamesa ISD does not consistently conduct exit interviews with departing staff. Consequently, the exact reasons for the turnover in the Maintenance/Transportation and Food Service Departments, where in school year 2009–10 the

district experienced from more than 30 percent to 125 percent turnover, cannot be determined. Management staff in these departments identified possible causes for the high turnover in these positions, as a "poor work ethic" and the late hours (11:30 PM) required of second-shift custodians.

Turnover rates shown in **Exhibit 4–7** for staff in the Maintenance/Transportation and Food Service Departments used an estimated calculation of the number of separations for each category in school year 2009–10 divided by the number of employees and their average rate of pay in each category. A turnover cost per employee of 25 percent of total salary and benefits was used as an estimate to conservatively determine potential cost to the district when these types of staff leave.

A contrast of turnover rates in Lamesa ISD to other districts cannot be determined since this type of data is only available to each district and is not published by the Texas Education Agency. A comparison with, total turnover in the United States, in all industries, in 2009 was 16.3 percent.

STAFFING GUIDELINES

Once a district assesses the reasons staff leave, the next step in the process is to determine whether there is a need to hire staff to take their place or not. To determine this, many districts depend on staffing guidelines to ensure whether a department is over or understaffed.

While onsite, interviews with district administration indicated that the district does not use staffing guidelines to determine the number of staff that are needed as the student population increases or decreases and as personnel leave or retire throughout the district. Lamesa ISD, therefore, does not engage in a systematic current workforce assessment and projected workforce needs. **Exhibit 4–8** provides information on staff classifications as a percentage of the district's total staff and percentage of total compared to Region 17 and the state for school year 2009–10.

As indicated in **Exhibit 4-8**, teachers in Lamesa ISD comprise less than 50 percent of total staff compared to the state average of 50.5 percent and 54.4 percent in Region 17. In addition, the district has more educational aides (16.2 percent) and auxiliary staff (29.9 percent) compared to the state and Region 17 and fewer professional support positions (3.4 percent).

Further, over the last five school years, from school year 2005–06 to 2009–10, the district has not only lost 5.6 percent of its students but also lost 2.4 percent of teachers and 21.5 percent of professional support while staff increased in the area of campus administration, educational aides and auxiliary positions as shown in **Exhibit 4–9**.

District officials in many districts rely on a method to determine the need for more staff. This method may be to use staffing ratio guidelines based on industry standards, state mandated ratios, or self-developed ratio guidelines using their own policies and formulas. An ad hoc approach may be too expensive since staff is the largest expense in a district's budget. In the case of Lamesa ISD, in school year 2009–10, the district's total payroll expense was 76.3 percent of the district's total budget. The lack of staffing guidelines may place a district like Lamesa ISD at risk of hiring more staff in areas where they are not needed or failing to hire staff

EXHIBIT 4-7
LAMESA ISD TURNOVER RATES AND COSTS FOR MAINTENANCE, TRANSPORTATION, AND FOOD SERVICE
SCHOOL YEAR 2009

POSITION	EES PER POSITION AS OF 1/11	EES LOST	PERCENT TURNOVER	AVERAGE RATE OF PAY	TIME WORKED	YEARLY SALARY	AVERAGE BENEFITS PAID BY LISD	TURNOVER COSTS PER EMPLOYEE: 25% OF WAGES AND BENEFITS	2009–10 TURNOVER COST FOR POSITION
Maintenance	9	3	33%	$13.74/hr	2080 hrs	$28,579	$4,300	$8,220	$24,660
Bus Drivers	13	6	46%	$44.33/day	180 days	$7,979	$4,300	$3,070	$18,420
Custodians	26	9	35%	$8.83/hr	2080 hrs	$18,366	$4,300	$5,667	$51,003
Food Service	20	25	125%	$8.22/hr	180 days	$11,836	$4,300	$4,034	$100,850
TOTAL TURNOVER COST									**$194,933**

NOTE: EES = Employees.
SOURCE: Lamesa ISD Records, 2009–10.

EXHIBIT 4-8
STAFF BY CATEGORY, NUMBER, AND PERCENTAGE OF TOTAL
SCHOOL YEAR 2009–10

	LAMESA ISD		REGION 17	STATE
STAFF	FULL-TIME EMPLOYEES	PERCENT	PERCENT	PERCENT
Teachers	**156.5**	**46.6%**	54.4%	50.5%
Professional Support	**11.3**	**3.4%**	8.0%	8.9%
Campus Administration	**9.0**	**2.7%**	3.1%	2.8%
Central Administration	**4.0**	**1.2%**	1.4%	1.0%
Educational Aides	**54.5**	**16.2%**	14.4%	9.8%
Auxiliary Staff	**100.5**	**29.9%**	18.7%	27.0%
TOTAL STAFF	**335.8**	**100.0%**	**100.0%**	**100.0%**

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

EXHIBIT 4-9
LAMESA ISD STUDENT AND STAFF COUNTS, FIVE-YEAR TREND
SCHOOL YEAR 2005–06 TO 2009–10

STAFF	2005–06	2006–07	2007–08	2008–09	2009–10	PERCENT CHANGE
Teachers	160.3	160.7	155.8	156.8	156.5	-2.4%
Professional Support	14.4	16.6	16.6	15.2	11.3	-21.5%
Campus Administration	7.6	7.7	9.7	8.7	9.0	18.4%
Central Administration	4.0	4.0	4.0	2.0	4.0	0.0%
Educational Aides	50.0	52.6	60.4	61.6	54.5	9.0%
Auxiliary Staff	94.0	95.7	93.5	93.6	100.5	6.9%
TOTAL STAFF	**330.3**	**337.3**	**340.0**	**337.9**	**335.8**	**1.7%**
TOTAL STUDENTS	**2,038.0**	**2,038.0**	**2,003.0**	**1,942.0**	**1,924.0**	**-5.6%**

SOURCE: Texas Education Agency, AEIS, 2005–06 to 2009–10.

in the appropriate areas where there is a need. In addition, a decreasing student population coupled with an increasing or static staff population may signal an impending financial concern for a district. Districts not using some form of staffing guidelines need to be vigilant of their needs and possible limited resources.

APPLICATIONS AND POSTING AVAILABLE POSITIONS

As a district transitions from determining how many staff members are needed each school year to the actual hiring process, it is important to ensure applications are consistent and follow any regulations specified in state or federal rules.

In terms of application procedures, LISD uses a variety of applications and application formats for employment depending on the department. For example, the Maintenance/Transportation Department has developed its own application for employment which in contrast is different from the application used by Central Office for secretarial and teaching assistant positions. Additionally, the district uses an electronic application for professional staff.

Together with the lack of a standard employment application, a sample of some of the LISD applications reviewed during the review team's onsite work included job requirement descriptions that were inconsistent with other district documents and questions that may place the district at risk. The following examples reflect potentially inappropriate requirements and/or questions that may open the district to possibilities of discrimination claims since in some cases, applicants may question if requirements are relevant/critical to job performance. In other applications, the application requests potentially sensitive information. For example, at least one application (building maintenance) specifically asks: "What year and school did you receive your diploma or GED from?" Additionally, both the building maintenance position description and the bus driver essential duties and responsibilities statement indicate that a high school diploma

or General Equivalency Diploma (GED) is required however the administrative employee handbook does not indicate a bus driver must have a high school diploma or GED. Additionally, the application contains a question-and-answer portion designed to test the simple mathematics skills needed for the position as well as problem-solving abilities and work ethic. In these cases, applicants could question if requirements are necessary for the job function.

Yet as another example of questions asked in applications that may put the district at risk is that of the building maintenance application where question ten asks, "Have you missed any work on a prior job due to a work-related injury? If so, please explain." Federal regulation prohibits employers from asking about job-related injuries or workers' compensation history.

Without a standard application and an assessment by the district as to the relevance of certain questions or statements of job description requirements within some applications, the district may leave itself open for risk of potential litigation claims.

The district should also review SHRM guidelines for creating standardized job applications with accurate job requirements (*Guidelines on Interview and Employment Application Questions*, September 1, 2010). Key recommended features include standardized language that reduces organizational risk such as authorization to conduct background checks, consequences of falsification of information, and a thorough employment history section. It is also recommended that employers provide evidence that a position requirement is job-related. LISD can better follow ADA regulations by removing any pre-employment questions relating to medical conditions from its employment application.

Finally, in terms of advertising positions, LISD has no policy for posting open positions. Most positions are posted, but not all, according to interviews. Staff reported that there is no centralized location for posting positions and the district has no policy on the length of time an employment application is kept active. The inconsistent job-posting process and not having a standard timeframe that applications will be kept on file may create unnecessary risk for the district and may limit the district's ability to ensure that the best qualified pool of applicants saw the posting and were able to submit an application.

According to best practices, a job posting should remain displayed in a prominent place for a specified number of days. The most important consideration when using a job posting system is to be fair and consistent. An organization should generally not accept an application from any person unless it has an open position for which the organization is actively recruiting and should not retain unsolicited resumes. To systematize position posting processes, LISD should post all open positions (internal and external) in central locations, such as the district office lobby, the district's website, Region 17, and through the Texas Workforce Commission (TWC). Additionally, the district should determine the length of time to keep applications to minimize organizational risk and reach a larger applicant pool.

JOB DESCRIPTIONS

Job descriptions, whether they are part of an application or stand alone documents that indicates job expectations and or responsibilities, should be reviewed and updated periodically to ensure they remain relevant to the actual tasks employees are performing. A review of position descriptions currently archived in the Lamesa ISD's HR Department indicated that there are some positions, like those in the Technology Department, for which job descriptions are not available, and where others are not dated or outdated. District administrative staff confirmed to the review team that job descriptions have not been reviewed at least "in the past three years and some longer than that."

Accurate job descriptions are essential in the hiring process to ensure that job announcements reflect necessary skill sets and can be used to screen applicants for the final applicant interview pool. If job descriptions are not accurate, new employees may not fully understand their full set of responsibilities and/or their roles in the organization. According to the Society for Human Resource Management (SHRM), "job descriptions have the potential to become the subject of contention, including grievances or litigation." Further, appropriate compensation comparisons cannot be completed without the thorough, accurate understanding of a position and may be a necessary tool for supervisors to use when counseling an employee about job effectiveness and/or setting individual employee goals.

According to SHRM, an effective job description includes the following components:

- Date—when a job description was written (updated);
- Job status—exempt or nonexempt under FLSA, full-time or part-time;
- Position title—name of the position;

- Objective of the position—what the position is supposed to accomplish, how it affects other positions and the organization;
- Supervision received—to whom the person reports;
- Supervisor responsibilities—direct reports, if any, and the level of supervision;
- Job summary—an outline of job responsibilities;
- Essential functions—detailed tasks, duties, and responsibilities;
- Competency or position requirements—knowledge, skills, and abilities;
- Quality and quantity standards—minimum levels required to meet the job requirements;
- Education and experience—required levels;
- Time spent performing tasks—percentages, if used, should be distributed to equal 10 percent;
- Physical factors—type of environment associated with job, indoor/outdoor;
- Working conditions—shifts, overtime requirements as needed; and
- Unplanned activities—other duties assigned.

The assistant superintendent of Personnel should create a schedule and assign a person responsible for annually reviewing and updating position descriptions. The review process might include a job analysis, which is a process of gathering, examining, and interpreting data about the job's tasks. Some suggestions for performing this analysis include the following:

- Interview employees to find out exactly what tasks are being performed;
- Observe how tasks are performed; and
- Have employees fill out questionnaires or worksheets.

EMPLOYEE EVALUATIONS

Following a review of a sample of HR records, employee files, and data collected by the school review team, it appears that while a majority of district employees are evaluated on a routine basis, employees in the Maintenance/Transportation Department may not have been evaluated routinely.

According to Board Policy DN (LOCAL) Performance Appraisals, as shown in **Exhibit 4–10**, indicates "each employee shall have at least one evaluative conference annually, except as otherwise provided by policy, to discuss the written evaluation and may have as many conferences about performance of duties as the supervisor deems necessary."

EXHIBIT 4-10
EMPLOYEE EVALUATION EXCERPTS
LAMESA ISD EMPLOYEE HANDBOOK
SCHOOL YEAR 2010–11

General Principles	All District employees shall be periodically appraised in the performance of their duties. The District's employee evaluation and appraisal system shall be administered consistent with the general principles set out below.
Criteria	The employee's performance of assigned duties and other job-related criteria shall provide the basis for the employee's evaluation and appraisal. Employees shall be informed of the criteria on which they will be evaluated.
Performance Review	Evaluation and appraisal ratings shall be based on the evaluation instrument and cumulative performance data gathered by supervisors throughout the year. **Each employee shall have at least one evaluative conference annually,** except as otherwise provided by policy, to discuss the written evaluation and may have as many conferences about performance of duties as the supervisor deems necessary. [See also DNA and DNB.]
Documentation And Records	Appraisal records and forms, reports, correspondence, and memoranda may be placed in each employee's personnel records to document performance.
Employee Copy	All employees shall receive a copy of their annual written evaluation.
Complaints	Employees may present complaints regarding the evaluation and appraisal process in accordance with the District's complaint policy for employees. [See DGBA.]

SOURCE: Lamesa ISD Employee Handbook, 2010–11.

Finally, performance appraisals increase organizational effectiveness. Without a consistent performance appraisal process, LISD lacks the information needed to assess alignment with the district's mission, individual and group productivity, employee development, and employee satisfaction. Additionally, performance appraisals protect employers from risk. Annual evaluations ensure that both exceptional and ineffective performance is documented and provides the district with valuable information for assessing training and staffing needs.

The district should evaluate all employees routinely and provide formal feedback on an annual basis.

The combined impact of issues regarding LISD's staffing functions from assessing turnover through the hiring and evaluation of employees has the potential of reducing organizational effectiveness if the district does not ensure consistent and careful processes are in place to minimize district risk regarding employment of staff. Therefore, the district should develop a comprehensive approach for assessing turnover, the use of staffing guidelines, consistent applications, up-to-date job descriptions and employee performance evaluations. Within each section of this finding, suggestions have been made to ensure a more efficient and effective process.

This recommendation can be implemented with existing resources.

PROCEDURES AND EMPLOYEE HANDBOOKS (REC. 24)

LISD lacks written HR Department procedures and a singular, comprehensive, and updated employee handbook. Currently the HR Department does not have a departmental procedures manual with well-written, accurate, and up-to-date documentation for experienced or new staff to consistently follow. Such manuals provide a wealth of information on day-to-day processes within a department to ensure institutional knowledge is documented and can be easily followed by a temporary employee or new staff member when staff either retire or take leave for an extended period of time due to illness or other circumstances.

Coupled with a lack of documented HR departmental procedures is the lack of a comprehensive and updated employee handbook that district staff can rely on regarding district processes, available services, employee benefits, time accounting information, and relevant information on state and federal regulations.

During the review team visit in February 2011, the district had the following employee handbooks:

- a food services employee handbook;
- a bus drivers employee handbook;
- a 2010–11 Employee Handbook; and
- several safety handbooks.

Collectively the handbooks lack comprehensive and updated information. For example, the current 2010–11 Employee Handbook describes reasons family medical leave can be taken, but does not mention time off to care for an injured member of the military. Moreover, the Code of Ethics for Educators also located in the teachers/administration handbook does not include standards 3.8 and 3.9 of the Texas Administrative Code Title 19 that addresses appropriate professional educator-student relationships and inappropriate communication with a student or minor. Further, the handbook does not include information on military leave under the *Uniformed Services Employment and Reemployment Rights Act*, or information for nursing mothers.

Yet another example of an outdated handbook is that of the bus driver employee handbook. All board policies included in the handbook are from 1995. For example, policy updates for DBBA (LEGAL), which was replaced by DHE (LEGAL) in 2008, are not included. DBBA (LOCAL) replaced by DHE (LOCAL) in 2006, also was not reflected in the handbook. These policies govern drug and alcohol testing for employees in the district. Finally, the section on the attendance incentive does not reflect current practice for determining the amount employees are eligible to receive. During interviews with the review team, the Maintenance Director indicated the handbook had not been updated in a "long time."

An effective employee handbook should inform employees of their employer's policies and benefits and familiarize employees with various matters affecting the employment relationship. According to best practices identified by SHRM, "An employee handbook can be a valuable communication resource for the employer and the employee that provides guidance and information related to the company's history, mission, values, policies, procedures, and benefits in a written format. It is also viewed as a means of protecting the company against discrimination or unfair treatment claims. It is an easily accessible guide to the company's policies and practices as well as an overview of the

expectations of management." A handbook that is out of date will not fulfill this mission.

SHRM further states that "topics included in the employee handbook should cover the company's mission statement, equal employment opportunity statement, contractual disclaimer and at-will statement, purpose of the employee handbook, and background information on the company. The decision on additional topics is left to the employer. Important topics to consider for inclusion are legal mandates for federal and state laws that affect employees, such as the Family and Medical Leave Act, COBRA, EEOC antidiscrimination laws, Americans with Disabilities Act and Fair Labor Standards Act. If an employer fails to communicate these in the employee handbook, there may be confusion and noncompliance with the laws."

To address these issues, LISD should develop HR departmental procedures and a singular, comprehensive, and updated employee handbook. First, the district should create an HR Department procedures manual that includes processes for hiring, performance evaluations, investigating allegations of discrimination and harassment, records management, and the grievance process. Some professional organizations like the Texas Association of School Boards (TASB) can provide guidance on developing and maintaining a Human Resources Procedures Manual.

Finally, the HR Department under the guidance of the assistant superintendent of Personnel should consolidate and update its employee handbooks to one singular employee handbook that is comprehensive in nature covering processes and procedures from all departments within the district to include important and relevant state or federal regulations that impact LISD personnel. Many districts update their employee handbook on an as-needed basis to reflect changes in operating procedures or board policies. The district may want to obtain copies of employee handbooks that have been recently updated from other school districts like Katy ISD who has successfully combined necessary information for all departments into one employee handbook. Additionally, a sample table of contents can be found in the SHRM article, *How to Develop an Employee Handbook*, as well as in other areas of the SHRM website.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 4: HUMAN RESOURCES MANAGEMENT							
21. Restructure the HR Department, create a plan to include HR strategies, objectives, timelines, budget information, and specific evaluation activities, and train all department staff to ensure the district is conforming to state and federal laws, rules, regulations, guidelines and best practices.	($180)	($180)	($180)	($180)	($180)	($900)	$0
22. Create a methodology to ensure the district follows state and federal regulations appropriately and consistently.	$0	$0	$0	$0	$0	$0	($240)
23. Develop a comprehensive approach for assessing turnover, the use of staffing guidelines, consistent applications, up-to-date job descriptions, and employee performance evaluations.	$0	$0	$0	$0	$0	$0	$0
24. Develop HR departmental procedures and a singular, comprehensive, and updated employee handbook.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 4	**($180)**	**($180)**	**($180)**	**($180)**	**($180)**	**($900)**	**($240)**

CHAPTER 5

FACILITIES USE AND MANAGEMENT

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 5. FACILITIES USE AND MANAGEMENT

Texas school districts are challenged with providing instructional services in the most cost-effective and productive manner possible. Effective and efficient programs and a well-designed instructional program determine how well a district meets its goal of educating children. In support of this goal, the facilities organization is tasked with developing effective facilities operations and maintenance programs to provide safe, productive, and clean environments where students can learn. The facilities mission is to create and maintain buildings that support the task of education of our children.

Lamesa Independent School District (LISD) is a non-metro district located in Lamesa, Texas, 62 miles south of Lubbock on U.S. 87. LISD serves over 1,900 students in and around Dawson County. It has five educational campuses: South Elementary, North Elementary, Lamesa Middle School, Lamesa High School, and Lamesa Success Academy. In addition, there are special education facilities, Head Start/ Pre-K schools, as well as administrative and support facilities.

Local enrollment has seen a decline over the past few years. The 2009–10 enrollment was down from the previous year by about 1 percent. Overall, enrollment is down over the previous four years by a total of 6 percent. **Exhibit 5–1** provides a summary of student enrollment from school year 2006–07 to 2009–10.

EXHIBIT 5–1
LAMESA ISD ENROLLMENT BY YEAR
SCHOOL YEARS 2006–07 TO 2009–10

SCHOOL YEAR	TOTAL
2006–07	2,038
2007–08	2,003
2008–09	1,942
2009–10	1,924

SOURCE: Texas Education Agency, Public Education Information Management System (PEIMS) Standard Reports, 2007–2010.

The maintenance organization is responsible for a diverse set of facilities covering more than 496,000 square feet, summarized in **Exhibit 5–2**.

The maintenance organization is led by the Maintenance and Transportation Director, who reports directly to the assistant superintendent of Finance and Operations. [Note: the Maintenance and Transportation Director position became vacant shortly after the review team visited the district in February 2011.] The Maintenance and Transportation Director supervises three foremen—Maintenance (Physical Plant) foreman, Grounds foreman, and Transportation foreman—and five Custodial supervisors.

EXHIBIT 5–2
LAMESA ISD BUILDING INVENTORY
SCHOOL YEAR 2010–11

FACILITY	YEAR BUILT	GROSS SQUARE FEET (GSF)
South Elementary School	1959	82,265
North Elementary School	1949	84,064
Middle School	1969	100,858
High School	1949	125,001
HS Vocational Building	1960	17,472
HS Field House	1980	3,636
HS Weight Room	1994	6,000
Success Academy	1939	13,140
JH Gymnasium	1926	10,962
JH Vocational Building	1969	4,840
VZ Rogers (Head Start)	1957	15,531
VZ Multi-Purpose Facility	1995	5,160
Life Skills Building	1949	5,270
Alternative School	1953	2,023
Walter Horn – Special Ed	1960	1,930
Administration Building	1932	9,192
Maint. & Trans. Building*	1950s	5,550
Bus Barn	1965	3,400
Total Gross Square Feet (GSF)		**496,294**

*The Maintenance and Transportation building was not listed in the district insurance records; however, it was occupied and in use by the maintenance organization in addition to the Bus Barn. The area of the bus barn was estimated based on drawings provided by the Maintenance and Transportation Director.
SOURCE: Property Appraisal Packet, TASB Risk Management Fund, 2009.

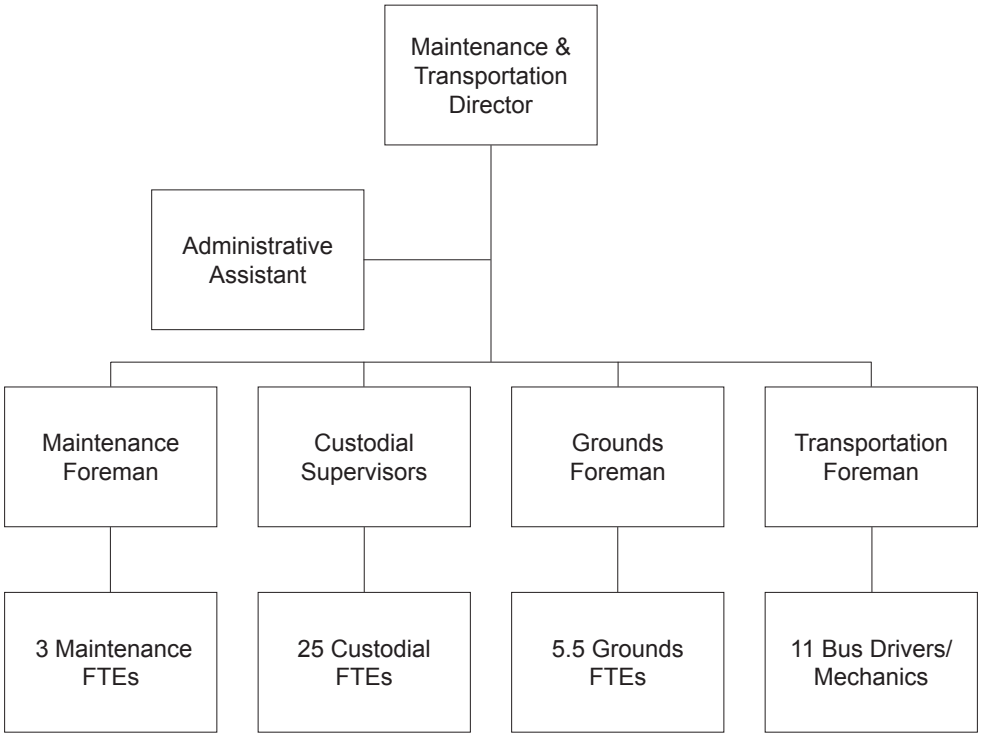
In addition to the three foremen, the division of labor is as follows:

- Maintenance — 3 full-time equivalents (FTEs);
- Transportation — 11 FTEs
- Custodial — 25 FTEs; and
- Grounds — 5.5 FTEs.

The Maintenance and Transportation Department organizational structure is shown in **Exhibit 5–3**.

Exhibit 5–4 presents a summary of the LISD Operations and Management (O&M) budget for school year 2010–11.

EXHIBIT 5–3
LAMESA ISD MAINTENANCE & TRANSPORTATION DEPARTMENT ORGANIZATION
SCHOOL YEAR 2010–11



SOURCE: Lamesa ISD Maintenance and Transportation Department, February 2011.

EXHIBIT 5–4
LAMESA ISD SUMMARY OF MAINTENANCE AND OPERATIONS BUDGET
SCHOOL YEAR 2010–11

BUDGET LINE ITEM	2010–11 BUDGET
Custodial Services	
Custodial Salary and Benefits	$736,458
Uniforms	$12,500
Custodial Supplies	$38,000
Equipment	$30,500
Custodial Subtotal	***$817,458***
Maintenance	
Maintenance Salaries and Benefits	$476,746
Bldg./Equipment Repairs	$61,000
Misc. Contracted Services	$50,000
Materials and Supplies	$51,500
Grounds Supplies	$25,000
Summer Repair Fund	$70,000
Grounds Equipment	$30,000
Maintenance Subtotal	***$764,246***
Utilities	
Electric	$250,000
Natural Gas	$100,000
Water Service	$58,000
Telephone	$35,000
Waste	$18,000
Utilities Subtotal	***$461,000***

SOURCE: Lamesa ISD Detail Budget Status Report by Organization, February 25, 2011.

ACCOMPLISHMENTS

- LISD enjoys widespread and consistently high levels of customer satisfaction regarding the level of service and response provided by the Maintenance Department.
- LISD has undertaken recent initiatives to improve capital planning and budgeting through the completion of facility condition assessments at the high school.
- LISD developed a facility master plan specifically for the high school to aid in modernizing the campus.

FINDINGS

- LISD has no established standards or methods for determining maintenance, custodial, and grounds staffing levels.
- LISD has no educational specifications for space standards or space use.
- Many of LISD's facilities initiatives and processes—such as construction and project management, operations and maintenance, and facilities planning—are informal and lack documentation.
- LISD has no formal energy management programs or sustainability policies currently in place.
- LISD's facilities capital renewal expenditures have been somewhat reactive and have not kept pace with the aging school facilities.
- LISD's maintenance program is insufficient to provide good long-term stewardship needed to preserve the district's facilities.
- LISD lacks organization of its facilities data and information.
- LISD has a limited training program and no specific line-item in the operations budget for maintenance and custodial staff.
- LISD has not developed performance measures to evaluate its facilities and maintenance (FM) operations.

RECOMMENDATIONS

- **Recommendation 25: Develop staffing models for maintenance, custodial, and grounds staff.**
- **Recommendation 26: Develop/formalize educational space standards and perform space utilization analyses across all campuses to ensure adequate and appropriately used educational and support space.**
- **Recommendation 27: Formalize and document facilities planning and maintenance policies and procedures to ensure effective planning, construction, operation, and maintenance of the facilities.**
- **Recommendation 28: Develop a district energy management program and policy to conserve energy and reduce costs.**
- **Recommendation 29: Initiate a systematic and periodic facility condition assessment (FCA) process for all facilities to prepare annual facility asset management plans and facility capital needs forecasts.**

- **Recommendation 30: Implement a formal and documented comprehensive preventive maintenance program.**
- **Recommendation 31: Consider the purchase and implementation of a simple computerized maintenance management system (CMMS) to help organize, streamline, and document operations and maintenance efforts.**
- **Recommendation 32: Develop and fund a formal operations and maintenance training/professional development program.**
- **Recommendation 33: Develop a limited number of key performance indicators (KPI) to measure performance and show stakeholders areas of improvement and accomplishments.**

DETAILED ACCOMPLISHMENTS

HIGH LEVELS OF CUSTOMER SATISFACTION

LISD enjoys widespread and consistently high levels of customer satisfaction regarding the level of service and response provided by the Maintenance Department. A summary of comments provided in informal interviews with campus and district staff during the visit by the review team included the following:

"Facilities service is great. [Facilities staff] are very responsive to our needs. The building is always clean."

"I am very impressed with our facilities organization. They provide great response and do a great job keeping things going. No complaints."

"Our air conditioning tends to go out a lot, but we call [maintenance staff] and they are very responsive."

"Facilities service is really good. When we have problems, things are taken care of quickly."

"The facilities maintenance staff is very responsive if we have problems. We are having trouble right now chasing a roof leak."

"Clean, well-kept buildings. We take pride in our facilities."

Based on a cursory walk-through of the school facilities, the LISD campus facilities did appear clean and well-kept during the review team's site visits.

CAPITAL PLANNING INITIATIVES

LISD has undertaken recent initiatives to improve capital planning and budgeting through the completion of facility condition assessments at the high school. An assessment team from Parkhill, Smith and Cooper, Inc. (PSC) performed a facility condition assessment, utilization, and educational adequacy study of Lamesa High School. The assessment team was comprised of building design professionals, including an architect, structural engineer, mechanical engineer, and electrical engineer.

The facility condition assessment (FCA) identified several deficiencies and building renewal needs. Some of the deficiencies and needs included life safety concerns, barriers to accessibility, security needs, and 'antiquated' mechanical and electrical infrastructure. Immediate and longer-term needs were identified.

The FCA was comprehensive and presented three key indexes: the Facility Condition Index (FCI), Facility Condition Needs Index (FCNI), and the Modified Recapitalization Metric (MRM). The FCI and FCNI are industry standard condition indexes developed for educational facilities. The MRM was an internally developed metric developed by PSC for the Department of Defense Education Activity. The following results were presented in the report:

- FCI = 0.28 (poor condition);
- FCNI = 0.44 (adequate); and
- MRM = 1.41 (replace).

The results of the functional adequacy survey, in accordance with the Council of Educational Facilities Planners International (CEFPI), indicated that complete renovation or replacement of the high school should be considered. The FCA also presented the following six recommendations:

- take immediate action to address potential safety issues identified during the assessment;
- begin work on a facilities master plan;
- begin implementing a life/fire safety plan to address major deficiencies;
- consider a long-term capital improvements plan;
- consider renovation to the homemaking lab facilities, band and choir rooms, modernizing science labs, and adding technology infrastructure; and

- consider a major high school renovation project or replacement within the next five years.

The FCA was conducted only on the high school facilities and rooftop HVAC units across the LISD campuses. The FCA was reported to be very useful in supporting the high school renovation bond issue. It provided a sound condition-based asset management plan and master plan options for critical decisions regarding the renovation of the high school. The FCA was a great first step in developing a facility asset management plan for the district.

NEW FACILITY MASTER PLAN

LISD developed a facility master plan specifically for the high school to aid in modernizing the campus. Beginning in September 2009, LISD worked with Parkhill, Smith and Cooper, Inc., to develop a suitable master plan for Lamesa High School. Information was extracted from the previous facility condition assessment, space utilization study, and education adequacy study to investigate several options for the high school renewal. The master plan has provided the district with the data necessary to make informed decisions regarding projected needs for the future. Various design schemes were filtered through the Citizen's Advisory Committee to review alternative concept designs for suitability and functionality. The Committee approved a design scheme that was presented to the LISD Board of Trustees in August 2010.

DETAILED FINDINGS

EVALUATE STAFFING LEVELS (REC. 25)

LISD has no established standards or methods for determining maintenance, custodial, and grounds staffing levels. Based on published industry standard benchmarks, the Maintenance Department is slightly understaffed, while the custodial services group is overstaffed and recording a significant amount of overtime work. The overall cost of maintenance operations is slightly higher, but in line with industry benchmarks.

The district's ratio of maintenance staff to gross building area maintained per full-time equivalent (FTE) (staff: gsf) is 1:124,074. The standard published in the *American School and University* (AS&U) *M&O Cost Study* (April 2008) is 1:107,439. These staffing guidelines would indicate that the district may be currently understaffed by three FTEs and underfunded by one FTE (including two funded vacant positions) according to industry standards. Similarly, the custodial group of 25 FTEs maintains the same amount of building area, which translates to about 19,852 gsf/FTE. This amount is less than the median average of 26,786 gsf/FTE reported in the AS&U Cost Study. The review team was unable to evaluate the grounds staffing levels, because there was no available information regarding the overall acreage maintained by the 5.5 grounds FTEs.

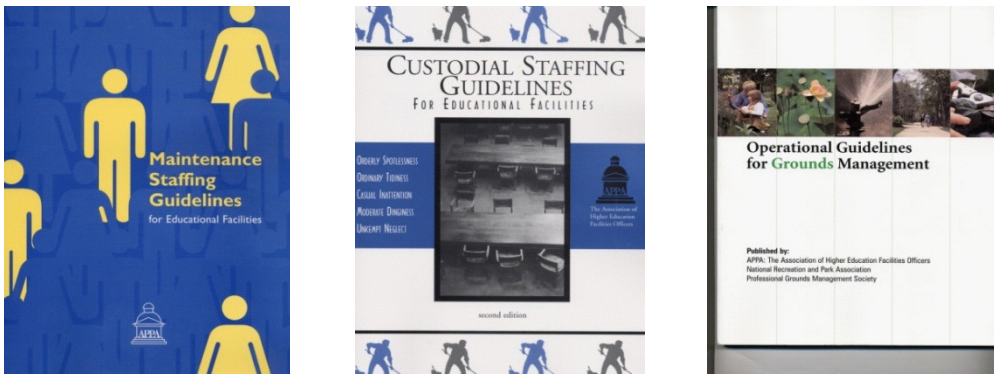
The district did not provide the review team with any written or verbal staffing guidelines for maintenance and grounds staffing decision-making. Current staffing levels are based on historical staffing levels and LISD senior leadership's experience with school operations. Published staffing benchmarks, such as those published by AS&U, are a good starting point for determining the appropriate number of FTEs; however, they do not take into account the desired level of service, appearance, and attention.

A best practice is to conduct aggregate staffing analyses based on institutional surveys and benchmarks established by the Association of Higher Education Facilities Officers (APPA) in the following publications: *Maintenance Staffing Guidelines for Educational Facilities (APPA. 2002), Custodial Staffing Guidelines for Educational Facilities (APPA. 1998),* and *Operational Guidelines for Grounds Management (APPA/PGMS. 2001)*. These reference guides present several factors in determining how many FTEs are required to maintain school facilities (**Exhibit 5–5**).

These standards are used extensively in the public sector as guidelines for comparing facility condition with the level of effort needed to maintain a desired level of service. A modified approach to this measure is often more useful because it allows customers to determine the desired service level for a given facility and then match their expenditures and level of effort to the desired outcome. This approach recognizes that not all facilities need to be maintained to the highest level. It allows the maintenance leadership to evaluate its portfolio and assign variable service levels as customer needs, capital funds availability, and operating budgets dictate.

The aggregate maintenance staffing analysis is primarily based on reported staffing levels for institutions across the United States at various levels of service. The major element in the analysis is square footage but incorporates other factors for representative building ages, facility condition indexes (FCI), mission, building system complexities, travel time, and building system variances. The APPA guidelines also incorporate special considerations, such as additional requirements for shift work, special event support, minor

EXHIBIT 5–5
INDUSTRY STAFFING GUIDELINES FOR EDUCATIONAL FACILITIES



SOURCE: Association of Higher Education Facilities Officers (APPA), Maintenance Staffing Guidelines for Educational Facilities (2002), Custodial Staffing Guidelines for Educational Facilities (1998), and Operational Guidelines for Grounds Management (2001).

and major project support, operations support, and operations and maintenance of specialty systems.

The basis for the custodial staffing analysis is cleanable area per FTE by space type standard and type of finishes for various appearance levels. Primary APPA space standards include: classrooms, entranceways and public circulation, administrative offices, laboratories, stairwells, washrooms, utility/storerooms, cafeterias, libraries, auditoriums, gymnasiums, and health care (patient treatment areas).

Calculating staffing requirements for grounds areas is based on two essential factors: type of area maintained and tasks associated with the maintenance; and amount of care to be provided, or the level of attention or service to be paid to the area. The tasks associated with the grounds maintenance includes: turf care, fertilization, irrigation, pruning, pest control, shrub and floral plantings, mulching, bed preparation, hardscape maintenance, snow removal, and specialty grounds maintenance. Types of areas include: flower beds (i.e., annual and perennial), shrub areas, athletic fields, general turf areas, and forested areas.

Combining a number of customer expectations with the levels of performance for maintenance and repair activities creates a matrix (**Exhibit 5–6**). Maintenance at LISD is estimated to be performing at a level 3, Managed Care. Unfortunately, LISD does not maintain comprehensive work records to verify all information; therefore, this assessment is based solely on information gathered through observations and interviews.

There are also levels of service matrices for custodial services and grounds operations (**Exhibits 5–7** and **5–8**). Similarly, it appears that the custodial services at LISD school buildings are currently being performed at appearance level 2, Orderly Tidiness—as outlined in **Exhibit 5–7**. This level is the recommended level for school facilities.

The review team could not address the grounds maintenance due to lack of information regarding specific grounds areas and seasonal aspects. The recommended level of attention for grounds is also level 2 – High Level, based on APPA and the Professional Grounds Maintenance Society (PGMS), as seen in **Exhibit 5–8**.

A general walk-through indicated that facilities were clean and comfortable but had variable climate. Staff reported in interviews that the preventive maintenance program is sporadic, and documentation is very limited. Because of the age of the facilities, finishes and equipment at most facilities are showing signs of wear and tear. There were reported issues with the packaged HVAC equipment creating challenges to maintain adequate temperature control at the schools due to the age of the equipment.

The optimal level of maintenance for a curriculum-based facility should be a Level 2 – Comprehensive Stewardship (**Exhibit 5–7**). Maintaining current staffing levels will only yield between a level 3 and level 4. Because of the age of the facilities, the maintenance organization has been able to provide primarily reactive maintenance and service with fewer staff. As the facilities continue to age, the same level of service will be unachievable without the appropriate increase in staff.

The custodial staffing levels appear to be higher than industry benchmarks and most likely the staffing levels recommended

EXHIBIT 5–6
APPA MAINTENANCE STAFFING GUIDELINES FOR EDUCATIONAL FACILITIES

LEVEL	1	2	3	4	5
DESCRIPTION	SHOWPIECE FACILITY	COMPREHENSIVE STEWARDSHIP	MANAGED CARE	REACTIVE MANAGEMENT	CRISIS RESPONSE
Customer Service & Response Time	Able to respond to virtually any type of service, immediate response.	Response to most service needs, including non-maintenance activities, is typically in a week or less.	Services available only by reducing maintenance, with response times on one month or less.	Services available only by reducing maintenance, with response times of one year or less.	Services not available unless directed from top administration, none provided except emergencies.
Customer Satisfaction	Proud of facilities, have a high level of trust for the facilities organization.	Satisfied with facilities related services, usually complimentary of facilities staff.	Accustomed to basic level of facilities care. Generally able to perform mission duties. Lack of pride in physical environment.	Generally critical of cost, responsiveness, and quality of facilities services.	Consistent customer ridicule, mistrust of facilities services.
Preventive Maintenance vs. Corrective Maintenance	100%	75-100%	50-75%	25-50%	<25%
Maintenance Mix	All recommend preventive (PM) is scheduled and performed on time. Emergencies (e.g. storms or power outages) are very infrequent and are handled efficiently.	A well-developed PM program; most required PM is done at a frequency slightly less than per defined schedule. Occasional emergencies caused by pump failures, cooling system failures, etc.	Reactive maintenance predominates due to systems failing to perform, especially during harsh seasonal peaks. The high number of emergencies causes reports to upper administration.	Worn-out systems require staff to be scheduled to react to systems that are performing poorly or not at all. PM work possible consists of simple tasks and is done inconsistently.	No PM performed due to more pressing problems. Reactive maintenance is a necessity due to worn-out systems. Good emergency response because of skills gained in reacting to frequent system failures.
Aesthetics, Interior	Like-new finishes.	Clean/crisp finishes.	Average finishes.	Dingy finishes.	Neglected finishes.
Aesthetics, Exterior	Windows, doors, trim, exterior walls are like new.	Watertight, good appearance of exterior cleaners.	Minor leaks and blemishes, average exterior appearance.	Somewhat drafty and leaky, rough-looking exterior, extra painting necessary.	Inoperable windows, leaky windows, unpainted, cracked panes, significant air and water penetration, poor appearance overall.
Aesthetics, Lighting	Bright and clean, attractive lighting.	Bright and clean, attractive lighting.	Small percentage of lights out, generally well lit and clean.	Numerous lights out, some missing diffusers, secondary areas dark.	Dark, lots of shadows, bulbs and diffusers missing, cave-like, damaged, hardware missing.
Service Efficiency	Maintenance activities appear highly organized and focused. Service and maintenance calls are responded to immediately.	Maintenance activities appear organized with direction. Service and maintenance calls are responded to in a timely manner.	Maintenance activities appear to be somewhat organized, but remain people-dependant. Service and maintenance calls are variable and sporadic, without apparent cause.	Maintenance activities appear somewhat chaotic and are people-dependant. Service and maintenance calls are typically not responded to in a timely manner.	Maintenance activities appear chaotic and without direction. Equipment and building components are routinely broken and inoperable. Service and maintenance calls are never responded to in a timely manner.

EXHIBIT 5–6 (CONTINUED)
APPA MAINTENANCE STAFFING GUIDELINES FOR EDUCATIONAL FACILITIES

LEVEL	1	2	3	4	5
DESCRIPTION	SHOWPIECE FACILITY	COMPREHENSIVE STEWARDSHIP	MANAGED CARE	REACTIVE MANAGEMENT	CRISIS RESPONSE
Building Systems' Reliability	Breakdown maintenance is rare and limited to vandalism and abuse repairs.	Breakdown maintenance is limited to system components short of mean time between failures (MTBF).	Building and systems components periodically or often fail.	Many systems are unreliable. Constant need for repair. Backlog of repair needs exceeds resources.	Many systems are non-functional. Repair instituted only for life safety issues.
Facility Maintenance Operating Budget as % of CRV	>4.0	3.5-4.0	3.0-3.5	2.5-3.0	<2.5
Campus Average FCI	<0.05	0.05-0.15	0.15-0.29	0.30-0.49	>0.50

SOURCE: Maintenance Staffing Guidelines for Educational Facilities (APPA, 2002).

EXHIBIT 5–*7*
APPA CUSTODIAL STAFFING GUIDELINES FOR EDUCATIONAL FACITILITIES

LEVEL	1	2	3	4	5
DESCRIPTION	ORDERLY SPOTLESSNESS	ORDINARY TIDINESS	CASUAL INATTENTION	MODERATE DINGINESS	UNKEMPT NEGLECT
Floors & Base Moldings	Shine and/or are bright and clean; colors are fresh.	Shine and/or bright and clean; no build-up in corners or along walls; up to two days worth of dust, dirt, stains, or streaks.	Floors are swept or vacuumed clean, but upon close observation there can be stains. A build-up of dirt and/or floor finish in corners and along walls can be seen. There are dull/ spots and/or matted carpet in walking lanes. There are streaks or splashes on base moldings.	Floors are swept or vacuumed clean, but are dull, dingy, and stained. There is a noticeable build-up of dirt and/or floor finish in corners and along walls. There is a dull path and/or floor obviously matted carpet in the walking lanes. Base molding is dull and dingy with streaks and splashes.	Floors and carpets are dull, dingy, scuffed, and/ or matted. There is a conspicuous build-up of old dirt and/or floor finish in the corners and along walls. Base molding is dirty, stained, and streaked. Gum, stains, dirt, dust balls, and trash are broadcast.
Vertical & Horizontal Surfaces	Freshly cleaned or polished appearance and have no accumulation of dust, dirt, marks, streaks, smudges, or fingerprints. Lights all work and fixtures are clean.	Surfaces are clean, but marks, dust, smudges, and fingerprints are noticeable upon close observation. Lights work and fixtures are clean.	All vertical and horizontal surfaces have obvious dust, dirt, marks, smudges, and fingerprints. Lamps all work and fixtures are clean.	All vertical and horizontal surfaces have conspicuous dust, dirt, marks, smudges, and fingerprints. Lamp fixtures are dirty and some lamps (up to 5%) are burned out.	Major accumulation of dust, dirt, smudges, and fingerprints, all of which will be difficult to remove. Lack of attention obvious.
Washroom & Shower Fixtures	Fixtures and tile gleam and are odor-free. Supplies are adequate.	Fixtures and tile gleam and are odor-free. Supplies are adequate.	Fixtures and tile have some dull spots and upon further observation have build-up of dirt. Slight odor is apparent. Supplies are adequate.	Fixtures and tile are dull, dingy and stained. Odor is obvious. Some supplies are inadequate (less than 5% missing).	Fixtures and tile are dull, dingy and stained. Odor is overwhelming. Supplies are inadequate (more than 5% missing).
Trash Containers & Pencil Sharpeners	Hold only daily waste, and are clean and odor free.	Hold only daily waste, and are clean and odor free.	Hold only daily waste, and are clean and odor free.	Have old trash and shavings. They are stained and marked. Trash containers smell sour.	Light fixtures are dirty with dust balls and flies. Many lamps (more than 5%) are burned out.

SOURCE: Custodial Staffing Guidelines for Educational Facilities (APPA, 1998).

EXHIBIT 5–8
APPA GROUNDS STAFFING GUIDELINES FOR EDUCATIONAL FACILITIES

LEVEL	1	2	3	4	5
DESCRIPTION	STATE-OF-THE-ART MAINTENANCE	HIGH-LEVEL MAINTENANCE	MODERATE-LEVEL MAINTENANCE	MODERATELY LOW-LEVEL MAINTENANCE	MINIMUM-LEVEL MAINTENANCE
Turf Care	Grass height maintained. Mowed at least once every five days and as often as once every three days.	Grass cut every five days.	Grass cut once every ten working days.	Low-frequency mowing scheduled based on species.	Low-frequency mowing scheduled based on species.
Fertilizer	Adequate fertilization applied to plant species according to their optimum requirements.	Adequate fertilizer level to ensure that all plant materials are healthy and growing vigorously.	Applied only when turf vigor seems to be low.	Not fertilized.	Not fertilized.
Irrigation	Sprinkler irrigated – electric automatic commonly used. Frequency of use follows rainfall.	Sprinkler irrigated – electric automatic commonly used. Frequency of use follows rainfall.	Dependent on climate.	No irrigation.	No irrigation.
Litter Control	Minimum of once per day, seven days per week.	Minimum of once per day, five days per week.	Minimum service of two to three times per week.	Once per week or less.	On demand or complaint basis.
Pruning	Frequency dictated primarily by species and variety of trees and shrubs.	Usually done at least once per season unless species planted dictate more frequent attention.	When required for health or reasonable appearance.	No regular trimming.	No pruning unless safety is involved.
Disease and Insect Control	Controlling objective is to avoid public awareness of any problems.	Usually done when disease or insects are inflicting noticeable damage, are reducing vigor or plant material, or could be considered both to the public.	Done only to address epidemics or serious complaints.	None except where the problem is epidemic and the epidemic condition threatens resources or the public.	No control except in epidemic or safety situations.
Snow Removal	Snow removal starts the same day that accumulations of 0.5 inch are present.	Snow removed by noon the day following snowfall.	Done based on local law requirements but generally accomplished by the day following snowfall.	Done based on local law requirements but generally accomplished by the day following snowfall.	Done based on local law requirements but generally accomplished by the day following snowfall.
Surfaces	Sweeping, cleaning, and washing of surfaces should be done so that at no time does an accumulation of sand, dirt, or leaves distract from the looks or safety of the area.	Should be cleaned, repaired, repainted, or replaced when their appearances have noticeably deteriorated.	Cleaned on complaint basis. Repaired or replaced as budget allows.	Replaced or repaired when safety is a concern and when budget is available.	Serviced only when safety is a consideration.
Repairs	Repairs to all elements of the design should be done immediately.	Should be done whenever safety, function, or appearance is in question.	Should be done whenever safety or function is in question.	Should be done whenever safety or function is in question.	Should be done whenever safety or function is in question.
Inspections	A staff member should conduct inspection daily.	A staff member should conduct inspection daily.	Inspections are conducted once per week.	Inspections are conducted once per month.	Inspections are conducted once per month.

EXHIBIT 5–8 (CONTINUED)
APPA GROUNDS STAFFING GUIDELINES FOR EDUCATIONAL FACILITIES

LEVEL	1	2	3	4	5
DESCRIPTION	STATE-OF-THE-ART MAINTENANCE	HIGH-LEVEL MAINTENANCE	MODERATE-LEVEL MAINTENANCE	MODERATELY LOW-LEVEL MAINTENANCE	MINIMUM-LEVEL MAINTENANCE
Floral Plantings	Maximum care, including watering, fertilizing, disease control, disbudding, and weeding, is necessary. Weeding is done a minimum once per week.	Care cycle is usually at least once per week, but watering may be more frequent. Bed essentially kept weed free.	Only perennials or flowing trees of shrubs.	None.	None.

SOURCE: Operational Guidelines for Grounds Maintenance (APPA/PGMS, 2001).

by the APPA level of appearance 2. A review of operations expenditures indicated that 70 percent to 80 percent of the expenditures were related to staff salaries and benefits. Based on a review of payroll overtime reports provided by LISD, there was also a significant amount of overtime pay for custodial staff. The review team was informed that much of the overtime is related to custodial support of athletic events and, in some cases, incurring overtime to drive buses for regular school days and activities.

LISD should develop staffing models for maintenance, custodial, and grounds staff. The district should use benchmark guidelines as a first step and then possibly refine staffing resources using APPA level of service models, if needed. The district should conduct a careful evaluation of the custodial staffing levels and work distribution. This effort may warrant a slight reduction in custodial staffing levels. At a minimum, it should identify opportunities to reduce the amount of overtime pay based on more effective and efficient workflow processes.

Based on published industry standard benchmarks and preliminary calculations, the maintenance department is slightly understaffed, while the custodial services group is overstaffed and recording a significant amount of overtime work. There should be potential for annual savings through more effective allocation, planning, and utilization of staff, which could result in annual savings of about $20,000.

SPACE UTILIZATION (REC. 26)

LISD has no educational specifications for space standards or space use. There also appears to be excess space in LISD facilities being used for surplus school equipment storage. Declining student enrollment over the past few years has freed up space within many of LISD's school buildings. The review team observed a number of unused classroom areas being used for storage of surplus school equipment and assets. Based on preliminary space utilization analyses and state space classification standards, the LISD campuses provide adequate educational and support space, with the exception of the high school classroom sizes. However, there are no space standards that can be utilized to optimize the use and value of space within the campus buildings.

Because there has not been any new school construction for quite some time, the average age of the school facilities in the LISD is about 60 years. School space renovations and adaptations over that time have been made to optimize the use of space within the constraints of the existing structures. However, space layout and design standards have changed, and the LISD facilities have not kept pace with that change. The LISD schools do not reflect many of today's standards in design guidelines recommended by architects and National Center for Educational Statistics (NCES) of the Department of Education recommendations.

As many school districts have grown in recent years, a collection of the intellectual knowledge of "what works best" in schools has been created. The best way to capture valuable intellectual knowledge regarding best practices in school design and use is to develop design guidelines or district education specifications for school design. The practice of developing the guidelines can and should incorporate feedback from an architect, teachers, facilities staff, school superintendent, CFO, and construction manager. The design guidelines should include space and layout standards, materials, furnishings, mechanical systems, building automation systems, and other specialty construction.

One primary reference that can be used to aid in the comparison of school facilities to best practices is the Texas School Facilities Standards for Construction. The standards provide specific guidance regarding the development of educational specifications that contain the minimum space

area and design requirements for instructional space, laboratories, specialized classrooms, and major support space (e.g., libraries, cafeterias, gymnasiums, and other assembly spaces). Another key reference is the Guide for School Facility Appraisal published by the Council of Educational Facility Planners International (CEFPI, 1998). The guidelines can be used to help evaluate to what level existing schools meet the conditions of educational adequacy based on the requirements of the school district's educational program and the student population it serves.

LISD should develop/formalize educational space standards and perform space utilization analyses across all campuses to ensure adequate and appropriately used educational and support space. The district should evaluate the space utilization, space layout, current configurations, and educational adequacy of the LISD campuses with respect to current design standards. The steps required to conduct a space analysis and develop educational space standards include the following:

1. Inventory spaces at each campus and classify according to use (e.g., classroom, library, administrative, multipurpose, auditorium, laboratory, support, common area, circulation, mechanical, etc.);
2. Determine average and total space size by category for each campus;
3. Evaluate current and projected enrollments with respect to space needs;
4. Use Texas state guidelines or Department of Education space standards to identify gaps or areas of excess space;
5. Conduct an educational suitability analysis following Council of Educational Facility Planners International (CEFPI) guidelines; and
6. Document ideal space standards and formalize educational specifications for the district.

The space analysis and educational space standards should be developed using internal resources including the Maintenance and Transportation Director and the assistant superintendent of Finance and Operations, as well as support staff as needed. There should be no financial impact for this effort. The enhanced use of space in the long-term would provide a significant return on investment.

CONSTRUCTION AND MAINTENANCE DOCUMENTATION (REC. 27)

Many of LISD's facilities initiatives and processes—such as construction and project management, operations and maintenance, and facilities planning—are informal and lack documentation. While district staff may be accomplishing the tasks, they are done so informally and often inconsistently. For example, preventive maintenance of building systems and equipment was reportedly performed; however, there was limited documentation to identify the preventive maintenance job plans, tasks, and frequencies of performance, or the documentation to support they were completed. Similarly, regulatory safety training was reportedly being accomplished by staff. Some of the training documents were maintained in personnel files, other training was not. This practice makes it very difficult to provide adequate documentation to building officials or other regulatory agencies should documentation of the training programs be requested. Due to the lack of major construction projects in the recent past, there has not been a pressing need for such documentation to support the effective project management of new projects. There is an opportunity to refine, update or create operations and maintenance policies and processes as necessary, which would enhance the effectiveness of the overall maintenance and minimize the costs of maintaining the facilities.

LISD should formalize and document facilities planning and maintenance policies and procedures to ensure effective planning, construction, operation, and maintenance of the facilities. This effort should include formalizing processes for the following:

- cost and schedule controls for capital construction projects;
- facility master planning (long-range plan);
- value engineering and post-occupancy reviews;
- maintainability reviews during design phases;
- commissioning;
- facilities documentation exchange and control;
- facilities management information standards;
- capital needs assessment;
- preventive maintenance programs; and
- facilities performance measurement (key performance indicators).

The implementation of formal and documented processes for facilities management could result in significant cost avoidance and increased staff efficiencies. While there is effort required to document the processes, it is generally small in comparison to the potential cost savings. Examples of potential cost avoidance and savings are presented in each of the following subsections.

COST AND SCHEDULE CONTROLS FOR CAPITAL CONSTRUCTION PROJECTS

LISD should implement cost and schedule controls for capital construction projects. Many of the smaller capital projects completed in the past have been accomplished using in-house resources. Because of the lack of major capital construction projects in LISD, there has not been a need to develop the experience or strong capabilities to manage these types of projects. A Construction Manager at-Risk (CM @ Risk) is one available contracting arrangement for any future construction that typically enhances early coordination and provides a means for all parties to have similar financial goals. This has resulted in greater cost and schedule controls for many school projects across the state of Texas.

A study conducted by the California State Allocation Board entitled "Public School Construction Cost Reduction Guidelines" identifies several benefits to a CM @ Risk contractual relationship:

- **GC input early in design:** The traditional Design, Bid, Build approach involves the general contractor (GC) after the design is complete. The CM @ Risk method uses a contractor who is selected prior to, and involved in, the design. During the design phase, the CM @ Risk functions as advisor on the design. When the design has reached sufficient completion (this can vary with each project), the CM @ Risk commits to a Guaranteed Maximum Price (GMP) for the project and shifts to function as the general contractor and builds the project. The benefit is in greater understanding of the desired facility function and gaining the GC's input during design, resulting in an ongoing value engineering process.
- **GMP:** Typically, the GMP is arrived at and agreed upon prior to completion of the design documents. This helps the district to confirm its costs early in the process and to make changes (to the design) before the start of construction.
- **Input on cost impacts of design:** The CM @ Risk adds the contractor's point of view throughout the design process to ensure that there are no surprises. This is a significant benefit. The CM @ Risk (just like the design-build entity) cannot claim ambiguity or other deficiencies in the plans and specifications, since the CM @ Risk is responsible for overseeing and approving them as part of the GMP commitment.
- **Savings concept:** A savings clause is an incentive to save costs. It is always a part of the GMP approach and typically provides for sharing cost savings between the CM @ Risk and the school district. The shared percentage varies based on the agreement between the parties.
- **Works well on complex projects:** This method is deemed to work well on complex projects due to a more comprehensive understanding of function, project schedules, and building systems and construction methods.
- **Rebid subcontracts:** A typical approach within this method is to publicly bid most if not all subcontract work. This is a benefit because subcontractors can be prequalified, and subcontractor costs are subject to better scrutiny.

FACILITY MASTER PLANNING

One of the district's accomplishments is the development of a master plan for the high school prior to the proposed capital renovation of the high school. Currently, short- and long-term planning is conducted primarily by the school superintendent and assistant superintendent of Finance and Operations on an informal basis. The planning consists of reviewing enrollment projections and developing alternative scenarios of schools and school configurations to meet the needs of the school district. In addition to current planning efforts, a more formal master plan should be considered. Other factors should be considered including: facility condition, life-cycle analyses, long-term capital needs requirements, budgets, timelines, and impact of maintenance programs.

A school facility master plan is the "blueprint" for decision-making throughout the school district. It is a formal way of communicating the district's needs, priorities, and intentions to all stakeholders. The master plan also establishes the necessary documentation for stakeholders, funding authorities, and the community to approve funding. As such, the process of master planning establishes a forum through which interested members of the community can voice their

opinions to school administrators. When formulating a master plan, the process should allow for input from teachers, students, parents, taxpayers, and other interested parties that live within the school district. This collaborative planning process helps the community feel that their views are valued.

Major considerations should include the following:

- a description of the current and future instructional program and instructional delivery issues;
- the age, condition, and educational adequacy of all buildings across the LISD campuses, design flexibility, and costs to repair, renovate, or replace buildings;
- verification of the suitability of school sites for the intended use, considering location, size, shape, usable land, adequate vehicular and pedestrian access, parking, playgrounds, fields; and
- a timeline and series of recommended options to modify or supplement existing facilities to support the LISD mission.

Good master plans include short- and long-term objectives linked to the mission and vision of the school district. A more detailed master plan would include the following:

- introduction;
- master plan definitions;
- district strategic objectives (drawn from the district's strategic business plans);
- annual expenditures summary;
- historical school development and renewal;
- historical enrollment;
- enrollment projections;
- projected enrollment vs. permanent capacity;
- enrollment configurations:
  - current district grade configuration;
  - anticipated grade configuration changes; and
  - anticipated effects on facility needs.
- anticipated school boundary changes or consolidation of schools within the district;
- economic environment of the district;
- other community factors that will affect school facility needs;
- general facility data;
- campus educational adequacy summaries;
- portable buildings used for academic purposes;
- review of maintenance practices and impact;
- facility condition assessment data;
- 10- to 20-year modernization / replacement program;
- prioritization of capital projects (new schools and renovations);
- cost assumptions;
- development options/alternatives;
- recommendations; and
- project specific timelines.

Carefully developed and comprehensive master plans provide information to the community and stakeholders that aids in the approval of bonds and funds sufficient to adequately maintain school facilities. Comprehensive master plans also provide adequate documentation to allow decision makers to objectively and equitably prioritize needs and make better facility decisions.

VALUE ENGINEERING AND POST-OCCUPANCY REVIEWS

Value engineering is usually conducted by the construction manager and owner as part of the CM @ Risk process. The intent of value engineering is to optimize the technical and operational aspects of a facility by considering the best life cycle solutions for systems, equipment, and finishes. There appears to be limited information captured from post-occupancy reviews and maintainability of the schools in the past. A more formal value engineering process would link the reviews with commissioning results, post-occupancy surveys, and long-term performance measured via the facilities maintenance department. Post-occupancy input from principals, teachers, and school staff can lead to higher performing schools over time. Formalizing this process would lead to greater long-term value and enhanced functionality of the schools.

LISD should implement a detailed and documented value engineering process to help achieve essential school functions at the lowest life-cycle cost consistent with required

performance, quality, reliability, and safety. Value engineering is typically conducted in two phases. In the design phase, value engineering considers alternative design solutions to optimize the expected cost/value ratio of projects at completion. Concentrating value engineering efforts in the early stages of project design often affords greater savings and allows a change of direction, if appropriate, without affecting project delivery schedules. Emphasis is on obtaining maximum life-cycle value for initial investments of the project. In the construction phase, contractors are encouraged to draw on their experience to propose changes that can reduce costs while maintaining or enhancing quality, value, and functional performance.

MAINTAINABILITY REVIEWS

Many of the schools in LISD are old and have maintenance issues. Many long-term maintenance challenges can be resolved by a review of the designs by personnel familiar with the maintenance of the schools. There is currently limited involvement from the Maintenance and Transportation Director in the review of school concept and design drawings. LISD should document and incorporate facility maintenance and performance reviews by the director. These reviews generally lead to reduced maintenance costs and often lower capital renewal costs over time.

It is generally accepted that the operations and maintenance costs of schools is in the range of two to four times the cost of construction over the life of a facility. Yet, most of the focus continues to be on design and construction. Even value engineering tends to primarily consider the reduction of first-time costs over the long-term maintainability of building systems. The potential to significantly impact the long-term operating costs should be enough to include the Maintenance and Transportation Director in the review of systems and materials to be used in new schools.

COMMISSIONING

LISD has performed some aspects of informal commissioning on previous capital projects. The construction manager works with the various school contractors to test and inspect systems as well as train LISD facilities maintenance staff on the correct operation of the various systems. However, there is a lack of formal processes when the construction manager turns over new assets to LISD for use and occupancy.

Commissioning, in its most basic form, is the process of ensuring that building systems are operating in accordance with the design intent and the owner's requirements. More specifically, commissioning provides the following:

- building systems performance criteria;
- a validated baseline for building performance; and
- a means of tracking and evaluating building performance over time.

New buildings and systems often do not operate as intended. When these systems do not operate correctly, they create problems for building occupants and for those managing the facility. Commissioning these systems ensures the building is performing as initially specified.

Commissioning is typically performed in new and remodeled buildings for a few key reasons:

- to verify that new or existing building systems are operating as designed;
- to identify unexplained rises in energy use;
- to identify an unexplained increased number of thermal comfort complaints; and/or
- to achieve Leadership in Energy and Environmental Design (LEED) certification for buildings.

Commissioning can uncover many building system errors that may not otherwise be found. As an example, commissioning often identifies numerous opportunities for increasing energy efficiency and enhancing operating efficiencies. Some examples include the following:

- ductwork disconnected from diffusers sending conditioned air to the above-ceiling space instead of the space to be conditioned;
- VAV box re-heat valves stuck open, causing over-heating of zones;
- uninsulated conditioned air ductwork located in unconditioned spaces;
- fans rotating backwards;
- lighting controls programmed incorrectly causing lights to stay on longer than necessary;
- cross-connected HVAC sensors, causing systems to over-heat and over-cool;
- clogged filters;

- improperly installed condensate drainage systems resulting in pooling water on the roof and creating the potential for roof damage;
- non-working duct smoke detectors; and
- non-working emergency and exit lights.

Because these problems were discovered and corrected as part of the commissioning process, the building owners gained systems that performed as designed and were safer. These corrections to systems also increased energy efficiency and thermal comfort, cost less to operate, improved the overall safety, and resulted in fewer tenant complaints. With a properly executed commissioning plan, the district can improve building performance, operate systems more efficiently, reduce operating costs, and decrease occupant complaints from the very beginning.

DOCUMENT EXCHANGE, CONTROL, AND MANAGEMENT

Currently, LISD has limited electronic copies of school design drawings and specifications and sporadic O&M manuals and other relevant facilities and equipment information. Proper formatting, organization, referencing, and use of facilities data will not only help maintenance staff improve processes and efficiency, but aid architects and planners in minimizing future renovation costs and possibly improve the functionality and safety of the schools.

Experience has shown that institutional organizations and government agencies across the United States spend billions of dollars unnecessarily to re-collect or regenerate facilities data and information that has already been created in the past. This is information needed to properly operate, maintain, and improve facilities over their life cycle. Today, this information is also used by first responders in cases of emergency and decision-makers to make better decisions about facilities. Easy access to the data is essential.

Building information models (BIM) are changing the way the architectural, engineering, and construction communities design and commission facilities. Three dimensional virtual models allow the end users to have a much better picture of the final building or space. BIMs are proven to reduce the costs of construction changes through clash detection and better fabrication. Whether or not a BIM is used for LISD renovation projects, there is still great value in developing data standards and protocols in accordance with BIM standards to ensure the exchange, control, and management of facilities data.

There are several key issues to making this information most useful. The data need to be complete, comprehensive (right level of detail), standardized, well organized, and readily accessible. Best practices include providing specifications for designers and contractors to follow to generate and format the data. At a minimum, the facilities data compiled for every new school facility should include project specifications and equipment inventories (**Exhibit 5–9**).

EXHIBIT 5–9
FACILITIES DATA

PROJECT SPECIFICATIONS	EQUIPMENT INVENTORIES
• Design Drawings	• Equipment Attributes
• Design Factors/ Assumptions	• Installation Instructions
• Shop Drawings	• Set-up/Calibration Instructions
• As-built Drawings	• Equipment O&M Manuals
• Submittals	• Start-up/Shut Down Procedures
• Warranties	• Spare Parts Data
• Construction Photographs	• Wiring Diagrams
• Commissioning Reports	• MSDS
• General System/Equipment Descriptions	• Preventive Maintenance Procedures
• General Operating Instructions	• Facility Plan with ESO Locations

NOTE: ESO = Emergency Shut-Off (including electrical disconnects and valves); MSDS = Materials Safety Data Sheets.
SOURCE: Review Team, 2011.

Organization and formatting of the electronic data from capital construction projects should make it easy to find the information listed. Currently, documents and drawings for LISD facilities are not well-organized and labeled. Placing documents in directories labeled as "Specifications," "Drawings," and "P.M. Procedures" is best. Drawings should also be labeled and stored as complete sets by architectural system. O&M manuals should be filed in accordance with CSI MasterFormat or Omniclass guidelines. The equipment inventories and preventive maintenance procedures should be in a flat file format or database that can be easily migrated into a computerized maintenance management system (CMMS).

FM INFORMATION STANDARDS

Implementation of an automated work order system requires careful forethought and development of data standards to ensure long-term usability of the system. Many CMMSs fail

because the data are not standardized and maintainable. Proper implementation and the use of data standards will lead to valuable and effective information and work management systems. Because there is currently no CMMS in use at LISD, there is an opportunity to do it right the first time.

Any automated system should be implemented as a tool to support business processes. Thus, it is imperative to document work processes prior to implementing technology. Then, a specific set of data standards should be established to provide the framework for data management. Most often, CSI Uniformat or Omniclass standards are used for creating building information models. These standards provide guidance on defining naming conventions and parameters such as buildings, building systems, equipment, components, work processes, and attributes. Use and enforcement of these standards increases the quality of the data, optimizes the system performance, and enables better reporting.

Decisions about school funding, renovation, modernization, and infrastructure improvements need to be supported by high-quality and timely data.

ENERGY MANAGEMENT AND SUSTAINABILITY PLANS (REC. 28)

LISD has no formal energy management programs or sustainability policies currently in place. While some smaller energy conservation projects have been undertaken—such as limited energy-efficient lighting retrofits, installation of variable frequency drives and programmable thermostats, and installation of occupancy sensors—LISD has a great opportunity for potential energy management and conservation.

In the past, LISD maintained a contract with a private company who served as the energy management facilitator for the HVAC systems. The district reported that the contract was eliminated and LISD installed programmable thermostats at a much smaller cost than the management system. The HVAC system is now controlled locally by the LISD HVAC service technician.

Texas Education Code Section 44.902 states the following: LONG-RANGE ENERGY PLAN TO REDUCE CONSUMPTION OF ELECTRIC ENERGY. (a) The Board of Trustees of a school district shall establish a long-range energy plan to reduce the district's annual electric consumption by five percent beginning with the 2008 state fiscal year and consume electricity in subsequent fiscal years in accordance with the district's energy plan.

Energy management and conservation requires consistent and accurate long-term monitoring of electrical consumption. Interviews with the facilities staff indicated that there were no other formal plans in place for energy conservation projects.

LISD should develop a district energy management program and policy to conserve energy and reduce costs. The policy should be established by the Board of Trustees and senior management and should include general guiding statements and specific energy conservation and building management guidelines. The next step is to develop an energy conservation and management plan based on baseline energy audits. Consideration could be given to developing the plan in conjunction with an energy management consulting firm due to lack of resources and specific energy management expertise in LISD. Another consideration would be to contact the State Energy Conservation Office (SECO) which can provide personalized onsite technical assistance to public schools, preliminary energy assessment services, resources and references, and energy management training. Information regarding SECO's services may be found at www.seco.cap.state.tx.us. The conservation efforts should focus on reduction of usage without additional major capital investments.

It is important for LISD administrators to know which buildings are the least efficient and the performance of each building at different periods of times of the year. Ideally, metering could be installed that could track such data on a much more frequent basis. In the absence of such technology, an individual could be given the responsibility for the manual recording of such data on a pre-determined schedule. That data could then easily be populated into a fairly simple energy management software application or worksheet. There are several commercially available software applications, web-based solutions such as EPA's Energy Star Portfolio Manager, or even simple spreadsheets could be used.

The person in charge of energy conservation programs will then be able to share results with school principals, the Maintenance and Transportation Director, and other key individuals, much like a report card. The district could also choose to involve their students, since school-age youth are increasingly interested in energy conservation. Their enthusiasm can provide lively support to any initiative intent

on reducing carbon footprints and protecting their environment.

FACILITY ASSET MANAGEMENT PLANNING (REC. 29)

LISD's facilities capital renewal expenditures have been somewhat reactive and have not kept pace with the aging school facilities. Major equipment repairs and replacements were reportedly conducted on an as-needed basis as equipment failed, or failed to provide adequate functional support. It appears that a significant amount of capital has been set aside on an annual basis out of the operations budget to help fund very infrequent large capital projects. However, a substantial backlog of deferred maintenance appears to have developed over the time periods between these infrequent large capital projects. Only recently has LISD conducted limited facility condition assessments to prioritize capital investments.

The topic of facility investments and capital planning for school facilities remains at the forefront of the educational facilities executive's world. School organizations across the U.S. are facing the largest collection of aging buildings ever encountered. Deferred maintenance backlogs continue to grow at unprecedented rates, while the toll it has taken on facilities is reaching critical levels. A wealth of research and data are available supporting the need for better facility capital investments and asset management. The benefits of facility condition assessments (FCAs) include the following:

- obtaining objective and credible data to make the rational and informed facilities investment decisions by prioritizing needs;
- streamlining facilities management processes and reducing the total cost of ownership;
- improving the condition of facilities;
- extending the life of assets through proper maintenance and repair funding and decisions;
- minimizing safety and security risks at facilities;
- minimizing the disruption to customers (passengers) and tenants caused by facility system failures by maximizing critical system reliability;
- enabling optimal use of facilities and infrastructure in support of the agency/organizational mission; and
- improving overall stewardship of facilities and maximizing return-on-investment for stakeholders.

LISD does not have a process of periodically assessing facility condition, identifying deferred maintenance backlogs, or evaluating capital needs of the existing facilities. The lack of periodic condition assessments has resulted in a neglect of practices to identify needs and adequately maintain the older buildings. As the schools continue to age, implementing capital planning procedures ensures the effective maintenance and repair of the schools. Failure to do so could result in significant unanticipated capital expenditures, increases in deferred maintenance backlogs, and deteriorating school conditions.

The most important factor for success in assessing the condition of school facilities is to evaluate needs without bias. There are a multitude of reasons to conduct FCAs. Some of the more common outcomes include the following:

- developing and justifying long-term or short-term capital budgets;
- identifying backlogs of deferred maintenance;
- identifying and prioritizing specific capital project needs;
- independently validating capital improvement project requirements; and
- verifying equitable distribution of capital funds among multiple schools.

The primary challenge that public educational facilities across the country have faced is that they have historically underfunded maintenance of capital assets. Compounded by a portfolio of aging schools and infrastructure and the need to constantly modernize building systems and technologies, educational facilities are accumulating backlogs of capital expenditures. Taken together, the accumulated backlog of maintenance and repair is generally referred to as "deferred maintenance."

Concern about the deterioration of educational environments led to a number of collaborative studies by both educational and government associations. The identification and reduction of deferred maintenance has been the primary driving force of asset management programs for educational facilities. The study also led to the development of the Facility Condition Index (FCI), one of the most recognized metrics for facilities asset management performance measurement.

Most public and private school systems generally use some form of facility condition assessment or life-cycle analysis to determine backlogs of maintenance and repair and assess

their facility needs. Findings and recommendations of best practices in facilities asset management (and facility condition assessments) have been researched and reported by the National Research Council independent of the specific approach. Key components to a facilities asset management program include the following:

- standardized documented process that provides accurate, consistent, and repeatable results;
- detailed ongoing evaluation of real property assets that is validated at predetermined intervals;
- standardized cost data based on industry-accepted cost estimating systems (repair/replacement); and
- user-friendly information management system that prioritizes deferred maintenance (DM) and Capital Renewal (CR).

The goal of a facilities asset management program is to conduct facility condition assessments and create a facility investment plan that is rational, repeatable, recognizable, and credible.

Facility asset management plans should independently validate funding requests and provide consistent and credible information to aid in appropriately allocating funding for major facility maintenance projects. The plans should support funding decisions to ensure equitable distribution of funds among schools and ensure proper stewardship of the facilities.

The district should initiate a systematic and periodic facility condition assessment (FCA) process at all facilities to prepare annual facility asset management plans and facility capital needs forecasts. LISD internal facilities management personnel may not have the skills, training, or time to effectively accomplish this task. Thus, if necessary, additional resources (i.e., consultants) could be hired to aid in the comprehensive assessment and program set-up. Outside resources could typically be procured for $.10/s.f. to conduct the assessments. Multiplying $.10/s.f. times the district's total square footage (496,300 s.f.) equates to a one-time cost of approximately $49,630. Phasing the condition assessments by school over time would minimize the financial burden of conducting assessments of all schools at one time. Based on school sizes, this approach would result in expenditures for the assessments of about $8,000 every year until completed.

Alternatively, an asset management plan developed internally may be accomplished, depending on the skills and experience of the Maintenance and Transportation Director. This effort may be achieved with support from the current maintenance staff. The benefit with an internal approach would be to help the director get a better understanding of the overall condition and operating performance of the existing facilities.

PREVENTIVE MAINTENANCE PROGRAM (REC. 30)

LISD's maintenance program is insufficient to provide good long-term stewardship needed to preserve the district's facilities. It consists mainly of breakdown maintenance, corrective actions, responding to demand work requests, periodic HVAC inspections, and filter replacements. The Maintenance and Transportation Director reported most of the department's work was in response to requests and corrective in nature. The Maintenance Department appears to operate generally in a reactive mode. There was very little evidence of completed preventive maintenance (PM) on any equipment beyond the packaged HVAC equipment. Continuing to neglect an investment in a formalized maintenance program will result in inordinate expenditures and a shortened useful life of building systems and schools.

With few exceptions, preventive maintenance has been considered the most effective way of maintaining building systems and extending the service life of equipment. Most PM programs are based on the assumption that there is a cause and effect relationship between scheduled maintenance and system reliability. The primary assumption is that mechanical parts wear out; thus, the reliability of the equipment must be in direct proportion to its operating age.

Research has indicated that operating age sometimes may have little or no effect on failure rates. There are many different equipment failure modes, only a small number of which are actually age or use-related. Reliability Centered Maintenance (RCM) was developed to include the optimal mix of reactive-based, time- or interval-based, and condition-based maintenance.

RCM is a maintenance process that identifies actions that will reduce the probability of unanticipated equipment failure and that are the most cost-effective. The principle is that the most critical facilities assets receive maintenance first, based on their criticality to the mission of the facility or organization dependent on that asset. Maintainable facilities assets that are not critical to the mission are placed in a deferred or "run to failure" maintenance category and repaired or replaced only when time permits, or after problems are discovered or actual failure occurs.

One of the toughest challenges LISD's Maintenance staff face is effectively executing a proactive maintenance program to support the educational mission with very limited staffing resources. This task may also present the facilities organization with one of the best opportunities to enhance efficiency through the use of proven Predictive Testing and Inspection (PT&I) technologies. These technologies can be integrated into the existing program at a relatively low cost and level of effort to optimize the program. In some cases, PM levels of effort have been reduced by 15 percent to 20 percent by eliminating unnecessary tasks or reducing PM frequencies based on empirical condition data.

The investment for a minimal set of PT&I technologies could include the following (specific brands and models provided only for cost comparison):

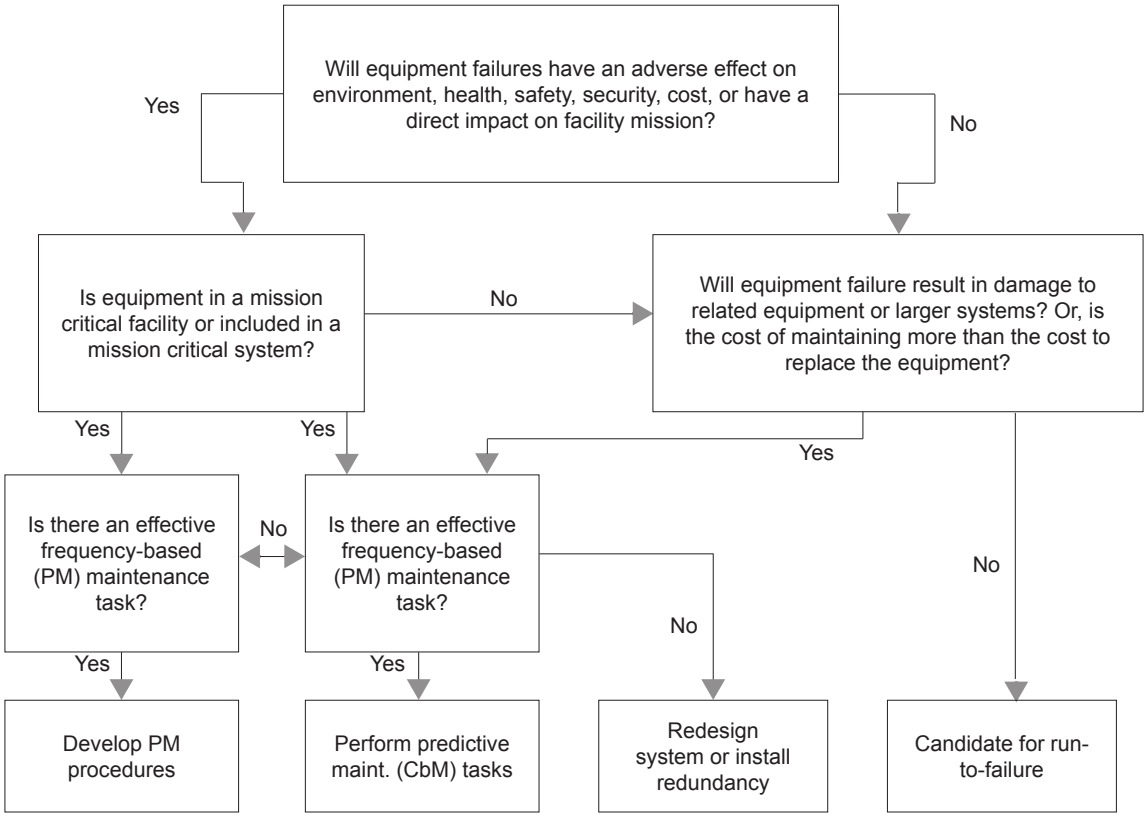
- Spirax/Sarco UP100 Ultrasonic Trap Tester - $1,000;
- DLI Watchman ST-101 Vibration Screening Tool - $3,000;
- FLIR EX320 or new T-Series IR Camera - $8,000; and
- Belt Hog Pulley Alignment Tools - $2,000.

The right type of maintenance for various equipment types can be determined by following a logic-tree decision-making process as shown in **Exhibit 5–10**.

The district should implement a formal and documented comprehensive preventive maintenance program. A comprehensive maintenance program includes the right mix of preventive maintenance (PM), predictive maintenance (PdM), and reactive maintenance (i.e., passive monitoring) components.

To develop a comprehensive preventive maintenance program, LISD facilities maintenance staff should begin by identifying systems and components, prioritizing maintenance activities, developing job plans, and estimating job plan completion times. The existing inventory of rooftop

EXHIBIT 5–10
MAINTENANCE DECISION TREE



SOURCE: Adapted from National Aeronautics and Space Administration, Reliability Centered Maintenance Guide for Facilities and Collateral Equipment, February 2000.

packaged A/C units is a great start. Each activity is further defined below.

Step 1: Identification of Systems and Components – Comprehensive maintenance programs begin with a facilities assessment to identify the various assets' systems and maintainable components. All pertinent information should be collected (i.e., manufacturer, serial #, model #, capacity, size, etc.), and a determination of the present condition made, to establish a baseline. Knowing the age and condition of equipment is a prerequisite for maintaining it properly.

Step 2: Prioritizing Maintenance Activities – Once the facilities data has been compiled, the logic tree described in **Exhibit 5–10** can be applied to help determine to what level each piece of equipment should be maintained. Equipment to be included in the maintenance program should be selected based on the cost of performing advanced maintenance weighed against the cost impact of deferring the maintenance.

Information should be obtained during the data collection process to associate a priority with each system and asset in each district facility. Criticality of each asset should be determined through a review of the system's function, area served, and importance of reliability. The criticality assessment provides the means for quantifying how important the function of a system and its components are relative to the identified mission. A numerical ranking of 1 through 10 can be adopted and applied in accordance with **Exhibit 5–11**. The equipment can then be prioritized based on its criticality of maintaining functionality of the facilities or other predetermined district mission needs. Prioritization becomes important as available resources become more scarce.

The criticality factors for each piece of equipment in conjunction with the logic tree previously outlined can then be used to determine and adjust the level of service attributed to each piece of equipment based upon available resources.

Step 3: Developing Job Plan and Estimating Completion Times – Once the criticality analysis is complete and the appropriate maintenance methods are established for each type of equipment and by location, maintenance tasks for all equipment types should be compiled.

Maintenance tasks should be based on manufacturer's recommendations and/or job plans developed by industry standard publications such as R.S. Means, General Services Administration (GSA), or Whitestone, and adapted based on experience. Detailed tasks, performance times, and frequencies by equipment type should be developed. Care should be taken to format the tasks by a method for future uploading into a computerized maintenance management system (CMMS).

EXHIBIT 5–11
CRITICALITY/SEVERITY CATEGORIES

RANKING	EFFECT	COMMENT
1	None	No reason to expect failure to have any effect on safety, health, environment, or mission.
2	Very Low	Minor disruption to facility function. Repair to failure can be accomplished during trouble call.
3	Low	Minor disruption to facility function. Repair to failure may be longer than trouble call but does not delay mission.
4	Low to Moderate	Moderate disruption to facility function. Some portion of the mission may need to be reworked or process delayed.
5	Moderate	Moderate disruption to facility function. 100% of the mission may need to be reworked or process delayed.
6	Moderate to High	Moderate disruption to facility function. Some portion of the mission is lost. Moderate delay in restoring function.
7	High	High disruption to facility function. Some portion of the mission is lost. Significant delay in restoring function.
8	Very High	High disruption to facility function. All of mission is lost. Significant delay in restoring function.
9	Hazard	Potential safety, health, or environmental issue. Failure may occur with warning.
10	Hazard	Potential safety, health, or environmental issue. Failure will occur without warning.

SOURCE: National Aeronautics and Space Administration, Reliability Centered Maintenance Guide for Facilities and Collateral Equipment, February 2000.

In addition to specific tasks, standard performance times, and frequencies, the job plans should also describe a process for resolving maintenance problems and the specific tools and materials needed. Some problems will be simple and the appropriate corrective action can be included among the other information in the task list. Other problems may not have an obvious solution, and in these cases the responsibility and process for addressing the problem should be clear.

Once a comprehensive list of maintenance tasks is developed, it may be necessary to again look at the prioritization of items or adjust the frequency of tasks to fit staff availability. Because resources are finite, the Maintenance and Transportation Director will need to use some judgment about which tasks are most important. When setting these priorities, it is important to keep in mind the criticality rankings previously determined, so as to not overlook and reduce maintenance on mission critical systems.

The fiscal impact of creating a comprehensive preventive maintenance program is limited to the internal allocation of resources to inventory and set up the job plans. Data collection should be able to be accomplished using internal staff and could be worked into the routine maintenance schedule to avoid a lot of extra effort, providing good internal training regarding the location and type of equipment that should be serviced.

FACILITY MANAGEMENT INFORMATION TECHNOLOGY (REC. 31)

LISD lacks organization of its facilities data and information. The district does not make use of facility management information technology, making it difficult to track performance and obtain good data to make decisions on a campus basis. The implementation of low-cost facility management information technology, such as a computerized maintenance management system (CMMS), helps districts with the organization and tracking of critical data and supports the improved effectiveness and efficiency of facility operations management.

The lack of use of facility management information technology to automate and manage work processes also limits the ability to track performance and obtain pertinent data to make informed decisions on a campus basis. Facility management information technology at LISD is currently limited to a partial e-mail trail of work requests. The work requests are kept for an unspecified duration. Maintenance staff are dispatched by the Maintenance and Transportation Director's administrative assistant via cell phone or radio. There is no feedback mechanism available to the Maintenance and Transportation Director after work has been completed, which impedes the director's ability to track performance and make informed decisions.

There are two general categories of facility management information technology: CMMS and Integrated Work Management Systems (IWMS). Basically, both CMMS and IWMS handle work management processes, with IWMS having added space management capabilities. CMMS are much more efficient at managing requests through their life-cycle when compared to paper-based tracking tools. CMMSs have become increasingly affordable and easy to use. Their purpose is to automate and manage work requests as efficiently as possible and provide the basic information districts need to make informed and timely decisions. The benefits of automation continue to increase and include the following:

- better data management;
- increased efficiency;
- better tracking of asset/equipment histories;
- organized FM data & information;
- expedited decision-making;
- improved maintenance quality/labor tracking;
- improved communication;
- reduced operating costs; and
- enhanced use of facility space.

Many CMMS software packages offer bells and whistles that are not needed for accomplishing the primary mission of implementation. In fact, they often complicate the systems configuration and interface, rendering it laborious to use and maintain. The *Planning Guide for Maintaining School Facilities* published in 2003 by the U.S. Department of Education offers helpful guidelines for evaluating the ever-growing number of CMMS software packages on the market.

Guidelines include the following:

- The CMMS should be network- or Web-based, be compatible with standard operating systems, have add-on modules, and be able to track assets and key systems. Source codes must be accessible so that authorized district staff members are able to customize the system to fit their needs as necessary. In terms of utility, a good CMMS program will include the following:
  - acknowledge the receipt of a work order;
  - allow the maintenance department to establish work priorities;
  - allow the requesting party to track work order progress through completion;

- allow the requesting party to provide feedback on the quality and timeliness of work;
- allow preventive maintenance work orders to be included; and
- allow labor and parts costs to be captured on a per-building basis (or, even better, on a per-task basis).

- At a minimum, work order systems should account for the following:
  - the date the request was received;
  - the date the request was approved;
  - a job tracking number;
  - job status (received, assigned, ongoing, or completed);
  - job priority (emergency, routine, or preventive);
  - job location (where, specifically, is the work to be performed);
  - entry user (the person requesting the work);
  - supervisor and craftsperson assigned to the job;
  - supply and labor costs for the job; and
  - job completion date/time.

Implementation of an automated work order system requires careful forethought and development of data standards to ensure long-term usability of the system. Many CMMS and computer-aided facility management (CAFM) systems fail because the data is not standardized and maintainable. Proper implementation and the use of data standards will lead to valuable and effective information and work management systems. Because there are currently no CMMS/CAFM systems in use at LISD, there is an opportunity to do it right the first time.

Any automated system should be implemented as a tool to support business processes. Thus, it is imperative to document work processes prior to implementing technology. Then, a specific set of data standards can be established to provide the framework for data management. Most often, the Construction Specification Institute (CSI) Uniformat/Masterformat or Omniclass standards, or Omniclass table standards are used for creating building information models. These standards provide guidance on defining naming conventions and parameters such as buildings, building systems, equipment, components, work processes, and attributes. CSI Masterformat classification standards are the industry standard in the United States for classifying building elements during design, specification and construction of facilities. Omniclass standards utilize CSI Uniformat and Masterformat building construction elements and work products as a basis for their table structure. Use and enforcement of these standards increases the quality of the data, optimizes the system performance, and enables better reporting.

Developing a facility management information technology plan will provide the long-term focus needed to successfully select and implement a system and ensure that it supports facility business processes. The most successful CMMS implementations are those where the facility manager had a sound strategic facility management information technology plan, automated broadly, emphasized training, did not try to over-populate the system, had good internal electronic communication in place, had a dedicated automation manager, had buy-in from top to bottom of the organization, understood all costs, and maintained good administrative procedures.

The critical success factors in creating a strategic facility management information technology plan include answers to the following questions:

- Who needs to participate on the planning team?
- Who needs to commit to the objectives of the plan?
- What are the roles of vendors and consultants in preparing a plan?
- What are the predictable dos and don'ts?
- What should be included in the plan?
- Have we set up implementation expectations in the plan?

Typical facility management (FM) technology projects incur problems, such as too much reliance on vendor claims or a sense of urgency that shortcuts methodical implementation. The following lists common steps to be sure to take and to be sure to avoid so that a district gets the desired benefits from FM technology while maintaining cost control:

- Go through the discipline of identifying detailed functionality from FM technology that would benefit both the maintenance department's clients and staff;
- Emphasize training;

- Understand all costs;
- Ask simple questions about how things are done;
- Test applications yourself;
- Try prototypes and get feedback from users;
- Start by fixing small problems to win support;
- Structure big projects so there are payoffs along the way;
- Select your best employees for implementation;
- Settle for 80 percent solutions; and
- Agree on realistic goals.

Common pitfalls include the following:

- Over-populating the database;
- Trying to use a large project to cover costs;
- Setting vague objectives such as "improve productivity";
- Structuring the implementation to avoid conflict;
- Selecting a technical implementation leader unskilled in negotiation;
- Assuming that interviewing users reveals exactly what they need; and
- Emphasizing incremental improvement if what you really need is fundamental change.

The district should consider the purchase and implementation of a simple computerized maintenance management system (CMMS) to help organize, streamline, and document operations and maintenance efforts. Such a system will help minimize redundant effects, better track assets and inventory, support maintenance decision-making, and provide data for facilities performance indicators.

CMMS systems for school districts are typically charged an annual usage fee based on student populations and desired modules. For a school district like LISD, the fiscal impact would be an annual fee of $4,000 and a one-time implementation and training fee of $1,000 for both a web-based work order and preventive maintenance module.

OPERATIONS AND MAINTENANCE TRAINING PROGRAM (REC. 32)

LISD has a limited training program and no specific line-item in the operations budget for training maintenance and custodial staff. Very little outside training appears to have been completed or documented.

The LISD Maintenance Department has used alternate resources for some regulatory and safety training for maintenance and custodial staff. The management firm for LISD's Workers Compensation provides the safety training. In addition, the contracted custodial supply companies provide semi-annual and local training for custodians and supervisors. The training is provided at no cost to the district.

LISD does not currently have a formal O&M training or professional development program. Limited training is offered outside of the basic safety training and required certification training. LISD's 2009 budget did not indicate funds specifically set aside for training. A review of prior year's budgets indicated that only a small portion of the budget, if any, was used by staff for training. Typical recommended training budgets are about 1 percent of the facilities operating expenses. Districts initiate comprehensive training programs by developing individual training and professional development plans to minimize possible on-the-job-accidents, staff inefficiencies, repeat work, and also to ensure that maintenance personnel are knowledgeable in current O&M procedures and techniques.

Best practices show that 4 percent to 6 percent of a facility department's overall operating budget should be spent on training and development. Although most organizations do not spend to this level, this best practice indicates the importance of training. Not investing in ongoing training can result in increased on-the-job accidents, inefficient staff, and required repeat work. Adequate and continuous training is a key step in the development of individual performers and also aids in retention of staff.

Training is the opportunity to educate employees in the most effective way to use the available resources and to ensure that people understand the environmental rules and regulations regarding facilities and grounds. Information can be shared not only about the facilities and spaces but also about the larger district environment and the industry in general.

Generally, there are four basic areas of training focus, including the following:

- new employees in the maintenance and use of the facilities and grounds;

- current employees who have changed task or function;
- all employees when new statutes need to be enforced; and
- all employees when new equipment or tools are purchased.

Managers must think creatively about how to provide high-quality training opportunities in the face of time and budget constraints. *The Planning Guide for Maintaining School Facilities* makes the following suggestions:

- Share training costs with other organizations on a collaborative basis (e.g., training may be sponsored by several neighboring school districts or jointly by the school facilities department and the public works department in the same community);
- Hire expert staff or consultants to provide onsite supervision during which they actively help staff improve their skills while still on-the-job;
- Develop training facilities, such as training rooms in which equipment and techniques can be demonstrated and practiced;
- Offer tuition reimbursement programs that provide educational opportunities to staff who might not otherwise be motivated to improve their knowledge and skills; and
- Build training into contracts so that vendors are obligated to provide training at either an onsite or off-site training center as a condition of the purchase of their products.

Additional suggestions include:

- Use current staff to perform training with respect to their expertise; and
- Compound the effects of training by having employees who have attended training provide internal training to other staff who were unable to attend due to resource restrictions.

Training typically refers to learning opportunities specifically designed to help an employee do his or her job better. "Professional Development" has a broader meaning, which includes expanding a participant's knowledge and awareness to areas outside their specific job duties, yet still related to the overall well-being of the organization.

Exhibit 5–12 identifies the types of training typically included in a comprehensive training program, as well as indications of how such training is generally delivered and who should receive it.

Finally, ongoing evaluation of training efforts, including all aspects of the experience, should be built into the program for educating employees about the facilities and grounds. Good training is timely, informative, and effective; and it keeps teachers, staff, students, and visitors healthy and safe.

The best training evaluations are the summaries of work orders related to the focus of the training. Have the numbers of requests for "the problem area" decreased since training was instituted in regards to that area? Have safety incidents related to facilities decreased? Those items in the work plan that can be directly tied to training issues should be set up on a tracking system to monitor on a regular basis.

This monitoring can serve multiple functions: first, to track the effectiveness of the training; second, to be able to lobby for more money to do more training when the results are good; and third, to help identify areas where further training may be required.

LISD should develop and fund a formal operations and maintenance training/professional development program. The district's Maintenance and Transportation Director should create individual staff training plans for each employee. The program should include the documentation of regulatory required safety and hazardous communications training similar to the training recommendations listed in **Exhibit 5–12**. A comprehensive professional development program should also include some investment in outside training on maintenance best practices to continue to improve the effectiveness and efficiency of the organization. The cost to develop a training program to meet the needs of LISD maintenance staff would be approximately $3,000 per year.

In addition, the Maintenance and Transportation Director should conduct formalized training specific to all job operations and safety related to staff functions. **Exhibit 5–12** also could be used as a guideline to prioritize and select appropriate topics to meet the needs of LISD. Clear documentation of training should be referred to and reviewed periodically to ensure that consistent and updated training is provided and to measure safety improvement practices.

The maintenance staff should document all safety-related training conducted and that these documents be stored at a

EXHIBIT 5–12
TRAINING RECOMMENDATIONS

	Director of M & O	Maintenance Supervisor	HVAC Mechanic	Electrician	Plumber	Carpenter	Maintenance Generalist	Painter	Ground Crew Leader	Grounds Worker	Clerk		Online	Video	Peer Delivered	Outside Provider
Asbestos Awareness	x	x	x	x	x	x	x	x				Regulatory	x			
Bloodborne Pathogens Safety	x	x	x	x	x	x	x	x	x	x	x		x	x	x	
Combustible & Flammable Liquids	x	x	x	x	x	x	x	x	x	x			x	x		
Confined Space Entry	x	x	x	x	x		x						x	x		
Hazard Communications	x	x	x	x	x	x	x	x	x	x	x		x		x	
HAZ MAT Spill Prevention & Control	x	x	x	x	x	x	x	x	x	x			x			
Lock Out/Tag Out	x	x	x	x	x		x						x		x	
Materials Handling, Storage, Use & ID	x	x	x	x	x	x	x	x	x	x	x		x			
Alcohol Free Workplace	x	x	x	x	x	x	x	x	x	x	x	General Training	x			
Back Injury Prevetion	x	x	x	x	x	x	x	x	x	x			x		x	
Building Evacuation & Emergencies	x	x	x	x	x	x	x	x	x	x	x				x	
Emergency Response	x	x	x	x	x	x	x	x	x	x	x				x	
CPR Academic	x	x	x	x	x	x	x	x	x	x			x		x	x
Disaster Preparedness	x	x	x	x	x	x	x	x	x	x	x		x		x	
Electrical Safety	x	x	x	x	x	x	x						x	x	x	
Eye Safety	x	x	x	x	x	x	x	x	x	x			x	x	x	
Fall Protection	x	x	x	x	x	x	x	x					x	x		
Fire Extinguisher Safety	x	x	x	x	x	x	x	x	x	x	x		x	x	x	
Fire Prevention Safety	x	x	x	x	x	x	x	x	x	x	x		x	x		
General Contruction Safety	x	x	x	x	x	x	x	x					x	x		
General First Aid	x	x	x	x	x	x	x	x	x	x	x		x		x	x
Golf Cart	x	x	x	x	x	x	x	x	x	x	x			x	x	
Forklift		x	x	x	x	x	x	x	x	x				x	x	
Bucket Truck		x	x	x	x	x								x	x	
Job Specific Equipment		x	x	x	x	x	x	x	x	x				x	x	
Hand & Power Tool Safety	x	x	x	x	x	x	x	x	x	x			x	x	x	
Hearing Conservation	x	x	x	x	x	x	x	x	x	x			x	x		
Ladder & Scaffolding Safety	x	x	x	x	x	x	x	x	x	x	x		x	x		
Office Safety	x	x	x	x	x	x	x	x	x	x	x		x	x	x	
Cultural Differences	x	x	x	x	x	x	x	x	x	x	x				x	x
Personal Protective Equipment	x	x	x	x	x	x	x	x	x	x			x	x		
Sexual Harassment	x	x	x	x	x	x	x	x	x	x	x					x
Slips, Trips, & Falls Prevention	x	x	x	x	x	x	x	x	x	x	x		x	x		
H.S. Diploma/GED	x	x	x	x	x				x		x	Certification/ Licenses				x
College Degree	x															x
Technical Degree		x	x	x	x											x
Electrical Master/Journeyman				x												x
Plumbing Master/Journeyman					x											x
HVAC Certificate			x													x
On the Job						x		x		x						x
Department Procedures	x	x	x	x	x	x	x	x	x	x	x	General Personnel Practices			x	
Work Practices Time Management/Organization	x	x	x	x	x	x	x	x	x	x	x		x			x
Supervision	x	x							x							x
Employee Relations Counseling, Performance Evaluation	x	x							x							x
Work Order System	x	x	x	x	x	x			x		x		x		x	x

SOURCE: Review Team, 2011.

designated document center for easy access and reference for management and employees alike. When possible, any training provided to the maintenance organization should be recorded for future reference and training opportunities.

OPERATIONS AND MAINTENANCE PERFORMANCE MEASUREMENT (REC. 33)

LISD has not developed performance measures to evaluate its facilities and maintenance (FM) operations. The district maintains little data for the development of operations and maintenance performance measures. Thus, it is difficult to show the successes of the Maintenance Department.

The development of sound data information standards and automating processes enhances facilities performance measurement and the accuracy of Key Performance Indicators (KPI). The objectives of automating work processes are, after all, to increase performance, measure facilities performance, and provide better information to make the best decisions regarding facilities.

The current performance measurement at LISD is limited in scope and requires time-consuming manual data generation through the use of spreadsheets. The performance measurement data provided to the review team included general budget information and school district target data. This data consisted of very limited benchmark information regarding operational costs and capital expenditures per square foot. Districts have great opportunities to improve facilities performance through the development of more specific KPIs aligned with the mission and vision of their district.

Measuring facilities operation's performance in today's environment is the route to credibility. The focus must be on prevention, not cure, and there must be recognizable goals and achievable prioritized objectives. Metrics provide essential links between strategy, execution, and ultimate value creation.

There are many ways of identifying and developing metrics and KPIs for use in school facilities management performance measurement. It is also easy to find samples of hundreds of potential facility maintenance metrics. However, it is not easy to identify and implement the right metrics to link facility operations and maintenance to strategy. The right KPIs should focus on those services that have the most prominent place in LISD's strategic plans. The right mix of KPIs should consider all three aspects of facilities performance:

- Inputs: Indicators that measure the financial, staffing, portfolio condition, and operating impacts from limited budgets/resources, churn and construction and renovation activities.
- Process: Indicators that measure how efficiently the department is performing its key process and tasks.
- Outcomes: Indicators that provide a measure of how successfully the facilities function is performing at the enterprise level.

Educational organizations at the forefront of their industry have developed best practices by using a balanced scorecard approach to KPIs. The balanced scorecard is an approach that integrates financial and non-financial performance measures to show a clear linkage between the institution's goals and strategies. Most balanced scorecards consider four perspectives: customer perspective, process perspective, learning and growth perspective, and a financial perspective. The framework set by the balanced scorecard approach provides an excellent methodology to measure overall performance as facilities managers.

A listing of potential KPIs is presented in **Exhibit 5–13**.

LISD's Maintenance and Transportation Director should develop a limited number of key performance indicators

EXHIBIT 5–13
KEY PERFORMANCE INDICATORS

Input Measures:
- FCI of building inventory;
- maintenance staffing levels (# of FTEs);
- operations funding ($/GSF); and
- capital project funding ($).

Process Measures:
- work orders by type;
- top 10 work order problem codes;
- staff utilization rates;
- PM completion rate (%);
- PM/CM mix (%);
- utility cost/GSF ($/GSF);
- re-work percentage (%);
- work order turn-around time (days); and
- annual building inspections completed (%).

Outcomes:
- cost of operations ($/GSF);
- custodial inspection scores (#);
- change in FCI (%);
- customer satisfaction (%); and
- budget performance (%).

SOURCE: Review Team, 2011.

(KPI) to measure performance and show stakeholders areas of improvement and accomplishments. This task can be performed in coordination with the assistant superintendent of Finance and Operations to ensure alignment with the mission and strategic objectives of LISD. The relevant KPIs drawn from the best practice list shown in **Exhibit 5–13** should be identified over the span of a couple of meetings. The next step is to determine the data required to generate the metrics and how to collect the data. The implementation of a simple CMMS can aid in the collection and reporting of the data to generate the KPIs. This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

	RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 5: FACILITIES USE AND MANAGEMENT								
25.	Develop staffing models for maintenance, custodial, and grounds staff.	$20,000	$20,000	$20,000	$20,000	$20,000	$100,000	$0
26.	Develop/formalize educational space standards and perform space utilization analyses across all campuses to ensure adequate and appropriately used educational and support space.	$0	$0	$0	$0	$0	$0	$0
27.	Formalize and document facilities planning and maintenance policies and procedures to ensure effective planning, construction, operation, and maintenance of the facilities.	$0	$0	$0	$0	$0	$0	$0
28.	Develop a district energy management program and policy to conserve energy and reduce costs.	$0	$0	$0	$0	$0	$0	$0
29.	Initiate a systematic and periodic facility condition assessment (FCA) process for all facilities to prepare annual facility asset management plans and facility capital needs forecasts.	($8,000)	($8,000)	($8,000)	($8,000)	($8,000)	($40,000)	$0
30.	Implement a formal and documented comprehensive preventive maintenance program.	$0	$0	$0	$0	$0	$0	$0
31.	Consider the purchase and implementation of a simple computerized maintenance management system (CMMS) to help organize, streamline, and document operations and maintenance efforts.	($4,000)	($4,000)	($4,000)	($4,000)	($4,000)	($20,000)	($1,000)
32.	Develop and fund a formal operations and maintenance training/professional development program.	($3,000)	($3,000)	($3,000)	($3,000)	($3,000)	($15,000)	$0
33.	Develop a limited number of key performance indicators (KPI) to measure performance and show stakeholders areas of improvement and accomplishments.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 5		**$5,000**	**$5,000**	**$5,000**	**$5,000**	**$5,000**	**$25,000**	**($1,000)**

CHAPTER 6

ASSET AND RISK MANAGEMENT

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 6. ASSET AND RISK MANAGEMENT

School districts are public entities pursuing a public mission. To pursue their mission, the public entrusts them with federal, state, and local funds. In turn, school districts adopt policies, procedures, and tools that enable them to manage the funds and the assets secured with them, effectively and efficiently. School districts must protect the cash they receive and their physical assets, such as buildings, textbooks and equipment, from foreseeable potential risks. Districts manage risk in various ways. While no one can foresee all potential risks, there are standard operating procedures that districts can employ to minimize risk. These include policies; administrative procedures; use of software packages; assignment of specific responsibilities to specific positions; training and evaluation of employee performance; and processes.

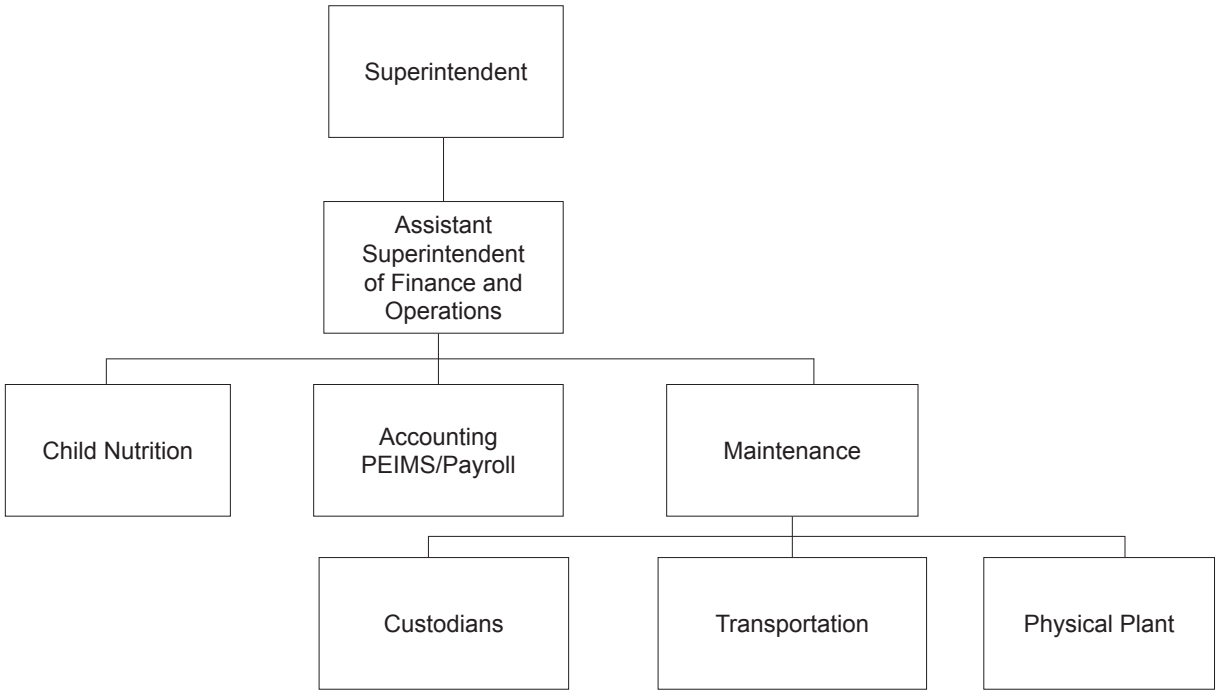
Lamesa Independent School District (LISD) local board policy identifies the superintendent or other person designated by Board of Trustees resolution as the investment officer for the district. The assistant superintendent of Finance and Operations monitors the district's investments and works with the superintendent to ensure that the district invests its funds as directed by the Board of Trustees and in accordance with the district's written investment policy and generally accepted accounting procedures. The assistant superintendent of Finance and Operations also monitors and verifies the collateral pledged to cover the funds in the depository bank. Both the superintendent and assistant superintendent of Finance and Operations have complied with requirements for investment officer training.

The assistant superintendent of Finance and Operations works with the bookkeeper, accounts payable secretary and campus secretaries to ensure that petty cash and cash receipts are properly accounted for, using district forms and procedures. The district generally deposits cash receipts daily. The assistant superintendent of Finance and Operations also works with the bookkeeper to conduct cashflow forecasting on a monthly basis. Because of the district's fund balance and payment schedule, the district has not had to borrow funds and has been able to maximize interest earned on idle funds, which are invested in a local bank. The bookkeeper reconciles all bank accounts monthly, and the assistant superintendent of Finance and Operations reviews the reconciliations.

LISD distributes responsibility for risk management among several employees and areas. However, LISD's assistant superintendent of Finance and Operations assumes primary responsibility for the risk management function in the district as well as the areas listed under his position on the district's school year 2010–11 organizational chart, shown in **Exhibit 6–1**. The assistant superintendent of Finance and Operations and other business office staff reported that his duties include oversight and accounting for assets and oversight of the district's insurance. In addition to the assistant superintendent of Finance and Operations, other employees, notably principals and other managers, also play important roles in the overall asset and risk management function. They maintain inventories and conduct annual audits of fixed assets. The payroll and benefits secretary is responsible for the operations of the health insurance and cafeteria plans, payroll administration, records, and reporting. This position also reconciles the bank statements. The assistant bookkeeper is responsible for accounting for receivables as well as managing cash for extracurricular and other activities.

The main types of insurance are real and personal property and liability coverage, workers' compensation, and employee health. LISD purchases property and liability insurance, as well as student athletic insurance. The district operates a partially self-funded workers' compensation program and pays for a basic plan for employee health insurance coverage as well as providing employees with several employee-funded insurance options.

EXHIBIT 6–1
LAMESA ISD FINANCE AND OPERATIONS ORGANIZATIONAL CHART
SCHOOL YEAR 2010–11



SOURCE: Lamesa ISD, February 2011.

ACCOMPLISHMENT

- LISD secured an interest rate in its current bank depository contract, which exceeds rates available through other mechanisms used by Texas school districts.

FINDINGS

- LISD's bank cannot manage direct deposit. Therefore, LISD is missing the administrative efficiencies that could be achieved by having all its employees on a system of direct deposit.
- LISD lacks adequate controls for managing fixed assets and does not have policies and procedures for timely disposal of surplus property.
- LISD lacks a comprehensive risk management plan that coordinates all information, policies and procedures, and tools to monitor and mitigate potential risks in the district.

RECOMMENDATIONS

- **Recommendation 34: Increase efficiency in payroll administration by establishing a system of direct deposit and achieving 100 percent employee participation in that system.**
- **Recommendation 35: Develop policies and procedures for managing, controlling and disposing of district assets, including documentation of staff responsible for such controls.**
- **Recommendation 36: Create a comprehensive risk management plan that brings together all information, policies and procedures, and tools to monitor and mitigate potential risks in the district.**

DETAILED ACCOMPLISHMENT

INVESTMENT RETURNS

LISD secured an interest rate in its current bank depository contract, which exceeds rates available through other mechanisms used by Texas school districts. The district is currently operating under a depository contract with Lamesa

National Bank that was initiated in 2005 for the 2006–07 biennium and renewed twice thereafter. The district selected a local bank. The district has four Super Now checking accounts with the bank. The employee benefit and the workers' compensation plans, earn interest at the rate of 2.1 percent. The cafeteria fund checking account earns interest at the rate of 0.5 percent, and the operating fund checking account earns interest of 2.7 percent. The district also has two Super Now savings accounts and one regular savings account, all of which earn interest at the rate of 2.7 percent. These interest rates are significantly higher than those paid by other investment mechanisms often used by school districts, such as the Lone Star investment pool and TexPool. As of March 5, 2011, TexPool's rate was 0.2 percent, and TexPool Prime's rate was 0.2 percent.

DETAILED FINDINGS

DIRECT DEPOSIT (REC. 34)

LISD's bank cannot manage direct deposit. Therefore, LISD is missing the administrative efficiencies that could be achieved by having all its employees on a system of direct deposit. Issuing checks for individual employees each pay period is an inefficient means of managing payroll. LISD has low participation in payroll direct deposit, resulting in additional expense for the district in managing payroll. LISD's ability to participate in direct deposit is limited by the capabilities of its depository bank. As a service to employees, a district employee physically transports payroll deposits for employees who bank at financial institutions located in Lamesa. Employees who bank outside of Lamesa deposit their own checks. This results in additional administrative expenses for the district in managing payroll.

As a result of the current arrangement, some district employees are not able to take advantage of the many benefits of direct deposit. These are some of the benefits employees are missing:

- not having to spend the time and effort to physically go to the bank to make a deposit;
- being assured that the possibility of fraud and lost or stolen checks is significantly decreased; and
- knowing that their paycheck has been deposited even if they are out of town, ill, or otherwise unable to go the bank.

LISD is also missing the administrative efficiencies it could achieve from offering direct deposit due to the current arrangements for direct deposit. Three times a month, an employee must hand deliver the deposits to the banks in Lamesa. In addition, three times a month, the district processes separate payroll checks for approximately 300 employees. Electronic processing of direct deposit uses fewer steps than manual processing. This means that it costs less to process and provides fewer opportunities for errors in processing. It also decreases risk of fraud and lost or stolen checks. At the end of the month, it simplifies bank reconciliation because it reduces the number of transactions that have taken place.

For both the employees and the district, direct deposit also has the advantage of being environmentally friendly. National Automated Clearinghouse Association (NACHA) is an industry trade association and administrator of Automated Clearing House (ACH) Network. NACHA concluded in a 2010 study that "in addition to savings, direct deposit drastically decreases an employer's carbon footprint. If a business that employs 300 people and issues paychecks every two weeks switched to direct deposit, in one year, it would save 121 pounds of paper; avoid the release of 1,159 gallons of wastewater into the environment; save 45 gallons of gas; and avoid the release of 346 pounds of greenhouse gases into the atmosphere."

The Association for Financial Professionals estimates that employers save "anywhere from $2.87 to $3.15 per payment by using direct deposit instead of paper checks." The district has published a Request for Proposal (RFP) Notice for Depository Services for September 1, 2011 through August 31, 2013. In it, the district estimated that it issues an average number of 300 payroll checks each month, with another 200 employees being paid through direct deposit. If LISD paid all employees through direct deposit, the district could save from $10,332 to $11,340 per year. The district indicated in the RFP its interest in establishing remote check deposit and payroll cards.

The district should increase efficiency in payroll administration by establishing a system of direct deposit and achieving 100 percent employee participation in that system. At the time of the review in February 2011, the district had issued a Request for Proposal (RFP) Notice for Depository Services to increase employee participation in direct deposit. After the review, district administration indicated the LISD Board of Trustees approved a new depository contract with First United Bank effective September 1, 2011. Direct deposit and a number of additional efficient systems will be available at that time.

Using a conservative estimate, LISD could annually save $10,332 ($2.87 x 300 checks x 12 payments) by implementing this recommendation.

ASSET MANAGEMENT PROCEDURES (REC. 35)

LISD lacks adequate controls for managing fixed assets and does not have policies and procedures for timely disposal of surplus property. The LISD *Business Procedures Manual* (manual) describes the process used to enter controllable and fixed assets into the inventory. It directs district staff to fill out a property card for items with a unit price of $500 to $5,000. It states that there are exceptions to this range. These include overhead projectors, file cabinets, musical instruments, and furniture. The manual states that printers, computers, projectors, VCRs and small tables should be considered supplies. It further states that items over the $5,000 limit will be coded to a 6600 account. The manual does provide a form for tracking assets that move from one location to another or that are to be removed from the district's inventory. However, it does not describe the process and does not address how the district disposes of obsolete and broken items that are no longer useful.

The manual does not describe how controllable technology assets, such as the printers and computers mentioned above, will be inventoried and accounted for. It also does not describe how the district conducts its annual inventory. Finally, neither the manual nor the sample of job descriptions reviewed provided detail about campus staff members' responsibilities for managing assets.

In addition, the process LISD uses to track controllable and fixed assets is currently manual. The Technology Department has secured items to bar code and scan technology assets; however, the department has not yet implemented this method. Also, there are no written procedures to guide district staff in proper disposal of district assets. Currently, the district is storing assets that appear to be obsolete and no longer useful in various locations around the district. The district has teamed with city government to dispose of technology-related assets in the future. However, district staff lack guidance about how to remove both these and other types of assets from the district inventory and how to physically dispose of them. Written procedures will be helpful to principals and other program managers and help the district dispose of assets that are obsolete or no longer needed.

In a publication titled *Banks to Bonds: A Practical Path to Sound School District Investing,* the Texas State Comptroller's office recommends adopting administrative procedures and controls. The document further states: "Many mistakenly believe that policy is procedure, but nothing could be further from the truth. Policy sets broad objectives and guidelines to define the Board of Trustees' intentions and procedures establish the steps necessary to fulfill those intentions. Procedures also create a system of internal controls to ensure that no one deviates from that plan of action." School districts develop and publish regulations in various district documents, including stand alone procedures, forms, and manuals.

LISD should develop policies and procedures for managing, controlling and disposing of district assets, including documentation of staff responsible for such controls. In doing so, the district should investigate the possibility of using bar codes and scanners for all controllable and fixed assets, not just technology. As part of this process, the district should use the *Business Procedures Manual* or other administrative procedures to formally assign responsibility for asset and risk management in employee job descriptions, evaluations, and other written documents. The district should also train employees with responsibilities for asset management in the complete cycle of asset management, from acquisition, through movement, and ending with disposal.

There are several resources that a district can use to help develop administrative procedures. The Texas Association of School Boards (TASB) offers a *Regulations Resource Manual* to districts that subscribe to its Policy Service, as LISD does. TASB provides the following description of the manual on its website: "The *Regulations Resource Manual* is a set of 'generic' model administrative regulations intended for use by superintendents. Because the regulations and forms provided are generic models, you must be prepared to customize them for your district's use; do not assume that you should use them as-is."

This caveat applies to another method which districts can use to develop administrative procedures, which is to search for sample procedures from other school districts. There are two ways to approach this task. One is to identify districts that publish their administrative regulations online at the TASB website, along with their board policy manuals. In order to be published as part of a district's policy manual, the legal department at TASB reviews the regulations beforehand. While this is certainly not a guarantee of either quality or legality, it can help districts consider what features of other districts' regulations might be appropriate for them. Because

school districts in Texas, regardless of size, are charged with the same responsibilities and functions, and are governed by the same laws and rules, sampling other districts' procedures can be a time-saving and economical way for a district to approach developing its own.

TASB organizes both the generic regulations in the *Regulations Resource Manual* and the regulations posted by individual districts along with their board policies online with the same coding system that organizes the policies. This benefits administrators and other stakeholders in a school district, as they can more easily collect the legal framework, local policies adopted by the Board of Trustees, and administrative regulations on a specific topic and view them together. This helps ensure a complete understanding, not only of a specific regulation, but also the legal and local policies related to the regulation and the overall context for the regulation.

A second source for sample regulations is school district websites. Many school districts in Texas have placed their administrative regulations and manuals on either their public website or their intranet. Clear Creek ISD, a large urban/suburban school district with over 35,000 students, and Henderson ISD, with an enrollment about one-tenth of Clear Creek's, have both posted extensive regulations on the public area of their websites. These districts also chose to use the TASB coding system to organize their regulations.

This recommendation can be implemented with existing resources.

COMPREHENSIVE RISK MANAGEMENT PLAN (REC. 36)

LISD lacks a comprehensive risk management plan that coordinates all information, policies and procedures, and tools to monitor and mitigate potential risks in the district. There are specific areas, such as employee wellness and contractor and sub-contractor insurance, that are not addressed in written policies and procedures. In addition, there are areas of weakness related to computers and technology as well as safety and security that a comprehensive risk management plan would address. A comprehensive plan identifies as many potential risks as possible, prioritizes them, and develops policies/procedures and actions to mitigate them.

Larger districts typically employ one or more persons to handle this function. Smaller districts, where risk management duties are distributed across several employees, benefit greatly from a written plan that outlines procedures and responsibilities in detail. For districts such as LISD that do not have an employee to operate their risk management program, it is especially important to have a plan that identifies all responsibilities across departments and offices. At LISD, it is not clear what responsibilities others, such as principals, have in regard to risk management.

LISD employs an Insurance Consultant who is regularly involved in risk management responsibilities, as well as direct involvement with the partially self-funded workers' compensation program and the employees benefit program. The LISD assistant superintendent of Personnel currently has responsibilities related to management of the workers' compensation program; however, this is not documented in the job description for the position. The assistant superintendent of Finance and Operations reported that he oversees most of the other elements in the risk management area; however, at the time of the review in February 2011, the position lacked a written job description that would confirm this.

Because the major responsibilities for risk management in the district are split between two assistant superintendents, the district may potentially miss opportunities to reduce risk. For example, it is not clear who is responsible for implementing safety training and ensuring that employees take appropriate safety precautions. When employees report an injury, their first contact is the payroll and benefits secretary. The assistant superintendent of Personnel monitors the absences and leaves that result from injuries while the assistant superintendent of Finance and Operations monitors the claims for medical and other services. During the monitoring process, no one is formally assigned responsibility to determine what conditions may have contributed to the injuries and what could be done to improve the conditions and prevent additional injuries. When employees return to work with a limitation, such as light duty, it is not clear who works with supervisors to ensure that they appropriately modify their tasks and working conditions.

Similarly, it is not clear who is responsible for involving, educating, and assisting employees with risk management. While the assistant superintendent of Personnel manages benefits, such as family medical leave, the assistant superintendent of Finance and Operations monitors the health insurance program. The district does not have an insurance committee to advise the district in developing leave policies and designing its health insurance program. Each year, the district pursues initiatives to support employee wellness. The district does not assign responsibility for the

wellness program. Instead, initiatives vary from year to year and are not formally evaluated.

The district should conduct a detailed risk assessment. There are professional organizations, such as the Texas Association of School Business Officials (TASBO) that could assist the district with the assessment and make recommendations for a comprehensive plan. TASBO analyzes the following areas when it assists a district with a risk assessment: overall risk management, employee benefits, workers compensation, property and casualty insurance, legal liability, and loss control.

The assistant superintendent of Finance and Operations should begin development of a risk management plan for the district by first collecting information in his areas of responsibility. These include employee health insurance and other benefits, a partially self-funded workers' compensation plan, student insurance, and property and casualty insurance.

Then, the assistant superintendent of Finance and Operations should work with other managers in the district, including principals and representatives from the district's property and liability insurers, to collect information in the other areas that should be included in a comprehensive risk management plan. These include employee wellness, contractor and sub-contractor insurance, and insurance for outside groups using the district's facilities. None of these areas is currently addressed in written procedures.

LISD should then combine this information collected inside the district with information from outside the district. This should include both best practices and legal requirements. There are several organizations that can provide assistance and resources regarding legal requirements and best practices in the risk management area. **Exhibit 6–2** provides information on some of these resources.

The district should create a comprehensive risk management plan that brings together all information, policies and procedures, and tools to monitor and mitigate potential risks in the district. The plan should include training and other mechanisms for communicating the plan to all employees in the district as well as involving employees in the development of the plan. LISD should review, update, and create job descriptions as needed to identify responsibilities for asset and risk management and to ensure that it evaluates employees with identified responsibilities. The LISD Board of Trustees should approve the plan, and the district should annually evaluate the plan to determine what updates and changes, along with additional training are needed. An insurance committee, comprised of employees from each campus in the district, should assist the district in designing an employee wellness program and ensuring that it is consistently delivered and evaluated annually.

This recommendation can be implemented with existing resources.

EXHIBIT 6–2
RISK MANAGEMENT RESOURCES

RESOURCE	DESCRIPTION	WEBSITE ADDRESS
Public Entity Risk Institute	National nonprofit organization committed to assisting small local governments in risk management	www.riskinstitute.org
Public Risk Management Association	An association of public sector risk managers	www.primacentral.org
Risk Management for Public Entities	Publication on risk management issued as a part of the Insurance Institute of America's Association in Risk Management certificate program	www.aicpcu.org
Texas Schools Risk Managers Association	An association providing assistance to Texas school districts, educational service centers, universities, and colleges with information on risk management.	www.txsrma.org/missionstatement.htm

SOURCE: Review Team, February 2011.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 6: ASSET AND RISK MANAGEMENT							
34. Increase efficiency in payroll administration by establishing a system of direct deposit and achieving 100 percent employee participation in that system.	$10,332	$10,332	$10,332	$10,332	$10,332	$51,660	$0
35. Develop policies and procedures for managing, controlling and disposing of district assets, including documentation of staff responsible for such controls.	$0	$0	$0	$0	$0	$0	$0
36. Create a comprehensive risk management plan that brings together all information, policies and procedures, and tools to monitor and mitigate potential risks in the district.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 6	**$10,332**	**$10,332**	**$10,332**	**$10,332**	**$10,332**	**$51,660**	**$0**

CHAPTER 7

FINANCIAL MANAGEMENT

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 7. FINANCIAL MANAGEMENT

School districts manage resources according to law, policy, and regulation. Districts use staffing, reporting, administrative software and other tools, and external audit and tax appraisal and collection services to ensure the public that the district is effectively and efficiently managing its fiscal resources. The Texas Education Agency's (TEA) state administrative regulations in the Financial Accountability System Resource Guide (FASRG) help districts self-monitor and assist other organizations in providing external monitoring of districts. In addition, TEA monitors districts' financial management through analysis of district submitted data via the Public Education Information Management System (PEIMS) and reviews of annual external audits and other required reports. Each year, TEA also issues a rating of individual districts' financial management in the Financial Integrity Rating System of Texas (FIRST).

The Lamesa Independent School District (LISD) has earned a FIRST rating of superior achievement in each of the most recent three years reported. However, in its Financial Allocation Study for Texas (FAST), the state comptroller's office assigned the district a rating of two out of five possible stars. The FAST rating is a combination of a spending index and a composite progress percentile, based on student performance. The district's FAST spending index is average, but its progress percentile is 5, indicating that the district has made as much or more progress than just 5 percent of Texas school districts. LISD has a general operating fund for school year 2010–11 of $15 million and had a fund balance at the end of school year 2009–10 of $16 million. District practice in recent years has been to designate $5 million annually for instructional and facilities improvements and to keep three months of operating expenses in the fund balance. As a result, the district fund balance has exceeded the state's optimal fund balance calculation in each of the last five years. The state's optimum fund balance is defined in the FASRG as the average of two months of operating expenditures.

The district has not issued bonds in over 20 years. Therefore, it levies only a maintenance and operations (M&O) tax, which, due to a tax ratification election in 2008, is $1.17. The district contracts with the county tax appraisal office to collect their M&O taxes. The office deposits taxes collected into a district account each week. The district's M&O tax collection rate for the most recent three years has been greater than 99 percent.

The assistant superintendent of Finance and Operations is responsible for the district's financial management. The assistant superintendent manages five employees in the Central Office. Four of them, the bookkeeper, payroll and benefits secretary, accounts payable secretary, and PEIMS secretary, have financial management duties. Specifically, these employees are responsible for the following financial operations: accounts payable, payroll, campus enterprise accounts, budgeting, and accounting. In addition, they work with the district's external financial auditor to ensure that the district's annual audit is complete, accurate, and timely. They also work together with the program managers and campus administrators as well as program and campus secretaries to plan, record, and report financial transactions that support the district's educational mission.

LISD's adopted budget for school year 2010–11 was $14.6 million, of which $7.5 million, or 51 percent, was for instruction. The budget planned for $15 million in revenue, most of which comes from the state, $10 million, and local property taxes, $5 million. The district also benefits from county available funds. County available funds are derived from the sale or management of lands the state of Texas provided to counties for educational purposes. Just as the State Board of Education manages and invests the state Permanent School Fund, Dawson County manages and invests the county school permanent fund, dispensing interest and revenue earned to each of the school districts in the county. The funds dispensed are commonly referred to as the "county available fund." For school year 2010–11, the district budgeted $257,000 in county available funds. **Exhibit 7–1** provides summary information about LISD's general fund for the most recent five years.

EXHIBIT 7–1
LAMESA ISD GENERAL FUND SUMMARY
ACTUAL REVENUES/EXPENDITURES FISCAL YEARS 2007 TO 2010 AND ADOPTED BUDGET 2010–11

YEAR	REVENUES	EXPENDITURES	OTHER SOURCES (USES)	CHANGE IN FUND BALANCE	ENDING FUND BALANCE
2007 Actual	$16,508,062	$13,488,392	($5,091,430)	($2,071,760)	$9,735,913
2008 Actual	$15,171,514	$14,886,626	($796,348)	$611,866	$10,380,565
2009 Actual	$18,964,589	$15,250,797	($27,924)	$2,680,233	$13,060,798
2010 Actual	$17,716,028	$14,661,313	($2,422)	$3,052,293	$16,113,091
2010–11 Budget	$15,020,023	$14,575,346	$0	NA	NA

SOURCE: Lamesa ISD, Audited Financial Statements, year ending August 31, 2007 to 2010, Adopted Budget 2010–11, February 2011.

ACCOMPLISHMENT

- LISD has maximized state and local revenue by conducting a successful tax ratification election in October 2008.

FINDINGS

- LISD does not have a fund balance board policy.
- LISD lacks a comprehensive budget development process with full stakeholder participation.
- LISD has limited staff development for business services staff.
- LISD does not have written administrative procedures for accounting and payroll.
- LISD lacks an audit rotation policy. The district has not rotated the external financial audit firm in more than 20 years.

RECOMMENDATIONS

- **Recommendation 37: Create a formal board policy regarding the district's fund balance.**
- **Recommendation 38: Continue to improve the budget development process by documenting procedures and collecting documents in a budget development manual.**
- **Recommendation 39: Determine staff development needs for business services staff and develop a monitoring plan to provide such staff development.**
- **Recommendation 40: Develop an accounting and payroll manual.**
- **Recommendation 41: Create a local policy regarding external audit firm selection and rotation that reflects best practice and ensures audit firm rotation at least every five years.**

DETAILED ACCOMPLISHMENT

TAX RATIFICATION ELECTION TO MAXIMIZE STATE AND LOCAL REVENUE

LISD has maximized state and local revenue by conducting a successful tax ratification election in October 2008. In a 2006 special session, the Texas Legislature redefined the rollback rate for school districts. The redefinition resulted in a cap of a school district's maintenance and operations (M&O) rate at $1.04. The law enabled districts to go above this cap by holding a tax ratification election (TRE). In 2008, LISD trustees voted to adopt an M&O rate of $1.17, the highest allowed by law, and authorized a TRE to determine if the voters would approve of the higher rate. In 2008, LISD was one of 71 districts successful in this appeal. Another 46 districts held a TRE but were not successful. LISD voters approved the TRE by over 70 percent. This indicates that the district was successful in communicating the need to the electorate. In particular, the district was able to inform voters of the measures already taken to be as efficient as possible. Out of 1,025 school districts in the state, only 226 have conducted a successful TRE, enabling them to adopt a tax rate above $1.04. LISD is the only school district in Dawson County that has conducted a TRE since the change in law in 2006.

As a result, LISD secured more local and state funding in school years 2008–09 to 2010–11. The additional state funding has amounted to about $700,000 per year. This has helped the district pursue its "save and spend" approach to maintaining and upgrading its facilities. The district has

made improvements to three campuses, two additional facilities, and the Central Office since 1998.

DETAILED FINDINGS

FUND BALANCE POLICY (REC. 37)

LISD does not have a fund balance board policy. The district's fund balance is significantly more than the optimum as recommended by the Texas Education Agency (TEA). Related to this is the fact that LISD has not incurred bonded indebtedness for over 30 years and has not, therefore, received state aid for maintaining and upgrading facilities. Instead, the district has pursued a "save and spend" strategy for its facilities.

The district embarked on a facilities upgrade program in 1998. Since that time, the district has renovated three of its schools and built a fieldhouse for the high school. These projects have cost the district approximately $13.8 million. Up to the most recent complete year, 2010, a twenty year bond issue, had it been approved by the voters in 1998, would have cost the district approximately $4 million over the period between 1999 and 2010. Of that, the district might have received about $2.1 million, or 52.7 percent of the debt payments, from the state in the form of an existing debt allotment (EDA). However, the district's taxpayers would have had to pay about $1.7 million for the district's portion of the debt payments. Under another scenario, had the voters approved a twenty year bond issue in 2005, the state's share over the period from 2006 to 2010 via the EDA would have been approximately $497,898, or 24.2 percent of the debt payments, but the district's share would have been about $2.1 million. During this time, the district would not have been eligible for another source of state assistance for facilities, the Instructional Facilities Allotment (IFA). Overall, because of limitations on the district's eligibility for EDA and IFA for the previous projects, the "save and spend" strategy has cost the district less than incurring debt would have.

Currently, however, the district has identified additional needs for major improvements to the high school campus and upgrades to the heating and air conditioning systems at all facilities. The district conducted a bond election in May 2011 in order to help finance these projects, which it estimated would cost $25.6 million. The district asked voters to approve a bond issue of $15 million and planned to supplement this with fund balance and county available funds. The county available funds would come from the county permanent school fund itself, not the annual interest received by the district. The Texas Constitution allows the county to reduce the fund and distribute the reduction to school districts for the purpose of making permanent improvements. The sixty percent of the voters participating in the bond election rejected the bond proposal. As a result, LISD must consider how and how much to scale back its proposed projects. Improvements to the high school are of critical importance, as they affect health and safety, as well as the ability to deliver the prescribed curriculum.

Exhibit 7–2 presents the district's fund balance for four years as a percent of the budget. While funds in a district's undesignated unreserved fund balance are available for both current and future operations, they are generally expected to be used in the future. Their use is not restricted by prior action by the Board of Trustees.

EXHIBIT 7-2
LAMESA ISD DESIGNATED, UNDESIGNATED AND OPTIMUM FUND BALANCES
FISCAL YEARS 2007 TO 2010

	2007	2008	2009	2010
General fund balance	$9,735,913	$10,380,565	$13,060,798	$16,113,091
Designated fund balance	$5,000,000	$5,000,000*	$5,000,000*	$5,000,000*
Undesignated unreserved fund balance	$4,735,913	$5,380,565	$8,060,798	$11,113,091
Fund balance as percent of next year's budget	31%	33%	49%	76%
Optimum fund balance and cash flow	$7,856,917	$8,456,813	$8,068,587	$9,255,299
Excess undesignated unreserved fund balance	$1,878,996	$1,923,752	$4,992,211	$6,857,792

*Amount is different from the Designated Fund Balances in the "Notes to the Financial Statements" of the annual financial reports for fiscal years 2007 to 2010. The amount of designated fund balance in the notes for each of the years is $4.4 million for construction and $3 million for Instructional Improvements.
SOURCES: Schedules C-1 and J-3 of Lamesa ISD annual financial reports 2007 through 2010; Texas Education Agency Snapshots, 2007 through 2010.

The Board of Trustees may pass a resolution to earmark some unreserved fund balance by designating it for specific purposes. Such designated fund balance funds are not available for general operations in the future unless the Board of Trustees amends the prior resolution through future Board of Trustees action. **Exhibit 7–2** also shows the optimum fund balance, calculated according to TEA's guidelines, the undesignated fund balance, and the designated fund balance for fiscal year 2007 through 2010. Each year, the district's undesignated unreserved fund balance was in excess of its optimum fund balance by a significant amount, ranging from $1.9 million in 2007 to nearly $6.9 million in 2010. Also, each year the district designated $5 million from its fund balance to two special purposes, facilities and instructional improvement.

There are two written explanations that the district has provided for the excess in the fund balance over what the optimum fund balance is, according to TEA's guidelines. The first is in the "Management's Discussion and Analysis" that is part of the annual financial audit. The district stated in the "Management's Discussion and Analysis" for the 2007, 2008, and 2009 financial audits: "Lamesa ISD continues with efforts to build designated fund balance in order to complete capital projects. This save and spend philosophy has worked well in recent years and allowed the district to avoid finance costs. The district will maintain the $3 million designated fund balance in the Instructional Improvement Fund and Capital Improvement Fund designated for facilities improvement at $2 million in 2010–11. The district also strives to maintain three months operating expenses in unreserved and undesignated fund balance." The second explanation is a note to Exhibit J-3 in the annual financial audits for 2006 through 2008. The note states, "District strives to maintain three months operating funds in unreserved and undesignated fund balance." In the 2010 audit, these two statements were changed to state that the "District strives to maintain six months operating funds in unreserved and undesignated fund balance." None of these documents is readily accessible to the general public, and the district has not provided a written explanation as to why it changed its goal from three months to six months.

The Governmental Accounting Standards Board (GASB) issued *GASB Statement 54*, *Fund Balance Reporting and Governmental Fund Type Definitions* in 2009. It replaces the fund balance categories previously used in public accounting. Beginning with the 2010–11 school year, districts in Texas will implement the new definitions for the fund balance; however, the concept of an optimum fund balance will remain.

The district should create a formal board policy regarding the district's fund balance. The LISD Board of Trustees and administration team should develop a fund balance policy that communicates what general fund balance the district desires to have. The policy should incorporate the new definitions from *GASB 54*. The Board of Trustees should formally adopt the policy. This will help communicate the district's reasons for its fund balance and help assure stakeholders that the district has developed a long range plan for how to use it.

This recommendation can be implemented with existing resources.

BUDGET DEVELOPMENT PROCESS (REC. 38)

LISD lacks a comprehensive budget development process with full stakeholder participation. During the review visit, project managers and a former campus administrator reported that in developing budgets for years prior to 2011, they did not have input into the budgets they were charged with managing. They reported that their budgets would be given to them already developed with limited additional information provided. In addition, community members reported that when they participated in meetings where budgets were discussed, they understood little and did not feel included in the process. Rather, they said they felt that the district had invited them only to approve what had already been developed, not to provide input or gain understanding. As a result of this lack of meaningful input, budget managers found that they amended their budgets more often than they felt should have been necessary. It appears that neither district nor community stakeholders were able to fully participate in the budget development process. For the 2011–12 budget cycle, the assistant superintendent of Finance and Operations has developed a budget planning process and calendar that invite the involvement of all district staff. The review team found that program managers were especially appreciative of the process as outlined in district documents.

While the process for developing the school year 2011–12 budget is an improvement over previous district practice, LISD should continue to improve the budget development process by documenting procedures and collecting documents in a budget development manual. While engaging in this process, the district should incorporate budget guidelines, priorities, and the calendar. The current budget

planning process lacks context and guidelines to help participants in the process understand what opportunities and limitations the district is facing. For example, in school year 2011–12, all school districts are expecting a significant decrease in both state and federal funding.

The budget development process is complex and can be confusing to stakeholders, including community members whom the district has a responsibility to meaningfully involve. While not a requirement, a budget calendar is a best practice that helps everyone know not only what will happen and when but also why. The Texas Education Agency (TEA) provides guidelines for developing school district budget calendars in the Financial Accountability System Resource Guide (FASRG). LISD should compare the Budget Process document used this year to provide a timeline of activities with a more detailed budget development calendar, such as the sample in the Budgeting Module of the FASRG. Using FASRG guidelines, the district should continue to develop and use a comprehensive calendar and should also share it with staff members and other stakeholders involved in the budget development process. The district can increase involvement of the Board of Trustees by presenting the budget calendar to them for their approval and to inform the community and encourage full stakeholder participation.

This recommendation can be implemented with existing resources.

BUSINESS SERVICES STAFF DEVELOPMENT (REC. 39)

LISD has limited staff development for business services staff. The district has an experienced staff in the business office. However, experience alone cannot ensure compliance with the law, state rules, regulations, board policy, and administrative procedures that govern business operations in school districts in Texas. Also, experience alone cannot prevent errors in financial management. Business staff members who are formally trained are apt to better understand the need for internal controls and take initiative to ensure that controls are in place. This is a best practice widely noted in both the private and public sectors. LISD business staff indicated to the review team that the district has provided training on how to use the district's business software, the Regional Service Center Computer Cooperative Business System, (RSCCC), through a contract with Regional Education Service Center XVII (Region 17). Staff reported attending the Texas Association of School Business Officials (TASBO) annual conference in school year 2010–11; however, district staff could not recall any other training from other providers. While training in the administrative software can help employees understand the need for internal controls, many controls occur before the data is entered into the system, and the software training may not adequately address them.

As a general practice, school districts provide training to business services staff, just as they do teachers and administrators. Training ensures that staff members are informed of changes in laws, rules and regulations, especially those in the FASRG. Districts find that this training is available from several sources, including regional education service centers, organizations such as the TASBO, the Texas Association of School Boards, regional education service centers, universities, and private providers. Often, training is available locally or within a reasonable distance.

LISD should determine staff development needs for business services staff and develop a monitoring plan to provide such staff development. As part of this process, the district should conduct a needs assessment of training needs based on both employee input and offerings routinely available. The district should develop a plan to provide ongoing staff development to business office employees and should budget for this expense. As a result, district accounting and payroll staff will better understand their responsibilities, especially in regard to internal controls, and will be able to suggest process improvements that will help ensure that the district is in full compliance with the law, regulations, and standard procedure. Staff members should attend training in their areas of responsibility and then cross-train other staff to assume their duties in the event of absence, emergency, or separation from the district.

The fiscal impact of this recommendation is calculated based on four staff members attending two and one-half days of training per year, for a total of 15 hours. The cost for each day, assuming that the training requires overnight travel, would include $210 for registration per person and another $363 for travel (lodging at $85 per night x 3 nights + food at $36 per day x 3 days). The total would be $2,292 per year ($573 per employee x 4 employees).

The district could decrease training costs if the administration chose to make use of online courses and webinars, for which there would be no travel expense and no additional compensation costs for employees not exempt from provisions of the Fair Labor Standards Act (FLSA). With the exception of the assistant superintendent of Finance and Operations, business office employees are all subject to the

FSLA. The district should consider the cost of employee time to participate in online courses, whether during working hours or in overtime compensation or compensatory time.

ACCOUNTING AND PAYROLL ADMINISTRATIVE PROCEDURES (REC. 40)

LISD does not have written administrative procedures for accounting and payroll. While the review team noted that accounting and payroll staff follow procedures consistent with provisions for accounting and payroll in the FASRG, these procedures are not documented. In addition, district administrators shared that the district has enjoyed continuity and longevity in staffing the business office, but that some business office staff members may retire in the near future. The district has an informal succession plan for business office staff that has included cross-training of different individuals and formal assignment of duties should a staff member be absent due to emergency or illness. However, these measures are not enough to ensure continuity in the event of either employee absence or separation from the district.

The Government Finance Officers Association (GFOA) identifies documenting accounting policies and procedures as a best practice. It further states, "procedures should be described as they are actually intended to be performed rather than in some idealized form. Also, the documentation of accounting policies and procedures should explain the design and purpose of control related procedures to increase employee understanding of and support for controls."

At the time of the onsite review in February 2011, LISD did not have an accounting and payroll procedures manual, but subsequently provided the review team with a two-page document that outlines written procedures for payroll. LISD should develop a comprehensive accounting and payroll manual. The manual should include a complete set of procedures for the accounting and payroll staff in the business office. These should adequately and completely capture all current processes, controls, and supports, in a manner similar to the PEIMS student accounting procedures in the district's Secretary Information Handbook. The district should consider making these procedures available on an intranet, as this allows the district to easily update them without having to print and distribute new copies and also assures their ready availability when needed. The district can use these procedures to enhance cross-training and reduce the learning curve and potential problems for employees who assume accounting and payroll duties, either temporarily or permanently. The assistant superintendent of Finance and Operations should oversee the process of developing, publishing, revising, and annually reviewing the procedures.

This recommendation can be implemented with existing resources.

EXTERNAL AUDIT FIRM POLICY (REC. 41)

LISD lacks an audit rotation policy. The district has not rotated the external financial audit firm in more than 20 years. During that time, the firm has changed ownership. The firm does not have a contract with the district; the district has utilized an annual engagement letter to establish the services desired and the cost. The district has not compared the audit price to other firms and, until this year, has not issued a request for proposals (RFP) for audit services.

Because the current audit firm is small, it must contract with others to provide the number of qualified staff needed to conduct the annual audit for the district. In January 2011, the LISD Board of Trustees directed the administration to issue an RFP for audit services. The board has not provided guidance in local policy to assist in this process. After the onsite visit conducted for this review, district administration indicated that LISD approved a new audit firm to conduct the district's annual audit.

The GFOA issued a "Best Practice" white paper, *Audit Procurement,* in 2002. The GFOA recommends that governmental entities "enter into multiyear agreements of at least five years in duration when obtaining the services of independent auditors." The GFOA states that multi-year agreements can provide continuity, lessen disruption, and reduce audit costs.

The GFOA further states that "ideally, auditor independence would be enhanced by a policy requiring that the independent auditor be replaced at the end of the audit contract." However, the GFOA acknowledges that "the frequent lack of competition among audit firms fully qualified to perform public-sector audits could make a policy of mandatory auditor rotation counterproductive." While there is no requirement in law for school districts to change firms periodically, Section 203 of the Sarbanes-Oxley Act mandates a change in auditors in the public sector at least every five years. The Auditing Module of the FASRG specifies five years in its Appendix 1-Sample Request for Qualifications. This period may strike the best balance between the continuity an audit firm may desire in order to keep costs down and the independence that districts and the public desire in order to

have full confidence in audit reports. In addition to increased public confidence, the potential benefits to school districts of auditor rotation include having the perspective of a different firm, assurance of auditor independence from school district influence, and confidence that the district is getting the best value for its audit services.

LISD should create a local board policy regarding external audit firm selection and rotation that reflects best practice and ensures audit firm rotation at least every five years. The Board of Trustees and administrative team should work together to develop a local policy for selection and rotation of audit firms. The policy should reflect best practice. It should establish that the district expects to rotate its audit firm at least every five years and should state whether the district will use a single or a multi-year engagement. If it expects to use a single year engagement, the policy should specify that the engagement letter will not include a provision for automatic renewal. The district's policy should also establish that the district will consider an audit firm's capability to conduct a quality audit as the prime factor in selection of a firm. Finally, the policy should state that the district will avoid securing significant non-audit services from its independent auditors in order to support their independent status.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 7: FINANCIAL MANAGEMENT							
37. Create a formal board policy regarding the district's fund balance.	$0	$0	$0	$0	$0	$0	$0
38. Continue to improve the budget development process by documenting procedures and collecting documents in a budget development manual.	$0	$0	$0	$0	$0	$0	$0
39. Determine staff development needs for business services staff and develop a monitoring plan to provide such staff development.	($2,292)	($2,292)	($2,292)	($2,292)	($2,292)	($11,460)	$0
40. Develop an accounting and payroll manual.	$0	$0	$0	$0	$0	$0	$0
41. Create a local policy regarding external audit firm selection and rotation that reflects best practice and ensures audit firm rotation at least every five years.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 7	**($2,292)**	**($2,292)**	**($2,292)**	**($2,292)**	**($2,292)**	**($11,460)**	**$0**

CHAPTER 8

PURCHASING AND TEXTBOOKS

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 8. PURCHASING AND TEXTBOOKS

School districts in Texas must abide by federal and state laws, rules, and procedures regarding purchasing. Districts must abide by provisions in Chapter 44 of the Texas Education Code and may participate in purchasing cooperatives as outlined in the Texas Government Code. The Texas Education Agency (TEA) provides a purchasing module in the Financial Accountability System Resource Guide (FASRG) to assist districts in self-monitoring for compliance with the various requirements. Adhering to requirements imposed by outside agencies is a necessary but insufficient means to ensure that a school district is effective and efficient in its purchasing activities. In addition to ensuring that it uses competitive and legal processes to obtain goods and services, a school district must ensure that it is meeting district needs and that students and employees are receiving the intended benefits.

The Lamesa Independent School District (LISD) assistant superintendent of Finance and Operations oversees the purchasing function. LISD provides a *Business Procedures Manual* (manual) to help guide principals and program managers in purchasing goods and services. LISD also participates in several purchasing cooperatives that assist district staff in locating the best pricing while simultaneously adhering to applicable law and policy.

LISD does not have a true warehouse; however, there is a facility that houses maintenance, custodial and transportation stock required by these departments. It is managed by the district's Maintenance and Transportation Director, who reports to the assistant superintendent of Finance and Operations. Maintenance employees provide services as needed. Maintenance staff members also manage receiving and distribution of bulk paper orders and receiving of large orders, such as textbooks and large technology equipment. Otherwise, the district arranges for supplies and materials for campuses and other areas, including most technology equipment, to be received and managed at the sites. LISD Maintenance Department personnel deliver textbooks to the appropriate campus upon receipt by the district, and campus textbook coordinators are responsible for textbooks and other materials after delivery. The Maintenance and Transportation Director works with the bookkeeper in the Central Office to coordinate recordkeeping for fixed and controllable assets.

The LISD assistant superintendent of Personnel oversees the district's textbook operations. The district has assigned an assistant principal at each campus to act as a textbook custodian. They are responsible for supplying textbooks to teachers as needed and ensuring that charges are levied for lost, misplaced, and damaged textbooks.

LISD enters into multiple contracts with various vendors and suppliers. **Exhibit 8–1** provides a representative list which illustrates the variety of contracts currently in force in the district.

EXHIBIT 8–1
REPRESENTATIVE LIST OF LAMESA ISD CONTRACTS AND AMOUNTS
SCHOOL YEAR 2010–11

CONTRACTED SERVICE PROVIDED	TOTAL CONTRACT AMOUNT
Curriculum management system	$10,015
Early reading assessment software	$6,350
Education service center services	$56,222
Food service program management	$77,046*
Professional services, consultation, and technical support for the Rural Technology Pilot Cycle 3 grant application	$16,480
Special education administrative software	$9,000
Technical assistance with state and federal special programs and compliance	$9,000

*Estimated fees based on 2010–11 budget.
Source: Lamesa ISD, February 2011

FINDINGS

- LISD does not have comprehensive written procedures for purchasing.
- LISD does not have comprehensive policies and procedures for management of textbooks.
- LISD does not have a documented process for management of contracted services.

RECOMMENDATIONS

- **Recommendation 42: Continue to develop administrative procedures regarding purchasing, expanding them to ensure that they provide comprehensive treatment of the purchasing function, including relevant forms.**
- **Recommendation 43: Develop comprehensive textbook management policies and procedures.**
- **Recommendation 44: Develop administrative procedures for management of contracted services.**

DETAILED FINDINGS

PURCHASING PROCEDURES (REC. 42)

LISD does not have comprehensive written procedures for purchasing. Currently, district staff members rely on two sources of documentation to guide purchasing: the Business Procedures Manual and the Secretary Information Handbook. The manual is available on the district website, but it is not comprehensive. **Exhibit 8–2** compares FASRG-recommended components for a purchasing manual with the purchasing elements currently in district documents.

The FASRG states, "Every school district, large and small, should have a written manual describing its purchasing policies and procedures." Without a complete manual, employees are less likely to ensure that purchasing is consistent with state and federal laws, rules, and regulations as well as local policy and regulations. A purchasing manual can be a separate document or it can be part of a larger financial accounting manual, such as LISD's manual.

LISD should continue to develop administrative procedures regarding purchasing, expanding them to ensure that they provide comprehensive treatment of the purchasing function,

EXHIBIT 8–2
TEXAS EDUCATION AGENCY-SUGGESTED ITEMS FOR PURCHASING MANUAL COMPARED TO LAMESA ISD DOCUMENTS

FASRG RECOMMENDED ITEMS	LAMESA ISD BUSINESS PROCEDURES MANUAL
Purchasing goals and objectives	not addressed
Statutes, regulations, and board policies	limited
Purchasing authority	limited
Requisition and purchase order processing	present – also addressed in the LISD Inservice Training for Secretaries
Competitive procurement requirements and procedures	not addressed
Vendor selection and relations	limited
Receiving	present
Distribution	not addressed
Disposal of obsolete and surplus property	not addressed
Request for payment vouchers	not addressed
Repair and service of equipment	not addressed
FORMS	
Bid or proposal form	not addressed
Purchase order	present
Purchase requisition	present
Receiving report	limited
Vendor performance evaluation form	not addressed
Request for payment voucher	not addressed

SOURCE: Texas Education Agency, Financial Accountability System Resource Guide (FASRG), assessment by Review Team.

including relevant forms. The district can accomplish this by expanding the Business Procedures Manual to ensure that it provides comprehensive treatment of the purchasing function.

This recommendation can be implemented with existing resources.

TEXTBOOK MANAGEMENT (REC. 43)

LISD does not have comprehensive policies and procedures for management of textbooks. The district's practice of limiting student's use of textbooks to classroom sets may not be supportive of student learning.

CLASSROOM SETS

Teachers in the district use classroom sets of books as a standard operating procedure. The district checks out individual books to individual students upon request. LISD's Student Handbook states, "Some textbooks are so expensive that we purchase classroom sets rather than a textbook for each student taking the course. You may request that your child be permitted to take home any textbook used by the student, and if a book is available, we will gladly honor that request. If the teacher requests it, the student must return the textbook to school the following school day."

A district's decision to not issue textbooks to each student can affect both the district's policy and standard operating procedures regarding guided and independent practice, which are generally regarded as essential elements of the lesson cycle. If students need their textbooks in order to complete independent practice activities, then they are limited to doing these while they are in class, during the school day. This may decrease time for active teaching and learning, including guided practice, in class. It also may decrease both the breadth and depth of teaching and learning the Texas Essential Knowledge and Skills (TEKS), effectively ensuring that students do not have an opportunity to learn all of the TEKS. Students with special needs, such as English language learners and students with learning disabilities, often need more time to complete independent practice activities, and having textbooks readily available at home with illustrations, charts, graphs, tables, and other graphic aids can be especially valuable to these students. As part of its development of comprehensive textbook policies and procedures, the district should review the practice of using classroom sets to determine if it is supportive of student learning.

TEXTBOOK INVENTORY

Districts have a responsibility to accurately account for textbooks and instructional materials. After a new adoption, the district submits an order. The district receives new materials at the maintenance facility that serves as a limited warehouse, where the materials are stamped. The district does not number, place a barcode, or otherwise identify individual books. The warehouse then delivers the materials to the campus serving the grade level(s) intended for the materials.

At the campuses, assistant principals serve as textbook custodians. They conduct an annual inventory; however, they do not share results of the inventory with Central Office, as Board Policy CMD (LEGAL) requires: "The results of the inventory shall be recorded in a District's files." Instead, they note discrepancies on the campus inventory records.

Because the district does not barcode, number, or otherwise mark individual books, district employees cannot account for those checked out to students. Campuses keep the records of payments parents make for lost or damaged textbooks that teachers have checked out to students. However, central administration does not review these records, and the campuses have no written guidelines regarding the amount of fines for lost and damaged books that teachers have checked out.

The district does not have procedures to guide teachers in issuing and retrieving books checked out to individual students. As a result of the district's current textbook procedures, no one outside of each campus knows what the actual inventory is for each adoption. Because most teachers use classroom sets, there is an ample supply of books to replace those that students lose or damage, and there is little incentive to charge for lost or damaged items. The district should monitor textbook inventory records and receipts for lost or damaged items at each campus. The district might consider charging the difference between the value of what is lost and damaged and what is actually received to campuses' local budgets. This would provide an incentive for campuses to more actively collect payments. If the review establishes that the annual loss is more than what the assistant superintendents perceive, then the district should consider a mid-year or more frequent inventory to better locate missing or damaged books and improve the timeliness of notifications to parents. Over time, this should reduce losses.

FEES FOR LOST OR DAMAGED BOOKS

It is not clear who in the district is responsible for the process to charge students' parents or guardians for lost or damaged books. Both the assistant superintendent of Finance and Operations and the assistant superintendent of Personnel reported that very few students lose or damage books. However, the district does not collect and evaluate the annual inventory prepared at each campus to substantiate this perception.

The Employee Handbook states that students who did not return books the previous year will use textbooks in class but cannot take them out of class. This is a consequence not provided for in law or policy. The Board of Trustees has not provided circumstances where the district may waive or reduce payments for economically disadvantaged families. Given the relatively high percentage of economically disadvantaged students in the district, this is something the Board of Trustees and administration should consider.

TEXTBOOK ADOPTION PROCESS

LISD lacks written procedures, beyond those in local board policy, to guide the textbook adoption process or to select additional resources, outside of the process. Local policy EFA specifies objectives and criteria for instructional resources, but the district does not have a procedure to ensure that staff meet these objectives and follow the criteria. Local policy EFAA specifies that the superintendent or designee chair textbook selection committees and that a quorum of a committee must be present when the committee selects. However, it does not provide guidance regarding how many members each committee will have, how the district selects members, what criteria committees should use to make their selections, or whether the committees select by simple majority vote or some other process.

The Texas Education Code directs the State Board of Education to adopt two lists of textbooks, conforming and nonconforming. The nonconforming materials must address at least half of the applicable TEKS. LISD does not have procedures to provide guidance to committees regarding nonconforming materials or evaluating the quality of coverage of the TEKS in conforming materials.

The district does not have procedures regarding training or preparation of textbook adoption committees. This should include ethical requirements for the textbook adoption process. Board Policies DBD (LEGAL) and EFAA (LEGAL) describe these. Without guidelines, the district does not know how or if committees learn of these requirements. The district also does not have procedures to ensure that, as Board Policy EFAA (LOCAL) states, "Course materials relating to human sexuality, sexually transmitted diseases, or human immunodeficiency virus (HIV) or acquired immune deficiency syndrome (AIDS) shall be selected by the Board of Trustees with the advice of the local school health advisory council."

Dallas ISD has developed an Operational Manual for the textbook adoption process that is available on the district's website. The manual is specific to the current school year and provides information about both law and district policy in regard to the adoption process. It provides detailed guidance regarding campus textbook adoption committees, the documents they use in the process, and expectations for ethical behavior on the part of both the district and publishers. The manual also ensures that adoption committees consider the needs of students participating in special programs, such as special education and bilingual/English as a second language, when reviewing the materials. While smaller districts may not need a separate adoption process manual, they are responsible for the same adoption process and are governed by the same laws and policies. School districts benefit from written guidelines in this area, and districts may include them in their textbook manuals for ease of access.

OUT-OF-ADOPTION TEXTBOOKS

Finally, the district does not have procedures regarding out-of-adoption textbooks and other out-of-date materials. According to the Texas Administrative Code (TAC), districts may retain or donate out-of-adoption textbooks. Because of declining enrollment, campuses in the district generally have plenty of room to retain out-of-adoption and other out-of-date materials. As state curriculum frameworks change, districts must evaluate whether they want out-of-adoption textbooks that are not aligned with current frameworks available to staff and students. If districts do not want these materials, the TAC directs districts to make them available to students, adult education programs, state agencies, or nonprofit organizations. If no organizations want the items, districts may recycle them. LISD should consider what guidance it wants to give to the campuses regarding out-of-adoption textbooks and initiate the actions needed to retain, donate, or recycle them.

STAFF ASSIGNMENTS, TRAINING AND IMPLEMENTATION

The assistant superintendent of Personnel is responsible for the textbook function. This position also supervises

principals. This position is responsible for ordering textbooks from the state via the Educational Materials Management System (EMAT).

The LISD assistant superintendent of Personnel should retain responsibility for textbook operations and should work with Central Office and campus administrators to develop comprehensive administrative procedures for textbook management that address textbook selection, orders, distribution, inventory, and management. The procedures should detail the responsibilities of district staff and students and their parents/guardians, and should also provide guidance on disposal of out of adoption materials. The district should develop written procedures for the textbook adoption process and make these available on the district's website. The superintendent should review and approve all administrative procedures. The district should train all appropriate staff in the procedures and make appropriate reference to them in other district documents, such as employee handbooks, job descriptions, and employee evaluations. The assistant superintendent of Personnel should monitor textbook operations to ensure that district staff members follow the procedures. The district should annually review the textbook procedures and related documents, with the input of campus staff, and make changes as needed.

Round Rock ISD has developed a Textbook Coordinators Manual, which it makes available on the district's website. The manual provides an overview of law and policy and details responsibilities of various positions related to textbooks. It also details the procedures to be used to account for and dispose of textbooks. In addition, it provides campuses with guidelines and information about securing resources for students with special needs, such as highlighting of textbooks, recorded books, and books on CD.

LISD should develop comprehensive textbook management policies and procedures. These policies and procedures should include: (1) a review of the district's policy regarding the use of classroom sets; (2) procedures for an annual textbook inventory; (3) fees, and fee waivers, for lost or damaged books; (4) a textbook adoption process; and (5) procedures for out-of-adoption textbooks.

This recommendation can be implemented with existing resources.

CONTRACTED SERVICES MANAGEMENT (REC. 44)

LISD does not have a documented process for management of contracted services. There are no written policies and procedures and no provision for centralized monitoring of either contracts or vendor performance. Because of its size, the district does not have an employee assigned solely to manage purchasing. Therefore, no one is responsible for monitoring contracts or vendor performance. Without monitoring, the district cannot be assured that contracts and vendor performance are being monitored in a consistent and timely manner. This situation puts the district at risk of entering into contracts that are not favorable to district interests. The district may not receive appropriate services to meet its unique needs, it may pay more than it should for services, and it may continue to function with contracts that have expired. A district should have consistent record keeping procedures which guarantee that vendors are evaluated. These help to ensure that the district can support decisions to renew or extend contracts. Recordkeeping procedures also help to ensure that employee turnover or emergencies do not adversely affect the district's ability to manage contracts.

The LISD assistant superintendent of Finance and Operations has prepared the most recent requests for proposal documents in areas of his responsibility, including bank depository and audit services. For areas outside of his direct responsibility, program managers, not formally trained in procurement and having no written procedures to guide them, look for potential service providers to meet an identified need. They may or may not involve potential users in evaluating potential providers. They may or may not negotiate specific contract provisions that meet unique district needs. Program managers also do not conduct a formal vendor evaluation, after a contract has been awarded and is in effect. Problems with contractors appear to be handled on a case-by-case basis, and there is no formal process to document problems. As a result, the district is not able to ensure that contractors are providing all of the services promised on a timely and efficient basis. It is thus difficult for the district to enforce contract terms and conditions.

LISD does not have standard methods to guide managers in creating and keeping contract files up to date. It does not have a procedure that establishes where the original contracts are kept and who has access to them. The review team noted that the district could not provide a comprehensive list of contracted services, nor could it provide current and complete files for the team to review. During interviews, program managers referred to contracts that were not included in the list or in files initially provided by the district. Without a master list of contracts, the district cannot assure itself that someone in the district is monitoring and evaluating all

contracts. The district risks renewing contracts from year to year without receiving adequate, or any, benefit. The review team noted that one contract, for E-rate consulting services, appeared to have provided little or no benefit to the district; yet the district continued to renew the contract beyond the initial year. In addition, the district does not routinely secure review of proposed contracts from its legal counsel. This puts the district at risk of agreeing to terms that are not in its best interest or legally unallowable.

LISD does not have a formal process to monitor vendor performance and conduct vendor evaluation. Section 3.2.2.5 of the FASRG explains the importance of these processes: "A system for the evaluation of vendors and their performance is important to support an effective purchasing function." **Exhibit 8–3** compares LISD and its peer districts in the total value of contracted services for the past five years. During this same five-year period, the percent changes in total contracted services for the Region 17 school districts and all districts in the state were 16 and 28 percent respectively. Thus, there is an overall trend of districts spending more in contracted services. While the LISD totals during the five-year period are less than most of the peer districts, they are still substantial and illustrate the need for the district to monitor these services.

The review team noted that program managers did not appear to monitor vendor performance during or after the term of some contracts, including those for E-rate services and the curriculum management tool. The FASRG provides guidance in monitoring vendor performance during the term of the contract. It suggests the following:

- Document the problem in writing noting the date and an accurate description of the problem.
- Contact the vendor and communicate how the district wants the problem resolved.
- Keep a record of all contacts, including telephone calls.
- If the problem persists, contact the vendor in writing, restating the problem and solution desired and informing the vendor that failure to adequately respond will be considered a breach of the contract and may lead to cancellation.
- Consult with legal counsel if the problem is not solved.

The FASRG further recommends keeping an open and professional, yet independent and objective, relationship with vendors.

The FASRG also recommends that districts evaluate all vendor services to ensure that vendors meet the terms and conditions in the contracts. It suggests that districts consider the following during a contract term and especially when closing out a contract:

- timeliness of deliveries;
- service availability;
- completeness and accuracy of order; and
- quality of products or services received.

Figure 8–4 provides an overview of the elements that should be included in a school district manual that addresses both purchasing and contracting.

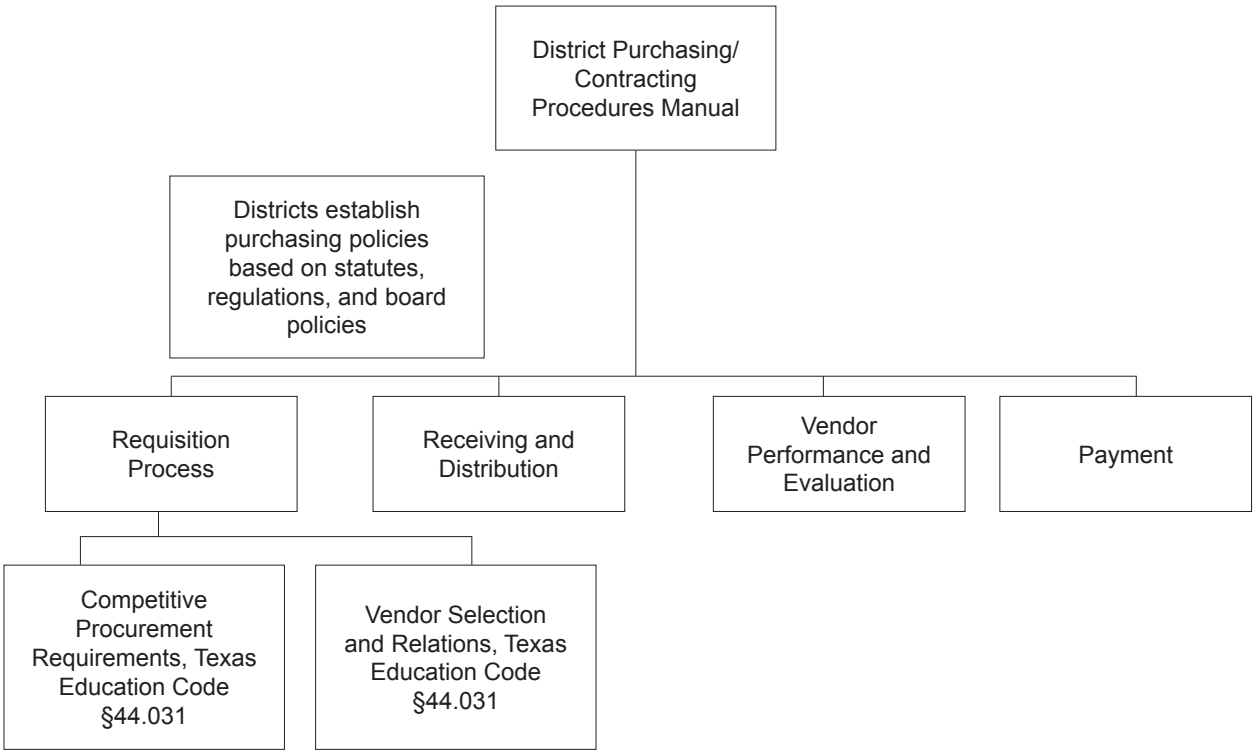
LISD should develop administrative procedures for management of contracted services. These procedures should provide comprehensive treatment of contract management, including evaluation of vendor performance, and provide

EXHIBIT 8–3
LAMESA ISD AND PEER DISTRICTS
ACTUAL EXPENDITURES PROFESSIONAL AND CONTRACTED SERVICES
SCHOOL YEARS 2004–05 TO 2008–09

DISTRICT	2004–05	2005–06	2006–07	2007–08	2008–09	PERCENT CHANGE
Lamesa ISD	**$1,669,686**	**$1,782,856**	**$1,664,585**	**$1,828,850**	**$1,567,284**	**-6%**
Seminole ISD	$2,017,282	$2,125,854	$2,501,343	$2,214,906	$2,851,373	41%
Venus ISD	$1,441,418	$1,411,267	$1,628,634	$1,663,704	$1,897,701	32%
Connally ISD	$3,083,683	$3,056,615	$3,383,896	$2,846,156	$2,414,863	-22%
Center ISD	$1,377,271	$1,578,266	$1,699,561	$2,013,530	$1,902,336	38%

SOURCE: Texas Education Agency, Public Education Information Management System (PEIMS), School Years 2004–05 to 2008–09.

EXHIBIT 8–4
RECOMMENDED SCHOOL DISTRICT PURCHASING PROCESS



SOURCE: Texas State Government Effectiveness and Efficiency Report, Legislative Budget Board Staff, January 2009.

relevant forms, such as a vendor evaluation form, where applicable. The district should make these resources available on the district's website and train principals and program managers on how to organize and manage contract files and evaluate contractor performance.

LISD should centralize contract files in the office of the assistant superintendent of Finance and Operations. Many districts maintain a cover sheet for each contract file that documents essential information for district staff and serves to inform new staff when there is turnover. A cover sheet often describes the problem or need that the contract addresses and the process used to select the contractor, such as competitive bidding or requests for quotes. The cover sheet also often provides the initial funding source, the length of the contract, contact information for both the district and the contractor, major terms and conditions or a reference to these in the contract itself, and any other information that will assist the district in monitoring, evaluating, and negotiating changes to the contract, if needed. To accomplish the latter, the cover sheet names the position responsible for evaluating vendor performance and anticipates when that person will conduct formative and summative checks. Program managers responsible for working directly with vendors should have copies of these cover sheets and contracts in their files In the future, should the district implement an internal website, the district should consider scanning the original contracts and cover sheets and making them available electronically.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 8: PURCHASING AND TEXTBOOKS							
42. Continue to develop administrative procedures regarding purchasing, expanding them to ensure that they provide comprehensive treatment of the purchasing function, including relevant forms.	$0	$0	$0	$0	$0	$0	$0
43. Develop comprehensive textbook management policies and procedures.	$0	$0	$0	$0	$0	$0	$0
44. Develop administrative procedures for management of contracted services.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 8	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 9

CHILD NUTRITION SERVICES

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 9. CHILD NUTRITION SERVICES

The child nutrition services section of this review examines the ability of the Lamesa Independent School District (LISD) Food Service Department to meet the goal of providing wholesome, nutritious, appealing meals to students through its Child Nutrition Programs (CNP). Ideally, the department will be fiscally self-sustaining, while offering meals that meet all local, state, and federal requirements.

LISD participates in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) but does not participate in the Afterschool Snack Program or the Summer Feeding Program. The director of Food Service indicated that the Boys and Girls Club operates the Summer Feeding Program in the City of Lamesa; however, she stated the department would be interested in catering to the program should the need ever arise. The district also transports approximately 100 meals to the Head Start program daily.

With the exception of Lamesa Success Academy, four of LISD's main campuses have an onsite kitchen where food is prepared and served. Three of the schools are closed campuses, except for the high school which is open, meaning that students may leave the campus during lunch.

The district currently operates a universal breakfast program at both North and South elementary schools. Each child, regardless of household income, is provided a breakfast at no charge. The director recognizes the benefit of the universal breakfast to children and stated that she would like to see this program expanded to the middle and high schools.

For the past 28 years, LISD has contracted with the same food service management company (FSMC), ARAMARK Educational Services, LLC. to operate the CNPs in the district. There are two FSMC employees, the director of Food Service and an assistant. All other 20 Food Service Department staff members are employed by Lamesa ISD.

The CNPs are funded by federal reimbursement for free, reduced-price, and full-price meals; state matching funds; and local revenues from the sale of meals and a la carte foods. The child nutrition proposed operating budget for school year 2010–11 was $1,066,026. During October 2010, the average daily participation (ADP) or the average number of students eating in the school cafeterias in the NSLP out of 1,924 total students (as of the last published Academic Excellence Indicator System report of 2009–10) was 1,132 students, or 58.8 percent, and the ADP in the SBP was 1,063 students, or 55.2 percent. These numbers are low especially in the SBP since two out of the four schools serve a free breakfast to all students under the universal breakfast program.

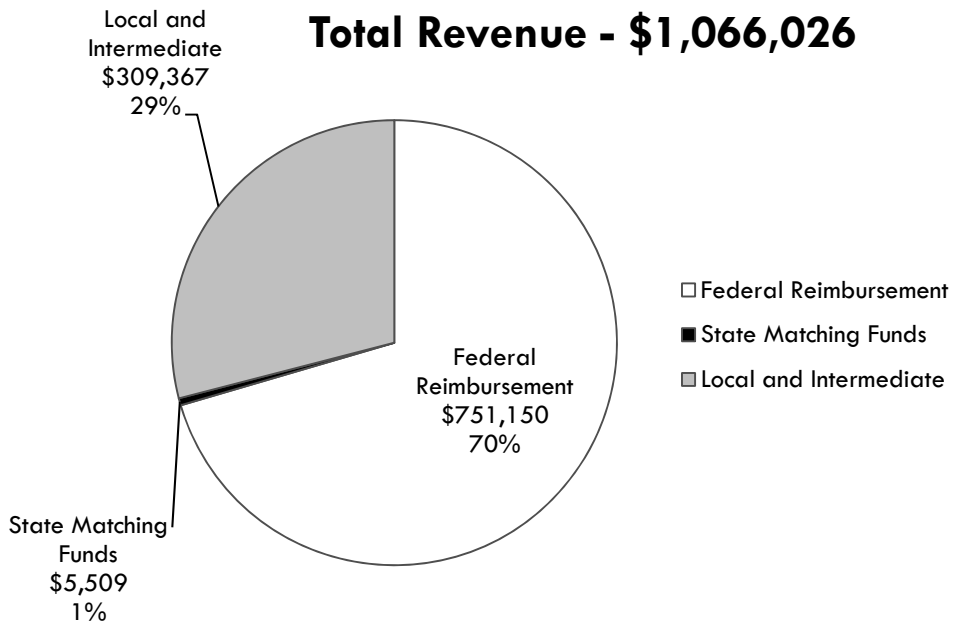
The information in **Exhibit 9–1** represents the revenue generated by the district's participation in the NSLP and the SBP, including all cash sales, federal reimbursement and other funding, and state matching funds. **Exhibit 9–2** notes the district's proposed budget for the 2010–11 expenditures by category.

It is important to note that circumstances specific to individual districts and schools contribute to food, labor, and non-food costs. Adjusting for district- or school-specific factors that will impact costs as a percentage of revenue, the following method is one commonly used in the school food service industry in developing budgets. This information is adapted from a chapter on financial management included in *Managing Child Nutrition Programs, Leadership for Excellence* (2008).

The method for determining the proposed budget for food, labor, and non-food expenditures is to calculate these costs as a percentage of projected revenue. If the district plans to maintain a food cost including purchased and United States Department of Agriculture (USDA)-donated commodity foods, the percentage should be from 40 percent to 45 percent of revenue. If USDA-donated commodity foods are calculated separately, the director of Food Service may strive for a food cost percentage of 37 percent to 38 percent food cost. In **Exhibit 9–3**, the cost of food was calculated without USDA-donated commodity foods at 40 percent as this percentage is more in line with the food cost in many school districts in Texas.

Another industry guideline is that "approximately 40 percent of total revenue is spent on labor. This percentage is useful to school nutrition program directors as a benchmark for making comparisons. Comparisons can be made from school to school, within a district, from district to district, or within a state or region. Cost percentages higher than anticipated

EXHIBIT 9–1
LAMESA ISD TOTAL REVENUE BY SOURCE OF CHILD NUTRITION BUDGET (PROPOSED)
SCHOOL YEAR 2010–11



CASH SALES		
Student Breakfast Sales	$13,417	
Student Lunch Sales	$79,131	
Student a la Carte Sales	$171,423	
Adult Sales	$37,134	
Catering Sales	$8,262	
Total Cash Sales	**$309,367**	**$309,367**
STATE AND FEDERAL REIMBURSEMENT/FUNDING		
Lunch (National School Lunch Program)	$459,038	
Breakfast (School Breakfast Program)	$292,112	
State Matching Fund	$5,509	
Total Reimbursements	**$756,659**	**$756,659**
Total Revenues		**$1,066,026**

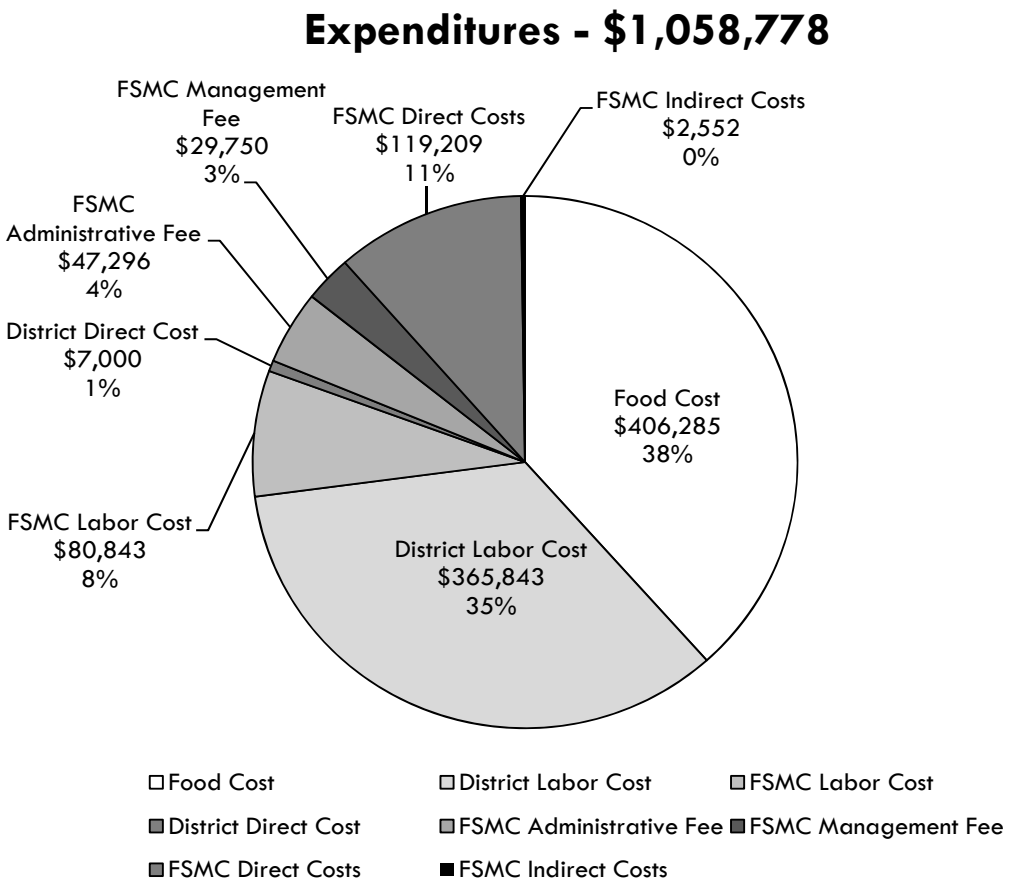
NOTE: Total revenues are the sum of all the cash sales and all the state and federal funding.
SOURCE: Exhibit C, Lamesa ISD Food Service Budget (Proposed); School Year 2010–11.

may be an indication that too many labor-hours are being allocated for the number of meals served."

It is important to note that these percentages are simply guidelines, and the district must use them as such, for example:

- Enrollment and ADP affect labor cost. A small school with low enrollment or low ADP may require a higher percentage of revenue for labor due to the lack of economy of scale.
- Whether the food is purchased-prepared such as frozen, fully cooked, entrees versus kitchen-prepared entrees will affect both food and labor costs.

EXHIBIT 9–2
LAMESA ISD TOTAL EXPENDITURES BY SOURCE OF CHILD NUTRITION BUDGET (PROPOSED)
SCHOOL YEAR 2010–11



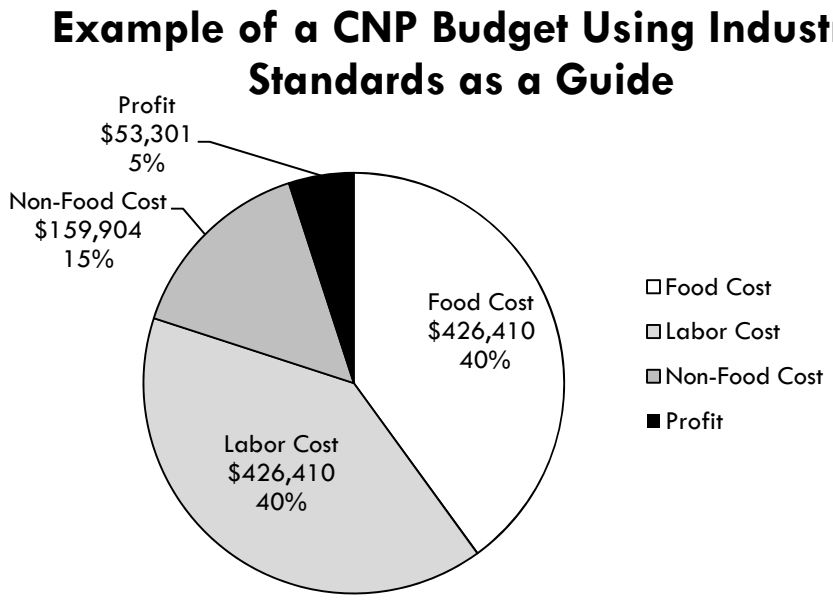
FSMC Fees		
Administrative Fee Costs (0.1116 per meal)	$47,296	
Management Fee Costs (0.0584 per meal)	$29,750	
Total FSMC Fees	**$77,046**	**$77,046**
Food Costs		
Gross Food Costs	$406,285	
USDA Donated Commodities Foods Used	$44,870	
USDA Donated Commodity Foods Processing	($44,870)	
Total Food Costs	**$406,285**	**$406,285**
FSMC Labor Costs		
FSMC Base Gross Salary	$45,924	
FSMC Bonus	$4,776	
FSMC Merit Increase	$1,837	
FSMC Fringe Benefits	$20,162	
FSMC Payroll Taxes	$8,144	
Total FSMC Labor Costs	**$80,843**	**$80,843**
(18 percent of Total Labor Cost for 2 FSMC employees)		

EXHIBIT 9–2 (CONTINUED)
LAMESA ISD TOTAL EXPENDITURES BY SOURCE OF CHILD NUTRITION BUDGET (PROPOSED)
SCHOOL YEAR 2010–11

District Hourly Staff Costs		
Gross Salaries	$248,370	
Fringe Benefits	$63,000	
Payroll Taxes	$5,253	
Worker's Compensation	$25,300	
Other (Teacher Retirement System)	$23,920	
Total District/FSMC Hourly Staff Costs	**$365,843**	**$365,843**
FSMC Direct Costs – Subcategory Examples		
Paper and Disposable Goods	$35,019	
Replacements/Small wares	$3,150	
Contracted Labor	$829	
Auto Expenses	$3,200	
Insurance Allocated Charge (Worker's Compensation Excluded)	$4,472	
Postage	$1,300	
Bank Deposit Services	$450	
Uniforms and Laundry	$1,200	
Other Delivery and Freight - Non-Food	$660	
Advertising, Promotions and Menus	$11,450	
Marketing and Decor	$5,000	
Technology Expense	$6,828	
Employee Travel	$875	
Miscellaneous – Specify rental	$3,500	
Employee Welfare	$1,000	
Delivery Charge Allocations and Charge outs	$40,000	
Waste Removal	$276	
Total FSMC Direct Costs – Subcategory Examples	$119,209	$119,209
District Direct Costs		
Other Contracted Services and Equipment	$6,000	
General Supplies	$1,000	
Total District Direct Costs	**$7,000**	**$7,000**
FSMC Indirect Costs – Subcategory Example		
Other Allocated Charges	$2,552	$2,552
Total Expenditures		**$1,058,778**
Surplus/Subsidy equals total revenues minus total expenditures.	$7,248	$7,248
Total Revenue from Exhibit 9-1		**$1,066,026**

SOURCE: Lamesa ISD Food Service Budget (Proposed), 2010–11.

EXHIBIT 9–3
EXAMPLE OF A CNP BUDGET USING INDUSTRY STANDARDS AS A GUIDE



SOURCE: Provided by Review Team using Lamesa ISD proposed revenue for 2010–11 and industry standards, March 2011.

- If the district uses service disposables instead of washing dishes, the labor and non-food expenditures may vary.

Exhibit 9–3 demonstrates how a CNP budget might be planned using the LISD proposed revenue from **Exhibit 9–1**.

FINDINGS

- LISD does not have a comprehensive oversight plan to remain directly involved in and closely monitor the child nutrition program operations to ensure that the district is in compliance with all state and federal regulations governing the programs; and that program funds are maximized to deliver the highest affordable quality of food and service to LISD students.
- LISD may be inconsistent with the requirements regarding the counting and claiming procedures as outlined in the district's policy statement on file with Texas Department of Agriculture (TDA).
- LISD does not conform to the counting and claiming procedures as outlined in the district's policy statement on file with TDA in their application agreement/ renewal form.
- LISD may not be conforming to Accuclaim On-Site Reviews for school year 2010–11.
- LISD did not conform to the district's policy statement, Attachment A, on file with TDA, which identifies a district employee, the middle school kitchen manager, as the reviewing official for free and reduced-price meal applications.
- LISD does not ensure that child nutrition staff are following standardized recipes and maintaining accurate food production records as documentation on the meals served and claimed.
- LISD does not have adequate nutrient analysis documentation to demonstrate that the district meals claimed for federal reimbursement during school year 2010–11 met the requirements of the Nutrient Standard Menu Planning (NSMP) approach.
- LISD lacks procedures to deal with expired food products.
- LISD's charge policy when students do not have money for meals has not been upgraded to take into account federal reimbursement claim guidelines.
- LISD has not implemented Offer versus Serve at the South Elementary School.

- LISD is not controlling the amount of food produced in individual kitchens; the elementary kitchens are over producing, which contributes negatively to the CNP fund balance.
- LISD does not monitor tray waste in the cafeterias or take an active role in determining the types of products that are purchased and served.
- LISD has not researched the prices paid for food including rebates and credits as compared to those paid by other districts in the surrounding area.
- The student and adult full-price breakfast and lunch prices do not cover the cost of producing and serving the meals.
- LISD has not evaluated methods to increase participation in the School Breakfast Program (SBP) or National School Lunch Program (NSLP).

RECOMMENDATIONS

- **Recommendation 45: Cooperate with the Texas Department of Agriculture (TDA) regarding the recommendation of the Legislative Budget Board that TDA conduct an investigation of Lamesa ISD's child nutrition program under provisions of the US Code of Federal Regulations (CFR) Title 7 CFR 210.19(A)(1)(c)(vii)(5) regarding investigations which cites; "Each State agency shall promptly investigate complaints received or irregularities noted in connection with the operation of the Program, and shall take appropriate action to correct any irregularities." The TDA investigation should review the actions and environment leading to the program discrepancies in the Lamesa ISD Child Nutrition program.**
- **Recommendation 46: Review procedures for claiming federal reimbursements for elementary breakfasts.**
- **Recommendation 47: Establish an accurate Point Of Service (POS) count of the breakfasts served and claimed for reimbursement.**
- **Recommendation 48: Meet Accuclaim onsite review deadlines.**
- **Recommendation 49: Ensure that a district employee reviews and signs all applications for free and reduced-price meals to conform to the district's policy statement with TDA.**
- **Recommendation 50: Ensure that food service staff are following standardized recipes and maintaining accurate food production records.**
- **Recommendation 51: Monitor the system used for analyzing the nutrients in menus planned to meet the federal requirements for reimbursable meals served under the NSMP.**
- **Recommendation 52: Develop a process to monitor expiration dates of foods purchased and served in the child nutrition program.**
- **Recommendation 53: Establish a charge policy using a system that accommodates the concerns of principals, teachers, and parents.**
- **Recommendation 54: Implement Offer versus Serve at all schools, in all grade levels and conduct periodic waste studies.**
- **Recommendation 55: Ensure that schools produce servings based on prior food production records.**
- **Recommendation 56: Monitor tray waste and participate in food tasting events to determine district food purchase preferences.**
- **Recommendation 57: Compare the food prices paid through the FSMC, to the prices paid by the members of the Regional Education Service Center XVII food service cooperative and other surrounding districts and consolidate and reconcile distributor invoices to validate direct food costs prior to paying FSMC monthly invoice.**
- **Recommendation 58: Consider raising adult and student full-price breakfast and lunch prices to ensure that the revenue generated is sufficient to cover the cost of preparing and serving the meals.**
- **Recommendation 59: Conduct a cost benefit analysis regarding the impact of serving a universal breakfast at the secondary schools and closing the high school campus for lunch so more students participate in school lunches.**

DETAILED FINDINGS

PROGRAM OVERSIGHT (REC. 45)

LISD does not have a comprehensive oversight plan to remain directly involved in and closely monitor the child nutrition program operations to ensure that the district is in compliance with all state and federal regulations governing the programs; and that program funds are maximized to deliver the highest affordable quality of food and service to LISD students. During onsite review of the district's child nutrition programs, it was noted that the district places significant reliance on the FSMC to oversee all aspects of the food service program. In an interview with district officials, it was stated that the district contracts with an FSMC for their expertise in the operation of child nutrition programs, and that the district trusts that all required tasks are completed as necessary under the direction of the FSMC. Officials further indicated that they had no plan for district employees to perform tasks such as reviewing applications for free and reduced-price meals since they had a FSMC to take care of such program related duties. Consequently, the review team observed that the district's dependence on the FSMC may have led to disparities between regulatory requirements and district actions. Examples include:

- claiming federal reimbursement for breakfasts that do not meet meal pattern requirements as served in the classrooms at North and South Elementary Schools;
- failure to conform to the collection method outlined in the district's policy statement yielding an inaccurate count for claiming reimbursable breakfasts served in the North and South Elementary School classrooms;
- failure to complete the Accuclaim onsite review for school year 2010–11, as documented during the onsite review on February 25, 2011, which are required to be conducted prior to February 1 of each school year;
- failure of the designated district reviewing official to determine eligibility and sign applications for free and reduced-priced meals;
- failure to follow standardized recipes and maintain accurate food production records as documentation of the meals served and claimed;
- lacking adequate nutrient analysis documentation to demonstrate that the district meals claimed for federal reimbursement during school year 2010–11 met the requirements of the Nutrient Standard Menu Planning (NSMP) approach; and
- failure to remove a case of expired, unflavored skim milk dated February 18 which was found on the serving line of South Elementary School during the onsite review on February 24, 2011.

According to the United States Department of Agriculture (USDA), "under their agreements with a State Agency (SA), school food authorities (SFAs) are responsible for operating the school nutrition programs in schools under their jurisdiction. These programs include the National School Lunch Program (NSLP), the School Breakfast Program (SBP), and the Special Milk Program for Children (SMP). To assist in carrying out this responsibility, a SFA may contract with a food service management company (FSMC) to manage its food service operation involving these programs in one or more of their schools."

SAs are required to ensure that participating SFAs (districts) entering into contracts with FSMCs comply with state and federal cost and procurement standards and applicable federal regulations.

If a district contracts with an FSMC, the district remains responsible for the overall operation of the child nutrition program. Federal guidelines for a district that contracts with an FSMC state that "… a district retains and maintains direct involvement in the operation of the food service." In addition, the guidelines also suggest that a district contracting with an FSMC should have a sufficient number of knowledgeable staff to coordinate, monitor, review, and control food service operations and to perform the responsibilities that must be retained by the district.

Moreover, a district that uses an FSMC must also contract with their state agency (SA), in the case of Lamesa ISD, the Texas Department of Agriculture (TDA). TDA, in turn, has a contract with the USDA. It is the district—not the FSMC-that is responsible for the following:

- ensuring that the terms of that contract are met and that the district is in compliance with all state and federal regulations governing the operations of the CNP;
- retaining signature authority on the state agency-school food authority agreement, free and reduced-price policy statements and claims;
- ensuring that contract language confirms the SFA's responsibility for monitoring the food service

operation through periodic onsite visits to ensure the food service is in conformance with federal program regulations set forth in the NSLP regulations at 7 CFR 210.19; and

- ensuring the FSMC maintains records needed by the district in submitting its claim for reimbursement and is reporting that information promptly to the district at least monthly.

For the past 28 years, Lamesa ISD has contracted with ARAMARK Educational Services LLC, an FSMC, to operate its child nutrition program. The district's current contract is from July 2010 through June 2011. The annual contract may be renewed for four additional terms of one year each upon mutual agreement between the district and the FSMC. In interviews with district officials, they stated the district has only received one FSMC proposal each time it has submitted a bid.

A contract between the district and the FSMC must be submitted unsigned by the SFA to TDA by April 30 of each year. TDA may make recommendations or direct changes to the terms listed on the document. If changes are made by the district, the contract must be resubmitted to TDA for re-evaluation and final approval. Once the contract is approved and signed by the district and FSMC, it is due to TDA no later than July 1, when TDA approves the document. TDA will not release funds to the district to pay for its FSMC contract if the document is altered without TDA approval. **Exhibit 9–4** presents the district's contract terms with the FSMC.

LISD's child nutrition program is supervised by the assistant superintendent of Finance and Operations. All food service employees at the four district schools each report to a school kitchen manager who then reports to the director of Food Service and ultimately to the assistant superintendent of Finance and Operations.

The assistant superintendent of Finance and Operations and the director of Food Service work closely on personnel matters relating to the district food service staff. According to the contract, the district "retains the exclusive right to control the terms and conditions of the employment of such supervisory and non-supervisory employees, including, but not limited to, control over their hiring, firing, promotion, discipline, levels of compensation and work duties."

The district is also responsible for having its own official review, and analyzing and signing the claim for reimbursement. In the event that there is a failure to submit accurate claims, it may result in the recovery of an over-claim and potentially result in the withholding of payments, suspension, or terminations of the district's program participation.

Finally, while districts may contract with an FSMC to manage the school food service operations, they may not delegate certain duties to the FSMC. Districts, not FSMCs, are responsible for the following:

- observing the limitations on the use of the district's nonprofit food service revenue account. This includes using the CNP account funds to pay only allowable costs billed by the FSMC;
- determining the eligibility of children for free and reduced-price meals;
- ensuring that only reimbursable meals are included on the claim for reimbursement, regardless of the total number of meals billed for by the FSMC;
- retaining financial responsibility for payment of the storage and distribution of United States Department of Agriculture (USDA)-donated commodities;
- ensuring income and expenses do not accrue to the FSMC; and
- monitoring the FSMC's food service operation through periodic onsite visits.

Districts with more than one school must conduct an annual onsite review of each school prior to February 1 of each school year to observe the school's counting and claiming procedures. If the review identifies a problem with a school's meal counting or claiming procedures, the district must do the following:

- ensure the school implements corrective action; and
- conduct follow-up onsite reviews within 45 days of the review to determine if the corrective action resolved the problem(s).

EXHIBIT 9–4
LAMESA ISD CONTRACT TERMS WITH FOOD SERVICE MANAGEMENT COMPANY
SCHOOL YEAR 2010–11

TYPE OF CONTRACT
Cost Reimbursable Option - • The Food Service Management Company (FSMC) charges a fee for general and administrative expenses ($0.1116 meal/meal equivalent) and management of food service operations ($0.0584 meal/meal equivalent). Total FSMC fee for meal/meal equivalent is $0.17. • Meal equivalency rate, 2.90 (the equivalency factor for the Meal Equivalent shall remain fixed for the term of the contract and all renewals.)
SERVICES PROVIDED BY FSMC
• National School Lunch Program – all campuses • School Breakfast Program – all campuses; breakfast in classroom at South and North Elementary Schools • Fresh Fruit and Vegetable Program – all campuses • A la carte – all campuses • Adult Meals – all campuses • Catering – all campuses • Disaster Feeding (Middle and High Schools only) • Feed Head Start Program (as directed by SFA)
PROGRAM EXPENSES – DISTRICT RESPONSIBILITY
Food - food purchases, commodity processing charges, processing and payment of invoices *Labor* - FSMC and District Employees • FSMC Employees – salaries/wages, fringe benefits and insurance, retirement, payroll taxes, workers' compensation, unemployment compensation • District Employees - salaries/wages, fringe benefits and insurance, retirement, payroll taxes, workers' compensation, unemployment compensation • FSMC bills for direct and some indirect costs. *Other Expenses* - • paper disposable supplies, • cleaning/janitorial supplies, • china/silverware/glassware, • initial inventory, • telephone local and long distance calls, • trash removal from premises, • pest control, • equipment replacement for nonexpendable and expendable, • car/truck rental, • vehicle maintenance, • storage costs for food/supplies, • tickets/ tokens, • office supplies, • printing, • promotional materials, • cellular phones, • mileage, • lodging, • cleaning of dining room floors, grease traps, tables and chairs, cafeteria walls, light fixtures, windows/window coverings, hoods, grease filters, duct work, and exhaust fans.

SOURCES: Lamesa ISD Request for Proposal and Contract, School Nutrition Programs Food Service Management Company 2010–11.

The USDA provides districts with specific guidelines related to monitoring and recordkeeping responsibilities if the district contracts with an FSMC. **Exhibit 9–5** summarizes the district's responsibilities regarding monitoring the FSMC and its child nutrition program.

If the district does not closely plan for and monitor services being provided through its child nutrition programs, it risks not only the potential for being out of compliance with federal and state regulations and the potential to be sanctioned, but more importantly, it may be doing a disservice to program participants in not providing the best affordable services.

The district should cooperate with the Texas Department of Agriculture (TDA) regarding the recommendation of the

EXHIBIT 9–5
DISTRICT MONITORING RESPONSIBILITIES FOR CONTRACTED CHILD NUTRITION PROGRAMS

DISTRICT RESPONSIBILITIES
• Monitor the operation of the FSMC through periodic onsite visits to ensure that the FSMC complies with the contract and any other Federal, State and local rules and regulations.
• Maintain documentation of district monitoring activities, any corrective action required, and whether or not corrective action was taken.
• Monitoring activities include evaluating: • Cycle menu; • Meal pattern; • Claim documentation; • Cost records; • Meal count records; • Revenue records; • Outside activities; • Preparation facilities; and • USDA donated foods.
• Conduct onsite school review and monitor the following elements of the child nutrition program through these reviews: • Compliance with civil rights requirements; • Adherence to the district's approved free and reduced price meal policy statement; • Compliance with offer versus serve requirements, compliance with competitive food requirements of the NSLP regulations in all schools by all parties; and • Compliance with all policies established by the district.
• Ensure the resolution of Program reviews and audit findings.

SOURCE: United States Department of Agriculture (USDA), Contracting with Food Service Management Companies – Guidance for School Food Authorities, June 1995.

Legislative Budget Board that TDA conduct an investigation of Lamesa ISD's child nutrition program under provisions of the US Code of Federal Regulations (CFR) Title 7 CFR 210.19(A)(1)(c)(vii)(5) regarding investigations which cites; "Each State agency shall promptly investigate complaints received or irregularities noted in connection with the operation of the Program, and shall take appropriate action to correct any irregularities." The TDA investigation should review the actions and environment leading to the program discrepancies in the Lamesa ISD Child Nutrition program.

In addition, the district should develop a comprehensive oversight plan to ensure that the district is in compliance with all state and federal regulations governing the programs; and that program funds are maximized to deliver the highest affordable quality of food and service to the students of LISD. The following may be part of the plan:

- Analyze and validate all proposed expenditures prior to awarding or renewing the FSMC contract. Each expenditure should be determined to be necessary in contributing to the quality of the programs as defined by the district at the end of each school year. The current year's expenditures should be compared to the contract's proposed expenditures for the purpose of evaluating the proposal for the following year.
- Create a checklist with a timeline indicating tasks to be accomplished in an effort to monitor and guide the activities of the FSMC and district food service employees to ensure compliance with program regulations and the delivery of quality food and service to the students of LISD. Suggested activities may include:
  - ensuring district cafeteria managers receive written procedures for following standardized recipes and maintaining accurate food production records to support the district's claim for reimbursable meals; training from the FSMC; and monitoring for compliance with those procedures by a district reviewer;
  - ensuring teachers participating in the universal breakfast program receive written procedures and training in understanding the counting and claiming of reimbursable meals;
  - guaranteeing the LISD staff member designated to oversee and sign applications does so;
  - ensuring that Accuclaim onsite reviews are conducted per the district's agreement with TDA; and
  - conducting random and routine onsite visits to cafeterias during meal service to monitor tray waste, discuss any findings with students, cafeteria aides, staff, and managers, work with the director of Food Service to make necessary changes. TDA has outlined a Self-Assessment Tool beginning on page 23.15 of the Administrator's Reference Manual (ARM) which may be found at: http://www.squaremeals.org. This document may provide suggestions for activities to be included in the monitoring activities.

The district indicated to the review team after onsite work was conducted, that they are "always willing to cooperate with TDA with regards to the Child Nutrition Program."

This recommendation can be implemented with existing resources.

PROCEDURES FOR CLAIMING REIMBURSABLE BREAKFASTS (REC. 46)

LISD may be inconsistent with the requirements regarding the counting and claiming procedures as outlined in the district's policy statement on file with TDA. The district is claiming federal reimbursement for breakfasts that do not meet meal pattern requirements as served in the classrooms at North and South Elementary Schools. During the onsite visits to North and South Elementary Schools, the review team observed breakfast service in several classrooms. On February 24, 2011, the menu at South Elementary School offered milk and three side items; Razzberry Dazzle (a cookie-like whole-grain product), string cheese, and Cheerios Bowl pack. The district's interpretation of Offer versus Serve (an approach that allows students to decline some of the food offered) regulations was that the child must select two or more items in order to claim reimbursement for the meal. However, federal regulations require that the child must be offered milk and two or more side items under the Nutrient Standard Menu Planning (NSMP), and the child may only refuse one item. In order for the meal to be reimbursable, the student should have selected any three of the four offered items. Three of the offered choices were a lot for the child to select and eat, although a few did.

The information in **Exhibit 9–6** reflects observations of student selections of at least two items in three classrooms at South Elementary. Under strict interpretation of the Offer versus Serve regulations, a far greater number of the meals observed would not have been reimbursable.

It is presumed that the reason for offering three entrée-type side items was to provide sufficient calories and other nutrients in the meal. If the nutrient analysis will allow, one of the entrée-type side items could be eliminated and fruit or juice be substituted. With this option, more of the students may select a third side. The district should use care in determining the number of side dishes they offer at breakfast given that only one item can be refused in order for the meal to be claimed. Of the 33 breakfasts observed and claimed, seven, or 21 percent did not contain two items. Far more did not contain three items. Thus, these meals did not meet requirements or qualify for reimbursement.

Over a period of 20 days during the month of October 2010, South Elementary School served and claimed 7,830 breakfasts; and North Elementary served and claimed 7,784 breakfasts. **Exhibit 9-6** demonstrates the annual overclaim if 21 percent is the typical percentage of non-reimbursable meals.

The district could be over-claiming an estimated $42,647.40 of reimbursement per year for the universal breakfast program at North and South Elementary Schools.

If the district does not train all individuals involved in the claim process to recognize a reimbursable meal, it will continue to claim unearned federal reimbursement.

EXHIBIT 9–6
LAMESA ISD DAILY/ANNUAL OVERCLAIM PROJECTIONS ON BREAKFASTS SERVED IN ELEMENTARY CLASSROOMS BASED ON OBSERVATION OF 21 PERCENT NON-REIMBURSEABLE MEALS

CATEGORY	REIMBURSEMENT RATE	DAILY ADP	21 PERCENT NON-REIMBURSABLE	DAILY OVERCLAIM	ANNUAL OVERCLAIM
North Elementary					
Free	$1.76	283	59	$104.58	$18,824.40
Reduced-Price	$1.46	22	5	$6.65	$1,197.00
Full-Price	$0.26	85	18	$4.62	$831.60
South Elementary					
Free	$1.76	304	64	$112.40	$20,232.00
Reduced-Price	$1.46	16	3	$4.75	$855.00
Full-Price	$0.26	72	15	$3.93	$707.40
				$121.08	$21,794.40
Total Projected Overclaim at North and South Elementary Schools				**$236.93**	**$42,647.40**

SOURCE: Developed by Review Team based on observations of breakfasts served and counted as reimbursable at North Elementary School on February 23, 2011, and at South Elementary on February 24, 2011.

The district should review procedures for claiming federal reimbursement for elementary breakfasts. The district should also conduct an internal review of the operations of the classroom breakfast service using the requirement that the student may only refuse one of the offered menu items. Using the same methodology as was used to develop **Exhibit 9–6**, the district can determine an estimate of the federal reimbursement that is being over-claimed annually. The district must train all teachers who are counting reimbursable breakfasts served in their classrooms to recognize a reimbursable breakfast (i.e., the child has refused no more than one of the offered components of the breakfast) prior to recording the breakfast as part of the meal count. Middle and high school breakfast serving lines should also be reviewed to ensure that only one menu item is refused if the meal is being claimed for reimbursement.

Using 21 percent as the number of students who are not selecting a reimbursable breakfast in the classroom, the district could be over-claiming an estimated $42,647.40 per **Exhibit 9–4** calculations of reimbursement per year for the universal breakfast program at North and South Elementary Schools. Over claiming of meals by $42,647 (rounded) in 2010–11 may cost the district in the future as over claimed reimbursements need to be returned to TDA.

Since onsite work was conducted by the review team in February 2011, the district has begun efforts to correct the current system by removing the responsibility of counting meals by teachers and instead transferring that responsibility to a food service employee who will deliver breakfast to the classrooms on a cart. It is important to ensure that food service staff is also trained in the process of counting meals so they too may recognize a reimbursable breakfast prior to recording the breakfast as part of the meal count.

POINT-OF-SERVICE COUNTS OF MEALS SERVED AND CLAIMED (REC. 47)

LISD does not conform to the counting and claiming procedures as outlined in the district's policy statement on file with TDA in their application agreement/renewal form. The district does not have an accurate method for counting and claiming breakfasts served in the North and South Elementary School classrooms. Teachers at North and South Elementary Schools are counting breakfasts served in their classrooms but are not following an acceptable procedure that yields accurate Point-of-Service (POS) counts of reimbursable meals.

The current policy statement indicates that the meals are distributed by teachers to students in classrooms, and a count is taken by category on a roster after the meal is received. The roster is returned to the cafeteria and entered into the POS system. The system actually in use deviates from the system described in the policy statement in that teachers do not distribute the meals, instead, students select what they intend to eat; which may or may not be a reimbursable meal.

Meals are counted in a variety of ways such as:

- some teachers have the student call out whether or not they ate;
- some check everyone because "everyone eats"; and
- some allow the students to check themselves off a roster.

All are unacceptable methods for counting the meals served and claimed for federal reimbursement. During onsite visits to each of the elementary schools, no teacher observed had implemented the counting and claiming system properly.

The district should establish an accurate POS count of the breakfasts served and claimed for reimbursement. The district may use the POS count currently identified in the policy statement on file with TDA or may develop a new one and submit it to TDA for approval. When asked, teachers indicated that they were not aware of any written procedures that they have been directed to follow when counting meals and recording the counts.

If the district does not institute an accurate method for counting and claiming the meals served in classrooms at North and South Elementary Schools, it risks losing a substantial percentage of its annual federal reimbursement for breakfast. If this violation were discovered during the course of a Coordinated Review Effort (CRE) by a TDA compliance monitor, it may be written as a Critical Area Violation, and fiscal action may be required by USDA.

As noted in the previous finding, since onsite work in February 2011 by the review team, the district has indicated that "breakfast carts have been implemented in South Elementary and will be implemented in August for North Elementary. The purpose of the carts is to ensure that a food service employee correctly counts and claims each student as they select their breakfast items. This will also remove all of the responsibility from teachers and eliminate incorrect claiming and food not being returned to the cafeteria after service."

This recommendation can be implemented with existing resources.

ACCUCLAIM ONSITE REVIEWS (REC. 48)

LISD may not be conforming to Accuclaim onsite reviews for school year 2010–11. As of February 24, 2011, the district had not yet completed the Accuclaim onsite reviews which are required to be conducted by a district member, not the FSMC, prior to February 1st of each school year.

According to the Texas Department of Agriculture, October 2010, Counting and Claiming 7.16 Accuclaim regulations state, "An onsite review should ensure, at a minimum, the following:

- The counting system is consistent with the district's policy statement as approved by TDA;
- The counting system, as implemented, yields the actual number of reimbursable free, reduced-price, and paid lunches served for each day of operation;
- The counting system prevents over identification of students receiving free and reduced-price meals; and
- The system provides for adequate monitoring to ensure that only reimbursable meals are counted.

If the review discloses problems with the feeding site meal counting or claiming procedures, the district shall ensure that the feeding site develops and implements a corrective action plan. Further, the plan should be in writing and developed jointly by the CNP department manager (in LISD, the director of Food Service) and the district official who performed the review. The plan should detail the corrective action necessary to bring the feeding site into compliance and assign responsibility for implementing the plan. The district shall conduct a follow-up on-site review within 45 days to determine that the corrective action resolved the problems. Best practices dictate that the district remain in compliance with all USDA regulations in order to comply with the district's Application Agreement with TDA.

If the district does not conform to performing the Accuclaim onsite reviews of the counting and recording procedures by the February 1 annual deadline, during the course of the CRE, the district may be found to be in violation of the Accuclaim regulations.

LISD should meet Accuclaim onsite review deadlines. The problems found with the breakfast counting and recording procedures should be included in the onsite reviews. Each year the district should perform the Accuclaim onsite review of the counting and recording procedures in each school as soon as possible. The district should conform with the February 1 deadline in future years. This process cannot be delegated to a FSMC employee.

After onsite work, district officials noted to the review team that "Accuclaim onsite reviews will be completed by the deadline in the future."

This recommendation can be implemented with existing resources.

APPROVAL OF FREE AND REDUCED-PRICE MEAL APPLICATIONS (REC. 49)

LISD did not conform to the district's policy statement, Attachment A, on file with TDA, which identifies a district employee, the middle school kitchen manager, as the reviewing official for free and reduced-price meal applications. An FSMC employee, the director of Food Service, instead served as the reviewing official and signed all applications for free and reduced-price meals for school year 2010–11.

An FSMC employee may review free and reduced-price meal applications and make recommendations as to the level of benefits a family should receive, but the application must be reviewed and signed by the district employee designated as the reviewing official in the district's policy statement on file with TDA.

If a district employee does not review and sign the district's applications for free and reduced-price meals, the district remains in non-compliance.

The district should ensure that a district employee reviews and signs all applications for free and reduced-priced meals to conform to the district's policy statement with TDA.

District officials commented to the review team that the "district will review the current procedures for processing and approving free and reduced applications prior to the beginning of school in August 2011 to ensure that the approval process meets the requirements." This recommendation can be implemented with existing resources.

STANDARDIZED RECIPES AND FOOD PRODUCTION RECORDS (REC. 50)

LISD does not ensure that child nutrition staff are following standardized recipes and maintaining accurate food production records as documentation of the meals served and claimed. All meals claimed for reimbursement must be

supported by an accurate food production record and the district's assurance that standardized recipes are followed, without fail.

There are only two methods to monitor whether or not meals claimed for reimbursement meet requirements:

- Staff observes preparation on the day the meals are served; and
- Staff examines menus, nutrient analyses, and food production records for previously served meals.

School districts using a food-based system for planning menus (LISD uses a nutrient, not food-based system) must record the amount of food prepared on the food production record using purchase units (i.e., ground beef in pounds, purchased-prepared nuggets and patties in cases, canned fruits and vegetables in the number of No. 10 cans; and frozen fruits and vegetables in pounds). When the district uses a nutrient-based menu planning system as LISD does, TDA allows the amount prepared to be recorded as a number of times a particular recipe is used, (i.e., 3 x recipe #13). When using this method of recording the amount of food prepared, it becomes challenging to determine what foods were actually prepared unless one is onsite at the time of preparation. Food production records, and the nutrient analysis supported by them, become less worthy as documentation for the meals served and claimed when one or both of the two following actions occur:

- A cook does not follow the recipe; and
- A manager does not record the actual number of times the recipe that was prepared after the food production is completed.

When visiting the North Elementary School on February 23, 2011, both of the above described conditions were discovered. The district recipe for Sloppy Joes was not followed and did not yield the expected number of portions as identified on the food production record and in the nutrient analysis for the day. The cook used an insufficient amount of ground beef from what was stated in the recipe, and the director of Food Service had the amount prepared recorded on the food production the day before the preparation occurred.

In order for the NSMP system to work, all preparations must have a written, standardized recipe. The recipe must be strictly followed by the cook, and the manager cannot record how much was prepared prior to preparation. The system did not work at North Elementary on February 23, 2011, and the food production record did not accurately document the meals claimed and served.

The district does not monitor if the actual food production is accurately portrayed on the food production record. Under current circumstances, in order for a district employee to monitor the actual content of the meals claimed and served, the employee must be present onsite on the day of production. Although a multiple number of recipes (i.e., 3 x recipe) is sufficient documentation for TDA, it is only when the district can ensure that a recipe is followed for every preparation, and the actual food prepared is recorded accurately on the food production record that accurate monitoring can occur.

On March 7, 2006, the compliance monitor from TDA conducted a CRE of LISD's Child Nutrition Program. The finding recorded on the Corrective Action Plan (CAP) was:

> "Incomplete food production records are being kept of meals served and claimed for reimbursement at North Elementary School. Documentation was not consistent with recipe information on total number of planned portions prepared. For example, the district documented the entrée corndog as recipe X 96. The recipe attached served 48 portions X 96. This would have served 4,608 corndogs. The planned amount was 200 portions (1/ each)."

The district response to this violation was:

> "Production sheet training was held on Thursday, March 16, 2006, for all managers. We reviewed recipes to ensure that they are watching the correct yield. Beginning March 20, production records are now sent to the director of Food Service daily via e-mail for review, and corrections are noted on a copy and returned to the managers if needed. Individualized training will be held if errors occur. Monthly manager meetings will discuss common errors found with production records."

This error on the production record should have been discovered by the director or employee who entered the information into the nutrient analysis program to be evaluated, and the menu adjusted to meet the required nutrients for the next cycle. This error would have greatly distorted the nutrients in the nutrient analysis for this menu at this school and would have been recognized, unless the information was never entered into the nutrient analysis program.

As demonstrated at North Elementary on February 23, 2011, the food production records continue to fail to reflect what was actually prepared. This invalidates the documentation necessary to demonstrate the meals served and claimed met the USDA NSMP requirements. This error is one that must be observed onsite at the time of preparation to be identified.

If the district cannot ensure that district recipes will be followed and that food production records will actually reflect the foods used in the preparation of the meal, the district's reimbursement is at risk.

The district should ensure that food service staff are following standardized recipes and maintaining accurate food production records. In addition, the director of Food Service and other district reviewers could more closely evaluate what is actually prepared in individual kitchens if the amount of food prepared was recorded in purchase units (as recorded with the food-based systems). Past food production records could be spot checked without having to be onsite. This system could be adopted at least until the district can ensure that recipes are followed precisely, and food production records actually reflect what was produced. This addition would not prohibit the district from continuing to enter the recipe number and multiple of the recipe used.

Reclaiming of reimbursement funds by TDA is dependent on the nature, extent, and longevity of the violation. The district must correct this problem to ensure its reimbursement remains intact.

The assistant superintendent of Finance and Operations that oversees the Child Nutrition Program indicated to the review team that since onsite work, "all district employees have been re-trained on following recipes to ensure we are maintaining accurate food production records (and) routine monitoring is in place to ensure that all recipes are being followed."

This recommendation can be implemented with existing resources.

NUTRIENT ANALYSES AND REIMBURSABLE MEALS (REC. 51)

LISD does not have adequate nutrient analysis documentation to demonstrate that the district meals claimed for federal reimbursement during school year 2010–11 met the requirements of the Nutrient Standard Menu Planning (NSMP) approach. LISD's nutrient analysis of the meals served and claimed for reimbursement does not consistently document what was actually planned and served in individual schools for each cycle.

The USDA allows schools to select from five different methods for planning menus for the NSLP and SBP. Three of these methods are food-based, and two are nutrient-based. A large majority (75 percent) of districts across Texas use food-based systems. Under the food-based systems, the menus are planned using a pattern including meat/meat alternates (M/MA); vegetables/fruits (V/F); grains/breads (G/B); and milk, in specified weights and measures, by grade level. The documentation of the content of the meals served and claimed under the food-based menu planning systems are menus, recipes, and food production records. Meeting the district's monitoring responsibility of food-based menus is relatively easy.

LISD has elected to use the NSMP, a method based on meeting a set of standards identifying eight key nutrients, in their targeted amounts, by week. Additionally, the district combines the breakfast and lunch analyses. NSMP is a computer-based menu planning system that uses approved computer software to analyze the specific nutrient content of menu items automatically while menus are being planned. It is designed to assist menu planners in choosing food items that create nutritious meals and meet the nutrient standards. Under this method, a nutrient analysis is based on district standardized and analyzed recipes, the nutrients contained in purchased-prepared products as reported by the manufacturers and individual school food production records. The nutrient analysis, not compliance with a meal pattern, is the documentation that the meals claimed and served met requirements.

The district must be able to show the nutrient analysis of a planned meal to determine if the meal meets requirements. However to truly monitor and test the system, an evaluation of the nutrient information for each specific recipe used (as stated on the food production record) and specific purchased-prepared product (as identified by a label in stock or on an invoice) must be performed on a sample of randomly selected menus. This is a long and complex, but necessary process to identify if the analysis is accurate. The wrong recipe (the district has several different recipes for some of the products they prepare) or the wrong manufacturer's code on a purchased-prepared product can make the analysis appear to meet nutrient requirements when it actually does not.

All schools using the NSMP approach must provide the analysis based on weighted averages. This means the menu

analysis must be adjusted for each school, for each cycle, based on the food production record from the last time the menu was served in that school. **Exhibit 9–7** and **Exhibit 9–8** show the required nutrients of the NSMP Breakfast and Lunch, respectively.

It must be noted that the USDA protocol identified for completing the nutrient analysis of meals served is complex and takes time to understand. A full description of the requirements of this process may be found at the following website: http://www.fns.usda.gov.

Prior to serving the menu on an upcoming cycle, no one in the district adjusted menus for each school with the number of servings actually selected by students the last time the menu was served. According to the director of Food Service, the district is behind on updating the nutrient analysis of the menus; however, this is not the only reason for this finding. As explained in a previous recommendation, the district staff in individual school kitchens have not always followed recipes or recorded the production information accurately. In addition to those examples already discussed, some of the portion sizes of fruits and vegetables at North Elementary were significantly smaller than the food production record indicated was planned and served.

A very limited number of nutrient analyses were available for review to use in validating the system. When the nutrient

EXHIBIT 9–7
MINIMUM NUTRIENT AND CALORIE LEVELS FOR SCHOOL BREAKFASTS

NUTRIENT STANDARD MENU PLANNING APPROACHES (SCHOOL WEEK AVERAGES)

	MINIMUM REQUIREMENTS		
NUTRIENTS AND ENERGY ALLOWANCES	**PRE-SCHOOL**	**GRADES K–6**	**GRADES 7–12**
Energy allowances (calories)	388	554	618
Total fat* (as a percentage of actual total food energy)	1	1	1
Saturated fat** (as a percentage of actual total food energy)	2	2	2
Recomended Daily allowance (RDA) for protein (g)	5	10	12
RDA for calcium (mg)	200	257	300
RDA for iron (mg)	2.5	3.0	3.4
RDA for Vitamin A (RE)	113	197	225
RDA for Vitamin C (mg)	11	13	14

*Total fat not to exceed 30 percent of calories over a school week.
**Saturated fat not to exceed 10 percent of calories over a school week.
SOURCE: United States Department of Agriculture Program Aid, Menu Planner for Healthy School Meals, FNS-303, Rev. 2008.

EXHIBIT 9–8
MINIMUM NUTRIENT AND CALORIE LEVELS FOR SCHOOL LUNCHES

NUTRIENT STANDARD MENU PLANNING APPROACHES (SCHOOL WEEK AVERAGES)

	MINIMUM REQUIREMENTS			OPTIONAL
NUTRIENTS AND ENERGY ALLOWANCES	**PRE-SCHOOL**	**GRADES K–6**	**GRADES 7–12**	**GRADES K–3**
Energy allowances (calories)	517	664	825	633
Total fat* (as a percentage of actual total food energy)	1	1	1	1
Saturated fat** (as a percentage of actual total food energy)	2	2	2	2
RDA for protein (g)	7	10	16	9
RDA for calcium (mg)	267	286	400	267
RDA for iron (mg)	3.3	3.5	4.5	3.3
RDA for Vitamin A (RE)	150	224	300	200
RDA for Vitamin C (mg)	14	15	18	15

*Total fat not to exceed 30 percent of calories over a school week.
**Saturated fat not to exceed 10 percent of calories over a school week.
SOURCE: United States Department of Agriculture Program Aid, Menu Planner for Healthy School Meals, FNS-303, Rev. 2008.

analyses for specific dates and schools were requested they were not available for review. Specific dates that were requested in advance or were selected by the director were provided.

The district should monitor the system used for analyzing the nutrients in menus planned to meet the federal requirements for reimbursable meals served under the NSMP approach. Because nutrient analyses using weighted averages are the documentation required to support the claim for reimbursement, reimbursement funds could be in jeopardy if the district does not maintain current and accurate nutrient analysis of all meals, by school and cycle. The district may elect to change their system of menu planning to a food-based system (with the approval of the FSMC), which may be considerably easier for a district employee to monitor. If the district elects to make such a change, it should amend the LISD policy statement on file with TDA.

From the time of the review team's onsite analysis, the district reported that their software "NutriKids" is up to date and will be updated as changes are made to the menu. The district should however, take note that the "system" at issue is not the software but instead the operational system that is in place for using the software. This means the menu analysis must be adjusted for each school, for each cycle, based on the food production record from the last time the menu was served in that school.

It is important, therefore, that a nutrient analysis be prepared by the director of Food Service regarding information found in food production records for each school in light of not all recipes being followed, production record consequently not being accurate and portion sizes in fruits and vegetables at North Elementary were smaller than production records indicated as previously mentioned in this finding.

This recommendation can be implemented with existing resources.

FOOD EXPIRATION DATES (REC. 52)

LISD lacks procedures to deal with expired food products. A case of expired, unflavored skim milk dated February 18 was found on the serving line of South Elementary School on February 24, 2011. Once food has exceeded its shelf life, it should be destroyed or returned to the vendor for credit.

All foods that have exceeded their shelf life are not necessarily unwholesome; however, they are beyond their peak of quality. If the district does not monitor the expiration date of foods, and potentially hazardous foods in particular, they risk not only providing foods that are beyond their peak in freshness but potentially causing food poisoning if an expired hazardous food is consumed.

The district should develop a process to monitor the expiration dates of food purchased and served in the child nutrition program. It should ensure that expired food does not reach the serving line.

Subsequently, since the completion of onsite work, district officials have remarked that "all food service employees have re-trained on First In-First Out and date marking. Monitoring is in place to ensure the process is working."

This recommendation can be implemented with existing resources.

DISTRICT CHARGE POLICY (REC. 53)

LISD's charge policy when students do not have money for meals has not been upgraded to take into account federal reimbursement claim guidelines. The district's policy for charging meals when a child comes through the serving line with no money creates conflict between the food service staff and principals, teachers, and parents. Critics of the policy indicate that it embarrasses children. In addition, LISD's charge policy only allows for one charge in secondary schools; therefore, the alternate meals served in these two schools may not be reimbursable.

According to district interviews with the review team, the procedure is that; when a child has excess charges and reaches the cashier, the tray is taken from the child and replaced with a peanut butter and jelly sandwich, fresh fruit, and milk. Moreover, the director of Food Service indicated that the alternate meal is also supposed to include a vegetable. These meals are served at no cost to the student, and there is no limit to the number of days a child can take the alternate meal. The director stated that these alternate meals are claimed for reimbursement.

The Texas Department of Agriculture states that schools are not required to serve children who receive reduced-price or full-price meals, but do not have money to pay. TDA recommends that districts establish a charge policy, even if it is a no-charge policy, and may provide an alternative meal at the district's cost. Parents and students should be informed of the limitations of the established policy.

Many districts use a charge policy that appears to work to everyone's advantage. A bank is set up in the principal's office, and the child may come and get a ticket from the

office if he/she has no money to pay. At the end of the week, the cashier cashes in the tickets from the bank. The child is not embarrassed and receives the same meal as everyone else, and the principal is aware that the child has a problem. The food service staff may send a note to parents for the principal, but they are not responsible for trying to recoup the money when parents are slow or refuse to pay. The director of Food Service suggested that she could set up a principal's account on the cash register and eliminate the child from having to go to the office.

The following is a recent USDA interpretation of how alternate meals may be reimbursable. In order to provide flexibility to school districts, the USDA does not set federal policy on extending credit to children. Local school food authorities and the state agency (in this case TDA) are responsible for setting local policy on the system for collecting payment for school meals. USDA encourages schools to consider the children's need for good nutrition in order to enhance their performance in school. Schools are also required to replace lost meal tickets or provide equivalent meal arrangements at least three times within the school year for needy children. Schools may also extend their meal replacement policy for needy students to include paying students, allowing a certain number of charged meals for paying students without lunch money or meal tickets, but the schools are not required to do so. Some schools choose to provide children who do not have lunch money or a ticket at least an alternate meal such as a peanut butter sandwich, milk and a piece of fruit, or they may allow students to charge a certain number of meals. Most schools find they must set limits on the replacement of lost meal tickets or the number of times students may charge meals due to abuse by students (or parents) who neglect to reimburse the school.

Assuming that the school has a policy, and it is consistent with the three-strike approach and then an alternate meal must be served, then the meal may be reimbursable depending on what they served to the student. If the alternate meal fulfills the same role in the menu (entrée, side, fluid milk) and includes similar foods (from the same food group), then the alternate meal can be reimbursable. However if the meal only includes a cheese sandwich and juice, for example, then the meal would not be reimbursable.

The district should establish a charge policy using a system that accommodates the concerns of principals, teachers, and parents. Prior to developing a new charge policy for the district, LISD should contact TDA to clarify the state interpretation on this issue. The district should note that for each alternate lunch served, $0.28 in reimbursement is generated. After FSMC fees, the revenue remaining to provide food, labor, and non-food expenses for alternate meals is $0.11. LISD indicated after onsite work that they plan to review the current charge policy.

This recommendation can be implemented with existing resources.

OFFER VERSUS SERVE AND WASTE ISSUES (REC. 54)

LISD has not implemented Offer versus Serve at the South Elementary School. Although the decision to allow students to refuse foods they do not intend to eat is only required at the secondary level, use of this provision encourages variety and consumption; and eliminates waste. Offer versus Serve is the regulation that allows children to be offered a full meal; however, they may refuse a limited number of components of the meal that they do not intend to eat, and the meal remains reimbursable. The lunch plate waste on February 24, 2011, was excessive at South Elementary since it does not implement the Offer versus Serve methodology. The cafeteria aides indicated that the plate waste was normal as observed. **Exhibit 9–9** shows the value of the full servings of foods that were discarded; if the child ate a partial serving of the food item, it was not counted as waste.

Moderate plate waste was observed at the North Elementary School, and excessive plate waste was observed at the Lamesa Middle School. The meal service at Lamesa High School was not observed.

Among the items discarded at North Elementary School, the most notable was the sandwich. The recipe had not been followed, and the director concurred that the menu item appeared to be BBQ beef rather than Sloppy Joe. The Sloppy Joe recipe calls for a significant amount of green bell pepper and onion. When the sandwich filling was observed, there was no evidence of these two vegetables. Most children who took this item threw away the entire sandwich or a significant portion of it. The sandwiches were assembled prior to the serving period and stacked in long pans. It is difficult to maintain the internal temperature of hot sandwiches placed in buns in advance and held. When on the serving line, the sandwich registered 130° F. It is not known if the temperature of the product, or the product itself, was the reason for the sandwiches not being eaten.

According to TDA's *Administrator's Reference Manual*, food should maintain a minimum temperature of 140° F during the serving period. The district uses a temperature chart to

EXHIBIT 9–9
WHOLE SERVINGS OF FOOD DISCARDED AT SOUTH ELEMENTARY, LUNCH

Tables Counted	1	2	3	4	5	6	7	8	9	Trays Observed 116		
Number at Table	13	15	7	13	15	11	15	14	13			
										Totals Servings Discarded	**Cost Per Serving**	**Total Cost by Discarded Item**
Pizza Stick*	7	5	0	10	0	5	11	11	5	54	$0.51	$27.54
Corn	9	10	3	5	12	9	0	0	8	56	$0.14	$7.84
Banana	5	6	4	6	4	6	7	6	11	55	$0.048	$2.64
Pretzel Stick	8	10	7	13	14	11	14	14	1	92	$0.12	$11.04
Sauce	0	0	0	5	0	3	4	0	1	13	$0.10**	$1.30
Milk	0	0	0	0	0	0	0	0	1	1	$0.25	0.25
Total Value of Full Servings Discarded by 116 students												**$50.61**

*This frozen prepared product was sent by the distributor as a substitute for the product that was actually planned and ordered. The director indicated that the distributor also sent instructions on the portion size to serve and those instructions were followed. If this substitute product were served again, the district would be wise to evaluate its effect on the nutrient content of the menu. One stick may have been sufficient for children in Grades K–3.
**Estimated cost.
SOURCE: Developed by Review Team based on surveying lunch plate waste conducted at South Elementary School lunch, February 24, 2011.

track the temperatures of foods during preparation and service. The South Elementary School manager could not locate the temperature chart on February 24, 2011, during the review. Temperature of food served influences customer perception of the quality of the food.

At the Lamesa Middle School, it appeared that the reason for the waste was quality issues. An unusual amount of pizza, whole breaded chicken patty sandwiches, and French fries were discarded by students. The director suggested that one of the reasons the whole sandwiches and some of the other entrees are thrown away is that under NSMP, the student must select an entrée even if they do not want one in order to select other items and have a reimbursable meal. She also stated that since the chicken patties are served on a whole grain sandwich roll, many students will reject the sandwich because they do not like the roll.

After meal service, a sample plate of foods from the serving line was prepared, tasted, and discussed by the director and reviewer. The crust on the pizza appeared undercooked and gummy. On further investigation of the product, it was found that the district recipe was not followed. The recipe required that the pizza crust be par baked prior to applying the toppings. This step was skipped, identifying the reason for the low quality of the product. The chicken patty was described by the director as extremely dry. It could not be determined if this was an issue with the product itself, or the process by which it was heated and held. The French fried potatoes were very limp and unappealing. The director indicated that that was an issue with the product itself, and that it is her intention to change that product to potato stars, a shredded and formed potato product.

If the district does not control the amount of food being thrown away by students, it will continue to spend more than is necessary for food in the preparation and service of reimbursable meals.

The district should implement Offer versus Serve at all schools, in all grade levels and conduct periodic waste studies. Offer versus Serve should also be applied at all grade levels at all schools in an effort to reduce waste. By allowing the students to refuse foods, the variety of vegetables and fruits could be expanded, allowing students a greater choice in what they select, which might encourage better consumption. Food that is discarded by students does not contribute to students' health and reduces the amount of funds that could be used to provide fresh fruits, for example, that may not be currently affordable. Fresh blueberries, strawberries, raspberries, star fruit, and exotic melons, for example, bring interest to the serving line, even when used as a garnish on another food.

In addition, periodic waste studies will provide the district with evidence of what students would like based on what they choose, and what they discard. The district should monitor waste to identify the reasons for the waste and work with the director of Food Service to find ways to reduce waste, either by cutting portion sizes, replacing discarded foods with foods that have more student appeal, ensuring the

foods are prepared according to the recipe, or that foods are held and served at the proper temperature.

Based on the October 2010 claim, the ADP for South Elementary School is 386 lunches. The cost of the foods discarded on the 116 trays that were observed and counted was $50.61 (only full servings were counted). Extrapolating that cost over 386 meals served brings the total discard to a value of $168.53 or (386/116 = 3.33 rounded x $50.61) daily x 180 days = $30,335.40 annually or $30,335 (rounded) for lunch at South Elementary School. No calculations of the value of foods discarded as tray waste was performed for any schools other than South Elementary School.

District officials have since indicated that "straight serve at South Elementary is a campus administrative decision, this will be reviewed with the new principal prior to the opening of school in August and the recommendation will be made to implement offer vs. serve."

While implementation of Offer versus Serve is not a requirement at the elementary level, and South Elementary is in compliance with federal regulations, it is still a good management decision to allow students the food they do not intend to eat. The district should be commended for their effort to ensure this school also practices Offer versus Serve.

FOOD PRODUCTION (REC. 55)

LISD is not controlling the amount of food produced in individual kitchens; the elementary kitchens are over producing, which contributes negatively to the CNP fund balance. The South Elementary School teachers take morning meal counts of the entrée each student selects to eat at lunch. In theory, the kitchen then uses these meal counts to scale food production for the day. On the day of the visit to this school, the kitchen employees over produced at both breakfast (there are no meal counts for breakfast) and lunch. The district must determine the effectiveness of the meal counts in controlling food production. The director indicated that morning counts were taken at both elementary schools; however, she later discovered that North Elementary School discontinued morning counts some time ago and according to the manager is doing fine without them. Morning meal counts take valuable classroom time and should only be used when they are necessary to effectively reduce over production of food.

At North Elementary School, on February 23, 2011, four pans of cheeseburgers were found in the walk-in refrigerator (approximately 120 sandwiches). The sandwiches were assembled and the cheese on some of them appeared to be melted. When asked, the manager indicated that they were left over from the day before and would be reheated, in the buns, for the following day. It is difficult to bring a long pan of assembled cheeseburgers to temperature in the time allotted for them to remain wholesome and still maintain the quality of the sandwich.

Once the director discovered the plan, the manager was directed to dispose of the cheeseburgers. The estimated food cost for one cheeseburger is $0.45; $0.07 cheese slice + $0.15 char-patty + $0.23 bun = $0.45. Because pricing for the LISD hamburger bun was not available, the price used is from the Region 17 food service cooperative. Rebates on commodity processed foods are not considered in this example due to lack of available district information. The food cost on one cheeseburger $0.45 x 120 cheeseburgers disposed of = $54. If a similar discard happened once per week in each elementary school, the annual total would be: $54 x 2 schools = $108 x 36 weeks = $3,888.

At South Elementary School, where teachers take the morning meal count and children may not refuse foods, the kitchen had 100 pretzel sticks at $0.12 each; and 100 servings of pizza sticks at $0.51 each left over. The kitchen manager was unable to explain why so many servings of these products were prepared. The total food cost on these two discarded leftover items is $63. If a similar incident happened once per week in each elementary school the annual total would be $63 x 2 = $126 x 36 weeks = $4,536.

The Razzberry Dazzlers (the whole grain cookie-type product offered at breakfast) were not selected by many students in the classroom and were returned to the kitchen and disposed of by kitchen staff. The cost of one Razzberry Dazzler is $0.26; 100 servings were returned and discarded, for a total value of $26.

Although breakfast in the classroom is a service to children, it has the potential to produce waste if the food production staff is not careful in tracking what is returned from the classrooms and scaling back what is sent during the next cycle of the menu. Otherwise, waste can be costly as demonstrated with the Razzberry Dazzlers. Other breakfast entrees offered during February 2011 that, according to elementary managers and staff, were most likely to be returned from the classrooms uneaten and discarded included: bacon egg cheese bagel (served twice), egg and cheese taco (served four times), cinnamon waffles (served twice), cinnamon toast, breakfast burrito, Razzberry Dazzle

(served three times), sausage biscuit, savory biscuit, and French toast sticks.

The discussion focuses on products unselected and returned to the kitchen to be discarded. The foods that are selected and discarded by children in the classroom must also be included in the cost of waste. The kitchen does not send spoons to the classrooms for use with ready-to-eat cereal causing children to eat the cereal dry. (The director indicated that teachers may request spoons.) No syrup is sent with waffles and French toast. Cereal without spoons and waffles and French toast without syrup may be discarded rather than eaten, even though selected by the child as part of the reimbursable breakfast. No count of foods discarded uneaten in the classroom was performed.

In both the North and South Elementary Schools, the kitchen is close enough to the classrooms to allow for additional food as demand requires. Two conditions at North Elementary deserve mention in that they increase the cost of food for breakfast. The first is that some teachers require that the same number of each component of the breakfast be sent by the kitchen as there are students enrolled in the classroom, even though it is common knowledge that all children will not select all items, and that some children may be absent from school. The director indicated that many of the foods sent to the classroom are not returned even though they were not a part of a claimed reimbursable breakfast. One teacher indicated that she gives leftover breakfast items, such as bowl pack cereal, as prizes in her classroom. Allowing teachers to direct food production in this manner adds to the foods that may be thrown away, and, even if eventually consumed by someone in another setting, it adds to the food costs of the department.

If the district does not scale back food production based on need, they will continue to discard higher than average amounts of costly food as overproduction.

The district should ensure that the schools produce servings based on prior production records. This information can be generated by school, as part of the required nutrient analysis of menus to document the nutrient content of meals. The software will generate a food production record for each school indicating the servings to be prepared. This recommendation can be implemented with existing resources.

If $26 (the cost of the Razzberry Dazzlers discarded at South Elementary) were the daily cost of tray waste and foods returned to the kitchen unselected and discarded for classroom breakfasts in each of the district's elementary schools, the cost to the district is $26 x 2 schools = $52 per day x 180 days = $9,360 annually. Totaling the three examples described—$3,888 (cheeseburgers) + $4,536 (pizza and pretzel sticks) + $9,360 (Razzberry Dazzlers) = $17,784 in annual costs of potential overproduction in the two elementary schools. The district can turn these costs into an annual savings of $17,784 by producing servings based on prior food production records.

District officials have indicated that all managers have received additional production record training this summer (2011) at a Region 17 workshop.

TRAY WASTE AND DISTRICT FOOD PURCHASE PREFERENCES (REC. 56)

LISD does not monitor tray waste in the cafeterias or take an active role in determining the types of products that are purchased and served. When the district does waste studies and finds products such as the limp French fries or the dry chicken patty being discarded, it may be necessary for LISD to take a more active role in determining the types of products that are purchased. Currently, the FSMC employees make all determinations as to which particular product manufacturers and codes are purchased. However, regional preferences do play an important part in the acceptability to children of various frozen purchased-prepared foods.

Many districts conduct tasting parties with various grade levels of students to determine the types of products that are acceptable to them. The Region 17 food purchasing group conducts large food shows that directors of Food Service, managers, staff members, and students attend to select items they prefer or intend to purchase. The district might inquire as to whether or not these shows would be available for participants of non-member districts. This gives staff members and children input into the program.

The Exhibit E, Food Specifications, of the request for proposal and contract for FSMC includes a place for the district to provide detailed descriptions of the types of foods the district currently purchases and wishes to serve. The food specifications used in the current document are not effective in providing detailed guidelines to the FSMC regarding frozen purchased-prepared items that are acceptable to the students of LISD.

It is important to consider developing clear and specific food descriptions for high volume items in this section. Since most of the entrees are purchased-prepared, such as beef

patties, chicken nuggets and patties, and burritos, the district can impact the quality of food served by adding guidelines to this section. Ingredients such as mechanically separated (species), soy isolate, soy concentrate, soy flour, dried whole egg, finely textured beef, and cheese substitutes are commonly used in school products to contribute to the M/MA component of the meal. The addition of these ingredients can reduce the cost and improve the nutritional content. However, depending on the type(s) and quantities used, they can also contribute to a product not being acceptable to children. The purchasing coordinator for the Region 17 food service cooperative, as well as food manufacturers' representatives and brokers, would be a good source of applicable information.

The majority of distributors belong to a buying group or has support of a corporate purchasing department. Each group has standards for its first, second, and third quality labels. Products sold under each label are color-coded or have unique logos. School food service purchasers who know these codes can order the quality desired. Distributors will provide a chart showing their labels for various products and grades. The first, second, and third quality labels are based on federal grade standards.

Exhibit 9–10 displays an example of the quality label of several distributors. When conducting monitoring reviews of the food service operations, the district should use a chart such as this to determine that they are getting the quality of canned fruits and vegetables specified in the contract.

The director indicated that she cannot change the products she purchases without the approval of the FSMC officials on a product-by-product basis. If the district's students and staff had participated in taste-testing activities, and the results recorded, the director would have data to support district input on which particular products are acceptable and available on the market.

If the district does not take a more active role in determining the types of products to be served in the school cafeterias, it misses an opportunity to best meet the needs of the students through the NSLP and SBP.

The district should monitor tray waste and participate in food tasting events to determine district food purchase preferences. Additionally, the district should be participating in food tasting events and with staff recording the characteristics of those products deemed acceptable by students and staff. The district should provide the FSMC with guidelines it can use in making decisions on which foods are best suited for purchase by the district. These guidelines should be incorporated into the Exhibit E, Food Specifications, of the request for proposal and contract for the FSMC.

According to LISD officials, "waste logs are being implemented at each campus. Each manager will [then] review, to determine what items can be re-served or thrown away. Additionally, the district will consider food tasting events as part of our Student Nutrition Advisory Committees."

This recommendation can be implemented with existing resources.

FOOD PRICES (REC.57)

LISD has not researched the prices paid for food including rebates and credits as compared to those paid by other districts in the surrounding area. The district does not consolidate and reconcile individual school invoices from food distributors to validate the monthly direct food costs charged by the FSMC. LISD receives rebates and other credits for food, but does not know how they are earned. The district has not compared FSMC food pricing to the prices paid by other school districts in the surrounding area or the Region 17 food service cooperative.

Each month, the district receives rebates and other credits on food purchases. Neither the assistant superintendent for Finance and Operations nor the director of Food Service could explain how the district earns those rebates and other credits. They may be rebates for the value of USDA donated foods that were processed, volume discounts generated by the FSMC cooperative buying group, a combination of both, or something else. The district has not received a detailed explanation of these rebates and other credits.

This documentation should be requested by LISD from the FSMC. The district pays the food costs based on monthly district totals by category, i.e., baked goods, beverages, dairy-ice cream, dairy-milk, food-other merchandise, groceries, meat-other, and produce. The district should request all vendor invoices monthly to validate the FSMC monthly reconciliation worksheet prior to reimbursing the FSMC for these direct costs.

Exhibit 9–11 demonstrates the cost per serving of random products found on copies of a few available LISD invoices from SYSCO West Texas. These prices are compared to Region 17 food service cooperative pricing. There will always be variations in prices between individual bids, depending on

EXHIBIT 9–10
EXAMPLES OF DISTRIBUTOR GROUP QUALITY LEVEL LABELS

Distributor Group	First quality fancy vegetables, choice fruits	Second quality extra standard vegetables, standard fruits	Third quality standard vegetables, substandard fruits
Premier Foodservice Distributors of America	Nugget Brand Black	Nugget Brand Red	Nugget Brand Green
	PLEE-ZING Red Lil Brave Blue	LITTLE MOMMIE Red Lil Brave Red	PARTAKE Red Lil Brave Green
	Pocahontas Pocahontas	Mount Stirling	
	Sysco Imperial and Classic	Sysco Reliance	Sysco Valuline
Unipro Foodservice, Inc.	Nifda RED MERIT	Nifda CHEF-PAK TRADITIONAL	Nifda Econo-Pak CITATION
	US FOODSERVICE	US Blue	US Red HARVEST VALUE

Exceptions: Apples, Applesauce, Cherries packed under First Quality Label are Grade A

SOURCE: National Food Service Management Institute, A Purchasing Systems Manual for School Food Service 2nd Edition.

the winning distributor, and the volume of the bid. Generally, there will be a mix of pricing with some higher and some lower pricing between one bid and another. For some products, there may be quality differences. **Exhibit 9–11** uses the same product codes as often as possible, and a like product was used and identified when the two bids did not contain the exact same product. The exhibit is provided to demonstrate that there is a difference. The only way to determine the savings one bid will provide the district over another is to apply the pricing using the volume of product that will be purchased for the school year. It is sufficient to use only the high volume items, such as pizza, char-patties,

EXHIBIT 9–11
REGION 17 FOOD SERVICE CO-OP PRICING VERSUS LAMESA ISD PRICING ON RANDOM ITEMS

REGION 17 FOOD SERVICE COOPERATIVE PRICING				LAMESA ISD PRICING THROUGH FSMC			
PRODUCT	PACK	PRICE/ CASE	PRICE/ SERVING	PRODUCT	PACK	PRICE/ CASE	PRICE/ SERVING
G.M. Bowl Pack Cheerios	96 ea.	$15.61	$0.163	G.M. Bowl Pack Cheerios	96 ea.	$19.49	$0.203
G.M. Cinnamon Low Sugar	96 ea.	$15.61	$0.163	G.M. Cinnamon Low Sugar	96 ea.	$19.49	$0.203
Advance Char Patty	200/2.5	$25.76	$0.129	Advance Char Patty	200/2.5	$29.01	$0.145
Swift Ground Beef 80:20	Per Pound	$1.74	$0.148/ one ounce cooked lean meat	Firervr Lower Fat 85:15	Per Pound	$2.12	$0.177/ one ounce cooked lean meat
Advance Rib Patty	100/2.53 44-531-0	$26.05	$0.26050	Advance Rib Patty	100/2.5344-531-0	$27.03	$0.2703
Gold Fish Crackers	300/0.75 oz	$42.66	$0.14220	Gold Fish Crackers	100/0.75 oz	$20.34	$0.2034
Pears, Diced Seneca Foods	6/#10	$31.40	$0.22 per 1/2-cup	LOVIN S	6/#10	$39.85	$0.279 per1/2-cup
Fruit Cocktail Seneca Foods	6/#10	$31.02	$.2205 per 1/2-cup	Fruit Cocktail SYSCO Classic	6/#10	$35.53	$0.2525 per 1/2-cup
Pineapple Chunks or Tidbits REMA Foods	6/#10	$26.12	$0.174 per 1/2-cup	Pineapple Chunks EMPRESS	6/#10	$31.93	$0.21 per 1/2-cup
Peaches, Sliced Seneca Foods	6/#10	$28.58	$0.20 per 1/2-cup	Peaches, Sliced Carbtrl	6/#10	$43.98	$0.293 per 1/2-cup
Mandarin Oranges ATALANTA	6/#10	$22.69	$0.151 per 1/2-cup	Mandarin Oranges LOVIN S	6/#10	$43.05	$0. 289 per 1/2-cup
Apple Juice CAL-TEX	96/4 oz	$10.20	$0.106	Ardmore	72/4 oz	$10.41	$0.145
Heinz Ketchup	1000 /9 gm.	$13.85	$0.01385	Heinz Ketchup	1000/9 gm.	$18.56	$0.01856

SOURCE: Region 17 Food Service Cooperative Bid Award, 2010–11, and Lamesa ISD invoices 2010–11.

French fried potatoes, and canned fruits. The information to conduct an extensive study was not available to the review team.

If LISD fails to do a comparative price study, the district risks paying a higher cost for food than necessary.

The district should compare the food prices paid through the FSMC, to the prices paid by the members of the Regional Education Service Center XVII (Region 17) food service cooperative and other surrounding districts and consolidate and reconcile distributor invoices to validate direct food costs prior to paying the FSMC monthly invoice.

Using the lunch ADP for October 2010, which was 1,132 students, if 75 percent of the children served lunch and/or breakfast selected one-half cup of fruit each day (using the prices for diced pears [a difference of $0.059 per serving], fruit cocktail [difference of $0.032 per serving], pineapple chunks [difference of $0.036 per serving], mandarin oranges [difference of $0.138 per serving], and sliced peaches [difference of $0.093 per serving], for a total of $0.358 per serving for all five fruits in the exhibit), the district would save $10,942 (rounded) annually just buying these five fruits from the Region 17 bid. This savings is based on one serving of fruit $.358 x 849 = $303.94 per servings per week x 36 weeks = $10,942 rounded (one per week of each).

It is important to note that there are typically 300–500 food items on an average school bid, while the Region 17 bid has approximately 1,000 offerings.

Meal prices will be reviewed prior to the start of the 2011–12 school year according to the assistant superintendent of Finance and Operations.

STUDENT FULL-PRICE MEALS (REC. 58)

The student and adult full-price breakfast and lunch prices do not cover the cost of producing and serving the meals. Student and adult breakfast and lunch prices are less than the federal reimbursement for a free meal.

Exhibit 9–12 identifies school year 2010–11 student and adult meal prices for school districts in the surrounding area. Of the three districts surveyed, LISD is the only one that does not provide a universal breakfast for all students. Two districts provide free lunches to all students. LISD has a lower price for lunch for high school students. There is one district that charges more for an adult lunch and one that charges less.

Exhibit 9–13 shows that the adult breakfast is $0.51 less than the reimbursement on a student free breakfast, and the adult lunch price is $0.50 less than the reimbursement on a student free lunch. Districts must ensure, to the extent practicable, that the federal reimbursements, children's payments, and other non-designated nonprofit child nutrition revenues do not subsidize program meals served to adults. Breakfasts and lunches served to adults must be priced so that the adult payment in combination with any other revenues (i.e., school subsidizing as a fringe benefit) is sufficient to cover the overall cost of the meal, including the value of any USDA entitlement and bonus commodities used to prepare the meal.

In order for LISD full-price student and adult meal prices to equal the reimbursement for a free meal, the secondary student breakfast price would need to be raised to $1.50, the student lunch price would need to be $2.46, the adult breakfast price would be $1.76, and the adult lunch price should increase to $3. The director of Food Service suggested that middle school should be charged the same amount as high school because portion sizes are the same. The increase in pricing may be more palatable to parents of middle and high schools if the universal breakfast were extended to these two schools. Students receiving full-price meal benefits would receive daily breakfast and lunch for $2.46. The district should review the meal prices annually after USDA releases the reimbursement rates. Small price increases made annually are less difficult to present to parents than large increases introduced less often.

Exhibit 9–14 shows the potential daily and annual (180 days) increase in revenue if prices are increased to the level of a reimbursable free breakfast and free lunch.

If the district does not raise prices of an adult and full-price student breakfast and lunch as necessary to cover all of the costs of producing and serving these meals, LISD will continue to lose funds on each full-price meal served.

The district should consider raising adult and student full-price breakfast and lunch prices to ensure that the revenue generated is sufficient to cover the cost of preparing and serving the meals.

A $75.66 breakfast revenue increase per day + $116.93 lunch revenue increase per day = $192.59 total revenue increase per day. Annually the district could increase revenue by $34,666.20 or $192.59 x 180 days = $34,666 (rounded).

Since the review team's onsite work in February 2011, the assistant superintendent of Finance and Operations indicated that the district intends to review prices prior to the start of the 2011–12 school year.

EXHIBIT 9–12
SCHOOL MEAL PRICES OF DISTRICTS IN LAMESA ISD AND THE SURROUNDING AREA DISTRICTS
SCHOOL YEAR 2010–11

MEAL PRICING	BREAKFAST	LUNCH						
SCHOOL DISTRICT	REDUCED-PRICE SECONDARY ONLY	FULL-PRICE ELEMENTARY	FULL-PRICE SECONDARY	STAFF/ VISITOR	REDUCED-PRICE	FULL-PRICE ELEMENTARY AND MIDDLE	FULL-PRICE HIGH SCHOOL	STAFF/ VISITOR
Lamesa	**$0.30**	**Free**	**$1.00**	**$1.25**	**$0.40**	**$1.75**	**$2.00**	**$2.50**
Dawson	Free	Free	Free	$1.75	$0.40	$1.75	$2.25	$2.25
Klondike	Free	Free	Free	Unknown	Free	Free	Free	Unknown
Sands	Free	Free	Free	Unknown	Free	Free	Free	$4.00

SOURCE: Telephone survey by Review Team of the represented districts, February 14, 2011.

EXHIBIT 9–13
LAMESA ISD STUDENT AND ADULT MEAL PRICES COMPARED TO TOTAL REVENUE GENERATED BY A FREE BREAKFAST AND LUNCH STUDENT MEAL

CATEGORY OF MEAL BENEFITS	PRICE PAID	REIMBURSEMENT	SEVERE NEED	USDA DONATED FOODS VALUE	TOTAL PER MEAL REVENUE	DIFFERENCE BETWEEN FREE AND STUDENT AND ADULT PAID
Breakfast						
Free	$0.00	$1.48	$0.28	N/A	$1.76	$0.00
Reduced-Price	$0.30*	$1.18	$0.28	N/A	$1.76	$0.00
Full-Price Elementary	Free	$0.26	$0.00	N/A	$0.26	N/A
Full-Price Secondary	$1.00	$0.26	$0.00	N/A	$1.26	-$0.50
Adult	$1.25	$0.00	$0.00	N/A	$1.25	-$0.51
Lunch						
Free	$0.00	$2.72	$0.02	$0.26	$3.00	$0.00
Reduced-Price	$0.40**	$2.32	$0.02	$0.26	$3.00	$0.00
Full-Price Elementary and Middle	$1.75	$0.26	$0.02	$0.26	$2.29	-$0.71
Full-Price Secondary	$2.00	$0.26	$0.02	$0.26	$2.54	-$0.46
Adult	$2.50	$0.00	$0.00	N/A	$2.50	-$0.50

*Schools where at least 40 percent of the lunches served during the second preceding school year were free or reduced-price qualify for additional "severe need" school breakfast reimbursement.
**The reduced-price breakfast cannot exceed $0.30.
SOURCE: Current district meal prices and United States Department of Agriculture reimbursement rates 2010–11.

EXHIBIT 9–14
LAMESA ISD REVENUE GENERATED USING CURRENT ADP AND INCREASED PRICING

	BREAKFAST			LUNCH		
SCHOOL	DAILY FULL-PRICE ADP	DIFFERENCE IN REVENUE PER MEAL	POTENTIAL DAILY INCREASE IN REVENUE	DAILY FULL-PRICE ADP	DIFFERENCE IN REVENUE PER MEAL	POTENTIAL DAILY INCREASE IN REVENUE
Lamesa High School	4	$0.50	$2.00	17	$0.46	$7.82
Lamesa Middle School	80	$0.50	$40.00	41	$0.71	$29.11
North Elementary School	NA	NA	NA	47	$0.71	$33.37
South Elementary School	NA	NA	NA	53	$0.71	$37.63
Adult at all schools	66	$0.51	$33.66	18	$0.50	$9.00
Potential Daily Increase			**$75.66**			**$116.93**

SOURCE: Lamesa ISD Monthly Record of Meals Claimed, October 2010.

PARTICIPATION RATES (REC. 59)

LISD has not evaluated methods to increase participation in the School Breakfast Program or National School Lunch Program. During October 2010, the average daily participation (ADP) or the average number of students eating lunch in the school cafeterias was 1,132 students, or 58.8 percent out of 1,924 total students (as of the last published Academic Excellence Indicator System report of 2009–10) while the ADP in the SBP was 1,063 students, or 55.2 percent. These numbers are low especially in the SBP since two out of the four schools serve a free breakfast to all students under the universal breakfast program.

The review team analyzed two methods that LISD could implement to increase participation in the SBP and/or NSLP in the district. These methods include expanding universal breakfast to the secondary schools and closing the high school campus for lunch. The review team noted certain assumptions in the evaluation of these options which are noted within the following sections.

EXPANDING THE UNIVERSAL BREAKFAST PROGRAM

Currently the district provides universal breakfast at the elementary schools, but not at the middle and high schools. Universal school breakfast refers to any school program that

offers breakfast at no charge to all students, regardless of income. The director of Food Service indicated that she understands the importance of breakfast and the benefits it provides students and would like to expand the program to the middle and high schools.

According to the Food Research and Action Center, studies conclude that students who eat school breakfast increase their mathematics and reading scores as well as improve their speed and memory in cognitive tests. Research also shows that children who eat breakfast at school, which is closer to class and test-taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. Evidence has grown that children who eat school breakfast are less likely to be overweight and have improved nutrition. These children eat more fruits, drink more milk, and consume a wider variety of foods than those who do not eat breakfast or have breakfast at home. Schools that provide universal breakfast in the classroom report decreases in discipline and psychological problems, visits to school nurses and tardiness, increases in student attentiveness and attendance, and generally improved learning environments.

As a general rule, schools with 80 percent or more free or reduced-price eligible students can serve universal breakfast and cover their costs through economies of scale. Some schools with lower percentages of free and reduced-price eligible students can operate a universal breakfast program that is financially self sustaining, depending on what their costs are (labor, food, FSMC fees, direct and indirect costs both district and FSMC). The director of Food Service stated that the FSMC believes that the program can be successful at 40 percent of the enrolled students being approved for free and reduced-price meal benefits. This is a topic worthy of discussion with the FSMC officials. **Exhibit 9–15** displays the percentage of enrolled students approved for free and reduced-price meal benefits by school and districtwide using information from the October 2010 Monthly Claims Reports.

Depending on the opinion of the FSMC, the district might consider piloting a universal breakfast program at the Lamesa Middle and High Schools, even though the percentages of students approved for free and reduced-price meals is lower than 80 percent. LISD universal breakfast programs at the two elementary schools have been very successful in terms of participation, serving almost 800 breakfasts per day. This is partially due to the fact that elementary school students typically participate in the CNP at a higher level than middle and high school students. A critical factor that contributes to this success is the time the district is serving breakfast in the elementary schools, after the school day begins.

When there is an opportunity to provide a short nutrition break sometime prior to 10:00 AM, when all classes can be brought to the cafeteria to be served or provided a "grab and go" type breakfast, many secondary schools have achieved very high levels of ADP in the program.

It is important to note that it is imperative that free and reduced-price participation as well as full-price participation rises if the district provides a universal breakfast at the middle and high schools. Under a universal breakfast program, each free breakfast will be reimbursed at the current rate. Moreover, the revenue for each reduced-price breakfast will decrease by $0.30, the current price paid by the student, and the revenue

EXHIBIT 9–15
LAMESA ISD FREE AND REDUCED-PRICE ELIGIBLE STUDENTS AS A PERCENT OF ENROLLMENT BY SCHOOL AND DISTRICTWIDE OCTOBER 2010

SCHOOL	FREE	PERCENTAGE OF FREE	REDUCED-PRICE	PERCENTAGE OF REDUCED-PRICE	FULL-PRICE	PERCENTAGE OF FULL-PRICE	ENROLLMENT	# APPROVED FOR FREE AND REDUCED-PRICE	PERCENTAGE OF FREE AND REDUCED-PRICE
North Elementary	340	67.9%	26	5.2%	135	26.9%	501	366	73.1%
South Elementary	392	74.7%	20	3.8%	113	21.5%	525	412	78.5%
Lamesa Middle	310	61.1%	35	6.9%	162	32.0%	507	345	68.0%
Lamesa High	303	51.9%	47	8.0%	234	40.0%	584	350	59.9%
Districtwide	**1,345**	**63.5%**	**128**	**6.0%**	**644**	**30.4%**	**2,117**	**1,473**	**69.6%**

SOURCE: Lamesa ISD individual school Monthly Claim Reports, October 2010.

for each full-price breakfast will decrease by $1, the current price paid by the student.

Exhibit 9–16 demonstrates the reduction in available per meal revenue if participation in the free, reduced-price, and full-price categories remain the same as they were in October 2010, but all meals are provided free versus current revenue with pricing.

Exhibit 9–17 demonstrates the reduction in available per meal revenue if participation in all categories increases to 75 percent, but all meals are provided free versus revenue with current pricing. The decrease in per meal revenue is significant in each school.

The review team's analysis of this option determined that expansion of universal breakfast to the middle and high schools would not be recommended unless it is possible to provide the opportunity to participate at some time other than before the school day begins. Taking this action and not providing the breakfast free is another possibility. Participation may increase along with a la carte sales, if the breakfast period is scheduled at a later time than currently served. The review team was unable to determine the fiscal impact of this option without identifying participation increases in each category. However, the fiscal impact calculation would include the cost for breakfast, in addition to costs associated with the FSMC. The director of Food Service indicated that the current food cost for breakfast is $0.80. Food represents 38.37 percent of the cost per breakfast. Additional expenses could include 0.24 percent for FSMC Indirect Costs, 11.26 percent for FSMC Direct Costs, 2.81 percent for FSMC Management Fee, 4.47 percent for FSMC Administrative Fee, 0.66 percent for district direct costs, and 34.55 percent for labor; totaling 92.63 percent in additional expenses including food.

"CLOSING" THE HIGH SCHOOL CAMPUS FOR LUNCH

In addition to the potential to increase breakfast participation rates at breakfast by expanding the universal breakfast program to the secondary schools, the district could potentially increase participation rates for lunch at the high school if the district closes the campus for lunch. Currently, Lamesa High School has an open campus for lunch, meaning students may leave the campus for lunch. This factor contributes significantly to the low participation in the school lunch program. Lamesa High Schools students are not taking advantage of the services offered by the school cafeteria through the NSLP.

Exhibit 9–18 shows current versus projected revenue for Lamesa High School when ADP for breakfast is increased to 50 percent and ADP for lunch is increased to 60 percent.

EXHIBIT 9–16
PER PLATE REVENUE AVAILABLE FOR LAMESA MIDDLE AND HIGH SCHOOLS USING CURRENT ADP AND UNIVERSAL SBP REVENUE VERSUS CURRENT REVENUE
OCTOBER 2010

MEAL CATEGORIES	ADP PER DAY BY CATEGORY	APPROVED BY CATEGORY	PERCENTAGE OF PARTICIPATION BY CATEGORY	REVENUE PER MEAL BY CATEGORY	DAILY REVENUE FOR UNIVERSAL BREAKFAST AND CURRENT ADP	CURRENT DAILY BREAKFAST REVENUE WITH PRICING
Lamesa Middle School Universal Breakfast Per Meal Revenue versus Current Breakfast per Meal Revenue						
Free	116	310	37.42%	$1.76	$204.25	$204.25
Reduced-Price	10	35	29.40%	$1.46	$15.04	$18.13
Full-Price	80	162	49.14%	$0.26	$20.70	$100.30
Total	**206**				**$239.99**	**$322.68**
Per Meal Breakfast Revenue					**$1.16**	**$1.57**
Lamesa High School Universal Breakfast Per Meal Revenue versus Current Breakfast per Meal Revenue						
Free	68	303	22.38%	$1.76	$119.33	$119.33
Reduced-Price	5	47	10.64%	$1.46	$7.30	$8.80
Full-Price	4	234	1.67%	$0.26	$1.01	$4.91
Total	**77**				**$127.64**	**$133.04**
Per Meal Breakfast Revenue					**$1.66**	**$1.72**

SOURCE: Lamesa ISD individual school Monthly Claim Reports, October 2010.

EXHIBIT 9–17
PER PLATE REVENUE AVAILABLE FOR LAMESA MIDDLE AND HIGH SCHOOLS USING CURRENT ADP AND UNIVERSAL SBP REVENUE VERSUS CURRENT REVENUE
OCTOBER 2010

MEAL CATEGORIES	ADP PER DAY BY CATEGORY	APPROVED BY CATEGORY	PERCENTAGE OF PARTICIPATION BY CATEGORY	REVENUE PER MEAL BY CATEGORY	PROJECTED DAILY REVENUE FOR UNIVERSAL BREAKFAST WITH 75% ADP	PROJECTED DAILY REVENUE WITH 50% ADP AND A PRICED PROGRAM
Lamesa Middle School Universal Breakfast Per Meal Revenue with 75 percent Breakfast ADP						
Free	233	310	75%	$1.76	$409.20	$409.20
Reduced-Price	26	35	75%	$1.46	$38.33	$46.20
Full-Price	122	162	75%	$0.26	$31.59	$153.09
Total	**381**				**$479.12**	**$608.49**
Available Per Meal Revenue					**$1.26**	**$1.60**
Lamesa High School Universal Breakfast Per Meal Revenue with 75 percent Breakfast ADP						
Free	227	303	75%	$1.76	$399.96	$399.96
Reduced-Price	35	47	75%	$1.46	$51.47	$62.04
Full-Price	176	234	75%	$0.26	$45.63	$221.13
Total	**438**				**$497.06**	**$683.13**
Available Per Meal Revenue					**$1.13**	**$1.56**

SOURCE: Lamesa ISD individual school Monthly Claim Reports, October 2010.

The following fiscal impact portrays the potential of the type of funds the district can incur if the high school campus is closed and breakfast and lunch participation were to increase to 50 and 60 percent respectively. Currently, Lamesa High School is generating $428.04 in daily breakfast and lunch revenues, excluding a la carte sales. If breakfast participation is increased to 50 percent, and lunch participation is increased to 60 percent, the high school would generate $1,442.04 per day in breakfast and lunch revenues excluding a la carte sales, increasing daily revenue by $1,014.00. Additional expenses would include 38.37 percent for food, 0.24 percent for FSMC Indirect Costs, 11.26 percent for FSMC Direct Costs, 2.81 percent for FSMC Management Fee, 4.474 percent for FSMC Administrative Fee, 0.66 percent for district direct costs, and 34.55 percent for labor, totaling 92.63 percent in additional expenses ($1,335.76). This represents $142.87 in profit per day x 180 days x $142.87 per day = $25,716.60 additional profit per year.

However, if the district continues to allow students to leave campus during the lunch period, participation in the CNP will remain low.

Prior to making decisions regarding the expansion of universal breakfast at the secondary schools and closing the high school campus to help increase participation in breakfast and lunch, the district should conduct a cost benefit analysis regarding the impact of serving a universal breakfast at the secondary schools and closing the high school campus for lunch so more students participate in school lunches.

Finally, the district should enter into discussions with the FSMC to ensure they will be able to provide the additional services at the next contract renewal evolution. It is imperative that if these services are added in the future to a new contract, prior to awarding the contract, the district should request their attorney review the contract to ensure cost effectiveness of the new additions and if any needed performance measures need to also be built into the contract.

LISD has indicated to the review team that they "will study the feasibility of a universal breakfast program at the high school as well as closing the campus for lunch."

This recommendation can be implemented with existing resources.

EXHIBIT 9–18
CURRENT VERSUS PROJECTED REVENUE FOR LAMESA HIGH SCHOOL
OCTOBER 2010

LAMESA HIGH SCHOOL						
CURRENT BREAKFAST ADP						
	ADP PER DAY	**APPROVED**	**PERCENTAGE OF PARTICIPATION**	**REVENUE PER MEAL**	**DAILY REVENUE**	**DAILY REVENUE BY PROGRAM**
Free	67.80	303	22.38%	$1.76	$119.33	
Reduced-Price	5.00	47	10.64%	$1.76	$8.80	
Full-Price	3.90	234	1.67%	$1.26	$4.91	
					$133.04	$133.04
CURRENT LUNCH ADP						
	DAY	**APPROVED**	**PERCENTAGE OF PARTICIPATION**	**REVENUE PER MEAL**	**DAILY REVENUE**	
Free	73.85	303	24.37%	$3.00	$221.55	
Reduced-Price	10.30	47	21.91%	$3.00	$30.90	
Full-Price	16.75	234	7.16%	$2.54	$42.55	
				$295.00	$295.00	$295.00
Total Daily Revenue						**$428.04**
PROJECTED BREAKFAST AT 50 PERCENT ADP						
	ADP PER DAY	**APPROVED**	**PERCENTAGE OF PARTICIPATION**	**REVENUE PER MEAL**	**DAILY REVENUE**	**DAILY REVENUE BY PROGRAM**
Free	151.50	303	50.00%	$1.76	$266.64	
Reduced-Price	23.50	47	50.00%	$1.76	$41.36	
Full-Price	117.00	234	50.00%	$1.26	$147.42	
					$455.42	$455.42
PROJECTED LUNCH AT 60 PERCENT ADP						
	ADP PER DAY	**APPROVED**	**PERCENTAGE OF PARTICIPATION**	**REVENUE PER MEAL**	**DAILY REVENUE**	
Free	181.80	303	60.00%	$3.00	$545.40	
Reduced-Price	28.20	47	60.00%	$3.00	$84.60	
Full-Price	140.40	234	60.00%	$2.54	$356.62	
					$986.62	$986.62
Total Daily Revenue						**$1,442.04**

SOURCE: Lamesa ISD Monthly Claims Record, October 2010.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 9: CHILD NUTRITION SERVICES							
45. Cooperate with the Texas Department of Agriculture (TDA) regarding the recommendation of the Legislative Budget Board that TDA conduct an investigation of Lamesa ISD's child nutrition program under provisions of the US Code of Federal Regulations (CFR) Title 7 CFR 210.19(A)(1)(c)(vii) (5) regarding investigations which cites; "Each State agency shall promptly investigate complaints received or irregularities noted in connection with the operation of the Program, and shall take appropriate action to correct any irregularities."	$0	$0	$0	$0	$0	$0	$0
46. Review procedures for claiming federal reimbursement for elementary breakfasts.	($42,647)	($42,647)	($42,647)	($42,647)	($42,647)	($213,235)	$0
47. Establish an accurate Point-of-Service (POS) count of the breakfasts served and claimed for reimbursement.	$0	$0	$0	$0	$0	$0	$0
48. Meet Accuclaim onsite review deadlines.	$0	$0	$0	$0	$0	$0	$0
49. Ensure that a district employee reviews and signs all applications for free and reduced-priced meals to conform to the district's policy statement with TDA.	$0	$0	$0	$0	$0	$0	$0
50. Ensure that food service staff are following standardized recipes and maintaining accurate food production records.	$0	$0	$0	$0	$0	$0	$0
51. Monitor the system used for analyzing the nutrients in menus planned to meet the federal requirements for reimbursable meals served under the NSMP.	$0	$0	$0	$0	$0	$0	$0
52. Develop a process to monitor expiration dates of foods purchased and served in the child nutrition program.	$0	$0	$0	$0	$0	$0	$0
53. Establish a charge policy using a system that accommodates the concerns of principals, teachers, and parents.	$0	$0	$0	$0	$0	$0	$0
54. Implement Offer versus Serve at all schools, in all grade levels and conduct periodic waste studies.	$30,335	$30,335	$30,335	$30,335	$30,335	$151,675	$0

FISCAL IMPACT (CONTINUED)

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) SAVINGS	ONE TIME (COSTS) OR SAVINGS
55. Ensure that schools produce servings based on prior food production records.	$17,784	$17,784	$17,784	$17,784	$17,784	$88,920	$0
56. Monitor tray waste and participate in food tasting events to determine district food purchase preferences.	$0	$0	$0	$0	$0	$0	$0
57. Compare the food prices paid through the FSMC, to the prices paid by the members of the Regional Education Service Center XVII food service cooperative and other surrounding districts and consolidate and reconcile distributor invoices to validate direct food costs prior to paying FSMC monthly invoice.	$10,942	$10,942	$10,942	$10,942	$10,942	$54,710	$0
58. Consider raising adult and student full-price breakfast and lunch prices to ensure that the revenue generated is sufficient to cover the cost of preparing and serving the meals.	$34,666	$34,666	$34,666	$34,666	$34,666	$173,330	$0
59. Conduct a cost benefit analysis regarding the impact of serving a universal breakfast at the secondary schools and closing the high school campus for lunch so more students participate in school lunches.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 9	**$51,080**	**$51,080**	**$51,080**	**$51,080**	**$51,080**	**$255,400**	**$0**

CHAPTER 10

TRANSPORTATION

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 10. TRANSPORTATION

Transportation is a support service that requires sound management in order to transport students safely to and from school and other school-related activities. Transportation must be safe, reliable, and efficient, and comply with federal, state, and local regulations.

Lamesa Independent School District (LISD) is located about 62 miles south of Lubbock in Dawson County and encompasses 342.84 square miles. The district is largely rural and sparsely populated with the City of Lamesa as the major population center. The district's transportation fleet is comprised of 15 buses, four activity coaches, and one converted bus used for instrument transportation. Eight buses are used on transportation routes each school day, four are spares, and three are designated activity buses. A passenger van is used for the deaf education route to transport students to Lubbock.

In school year 2009–10, the district expended $497,119 on its transportation program and received an allotment of $82,745 from the state. The district maintains all records necessary to receive funding for the transportation program. The Maintenance and Transportation Director reports to the assistant superintendent of Finance and Operations and oversees transportation in LISD. The district employs nine bus drivers, three substitute drivers, and two mechanics. The mechanics also service the district's white fleet, which is comprised of 27 vehicles. Four of the nine bus drivers have additional duties in the district. All bus drivers received the required training.

The district has staggered bell times, and each route transports students in kindergarten through grade 12. The five LISD campuses are grade-level campuses with no attendance zones. To reduce the number of miles driven on routes, the district uses transfer locations, where the buses meet and exchange grade-level students and transport them to their campus. On average, LISD transported 307 regular program students and 20 special program students each day or 16.9 percent of students enrolled in school year 2009–10.

The fleet ran a total of 155,973 miles in school year 2009–10, including daily route service, extracurricular service, and other miles. Of the miles driven, 89,087 were for regular program and special program routes. LISD has the lowest mileage and is the second largest in area of the peer districts. **Exhibit 10–1** presents the route number, students and area served, total daily miles, daily drive time, and daily ridership for the transportation program.

LISD campuses are located in the western portion of the district in the City of Lamesa. The sparsely populated rural areas are to the north, east, and south of the city. The district is divided by US Highways 87 and 180 and State Highway 137, which intersect in the City of Lamesa. Although the

EXHIBIT 10–1
LAMESA ISD ROUTE INFORMATION
SCHOOL YEAR 2010–11

ROUTE NUMBER	STUDENTS AND AREA SERVED	TOTAL DAILY MILES	DAILY DRIVE TIME (HOURS)	DAILY RIDERSHIP
1-A	Regular In Town	16	2.00	22
1-B	Special Program In Town	10	2.25	70
1-C	Special Program Rural	82	4.25	11
7	Regular Rural and In Town	27	2.50	31
9	Regular Rural and In Town	87	3.50	69
10	Regular Rural and In Town	43	2.50	45
13	Regular Rural and In Town	45	3.25	90
14	Regular Rural and In Town	61	3.00	50
Van #62	Deaf Education to Lubbock	140	4.50	*

*Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34CFR Part 99 and Texas Education Agency procedures OP 10-03.
SOURCE: Lamesa ISD Transportation Department, February 2011.

majority of LISD students reside in the city, the majority of students transported live two or more miles from the campuses. The highways and major roads create a significant number of hazardous routes within the district, requiring that the district provide more bus transportation.

School districts are eligible to apply to the Texas Education Agency (TEA) for up to 10 percent of their regular transportation program allotment for students who would be subjected to hazardous conditions if they were to walk to school. Lamesa ISD has applied to TEA and been approved for hazardous route funding. Since LISD has a large number of hazardous conditions, they exceed the 10 percent limit. In order to provide safe transportation for 124 students in school year 2009–10, the district ran 1,046 miles for which it did not receive reimbursement. **Exhibit 10–2** displays the two-or-more mile service and the combined hazardous route service for regular program service for school years 2007–08 to 2009–10.

The location of the district in a sparsely populated region of the state requires a large number of extracurricular/co-curricular miles for the students to participate in various activities, such as competitive matches in other districts. Due to the length of extracurricular trips, the Maintenance and Transportation Director, mechanic, and substitute drivers drive routes or trips on a frequent basis. **Exhibit 10–3** presents the number of extracurricular/co-curricular miles for school years 2007–08 to 2009–10 for the regular and special programs.

ACCOMPLISHMENT

- LISD has implemented an incentive program to encourage employee attendance.

FINDINGS

- LISD does not have a parts inventory.
- LISD lacks a long-term bus replacement plan for the transportation fleet.

RECOMMENDATIONS

- **Recommendation 60: Ensure that an inventory is taken of all parts stored by the Transportation Department.**
- **Recommendation 61: Establish and implement a formal bus replacement schedule based on a 15-year cycle for the transportation fleet.**

DETAILED ACCOMPLISHMENT

ATTENDANCE INCENTIVE

LISD implemented an incentive program to encourage employee attendance. The incentive is calculated for both the fall and spring semesters. Drivers who are not absent more

EXHIBIT 10–2
LAMESA ISD MILEAGE REPORTS
SCHOOL YEARS 2007–08 TO 2009–10

	TWO-OR-MORE MILE SERVICE		COMBINED TWO-OR-MORE MILE AND HAZARDOUS AREA SERVICE	
SCHOOL YEAR	MILEAGE	AVERAGE DAILY RIDERSHIP	MILEAGE	AVERAGE DAILY RIDERSHIP
2007–08	48,356	142	51,613	206
2008–09	46,622	138	52,374	214
2009–10	44,055	183	49,507	307

SOURCE: Texas Education Agency, School Transportation Route Services Report, 2007–08, 2008–09, and 2009–10.

EXHIBIT 10–3
LAMESA ISD EXTRACURRICULAR/CO-CURRICULAR MILES
SCHOOL YEARS 2007–08 TO 2009–10

SCHOOL YEAR	REGULAR PROGRAM MILES	SPECIAL PROGRAM MILES	TOTAL MILES
2007–08	62,676	1,680	64,356
2008–09	67,802	1,379	69,181
2009–10	64,865	1,451	66,316

SOURCE: Texas Education Agency, School Transportation Operations Report, 2007–08, 2008–09 and 2009–10.

than two days per year are eligible to receive the incentive. The incentive is calculated as follows: A driver with zero absences receives $300 per year, with one absence receives $200 per year, and with two absences receives $100 per year. Part-time drivers receive half the amount of a full-time driver. The incentive is paid before the winter break and at the end of the school year. The Maintenance and Transportation Director and drivers reported that the incentive is a valuable tool to encourage attendance. For the fall of 2010, four drivers had zero absences and received $300, and three part-time drivers had zero absences and received $150. In summary, of the nine drivers, seven maintained perfect attendance.

DETAILED FINDINGS

PARTS INVENTORY (REC. 60)

LISD does not have a parts inventory. The Transportation Department has a variety of parts in stock needed for regular and daily repairs of the district's fleet, including tires, batteries, filters, and various other bus and vehicle parts. However, LISD does not maintain an inventory of parts in the department; nor does the district conduct a physical inventory during the year. The small parts inventory is kept in the upstairs storage area in the transportation building, the batteries are kept in the mechanics shop, and the tire inventory is kept in another building at the maintenance and transportation complex.

Many districts conduct an annual physical inventory of transportation parts and maintain inventory records to control parts inventories. Taking periodic physical inventories and reconciling inventory records to the physical counts is a sound business practice that helps establish accountability systems for the custody of items. By controlling parts inventories, districts are less vulnerable to pilferage and misappropriation of parts. Periodic inventories also help to identify unnecessary or obsolete parts for potential disposal.

The Maintenance and Transportation Director should ensure that an inventory is taken of all parts stored by the Transportation Department. This recommendation can be implemented with existing resources.

BUS REPLACEMENT SCHEDULE (REC. 61)

LISD lacks a long-term bus replacement plan for the transportation fleet. While the district budgets for one replacement bus each year, a plan is not in place for an ongoing needs assessment based on criteria such as age/mileage of vehicle, safety/efficiency/emissions standards, or changes in enrollment and transportation needs.

The LISD bus fleet ranges in age from 1995 model buses to 2011 model buses. The district has several buses of the same year model that are near the end of their life cycle. The National Association of State Directors of Pupil Transportation Services (NASDPTS) released a report on school bus replacement in January 2002 that states, "Establishing school bus replacement policies is an important activity, since it directly impacts the timeliness of introducing the latest safety, efficiency, and emissions improvements into the fleet." The report concludes that the anticipated lifetimes under normal operating conditions for large school buses is 12 to 15 years. However, the lifespan of a bus is also based on the number of miles driven. While higher annual mileage accumulation may be used as a criterion to shorten lifetimes of individual buses, the report says, lower than average annual mileage accumulation should not necessarily be a criterion to use buses for an extended number of years. **Exhibit 10–4** provides the bus number, year model, make, capacity, mileage and retirement or replacement year starting in school year 2010–11.

Bus purchases represent a significant expenditure of a district's resources, and a capital expenditure is often considered unwarranted when budget reductions are necessary. A replacement schedule based on an analysis of the fleet's age, mileage, and condition demonstrates the expenditure is critical to maintain the fleet. A replacement plan allows the district to budget for buses over a period of time and in predetermined budget cycles. Without a replacement plan, the district could face financial hardship when more than one bus in any one year needs to be replaced.

LISD should establish and implement a formal bus replacement schedule based on a 15-year cycle for the transportation fleet. This will allow the district to plan the budget for the replacement of buses over a period of time. Due to the district's existing budgeting policy, the funds to replace buses are already in the district's fund balance. Therefore, this recommendation can be implemented with existing resources.

EXHIBIT 10–4
LAMESA ISD TRANSPORTATION FLEET
REPLACEMENT YEAR STARTING IN SCHOOL YEAR 2010–11

BUS NUMBER	YEAR MODEL	MAKE	CAPACITY	MILEAGE	RETIREMENT OR REPLACEMENT YEAR
5	1995	GMC	22	128,481	2010
12	1995	International	71	168,384	2010
24	1995	International	71	146,788	2010
7	1995	International	0*	106,606	N/A
27	1997	International	71	171,672	2012
26	1997	International	71	136,739	2012
28	1997	Blue Bird	71	111,294	2012
13	2000	International	71	101,977	2015
14	2000	International	71	95,580	2015
21	2002	International	71	107,767	2017
19	2002	International	71	76,467	2017
25	2004	International	71	86,235	2019
8	2007	Blue Bird	71	55,174	2022
6	2008	Blue Bird	71	24,048	2023
9	2010	International	71	20,227	2025
10	2010	International	71	18,484	2025
1	2011	Blue Bird	46	6,732	N/A
2	2011	Blue Bird	46	6,769	N/A
3	2011	Blue Bird	46	6,777	N/A
4	2011	Blue Bird	46	4,833	N/A

* Bus for transporting band instruments; no capacity for students.
SOURCE: Lamesa ISD Transportation Department, February 2011.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 10: TRANSPORTATION							
60. Ensure that an inventory is taken of all parts stored by the Transportation Department.	$0	$0	$0	$0	$0	$0	$0
61. Establish and implement a formal bus replacement schedule based on a 15-year cycle for the transportation fleet.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 10	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 11

COMPUTERS AND TECHNOLOGY

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 11. COMPUTERS AND TECHNOLOGY

The Lamesa Independent School District (LISD) Technology Department supports instructional learning and administrative functions. The district uses the Regional Service Center Computer Cooperative (RSCCC) system supported by Regional Education Service Center XVII (Region 17) located in Lubbock for the financial system and uses Skyward administrative software to manage and store information pertaining to student data management.

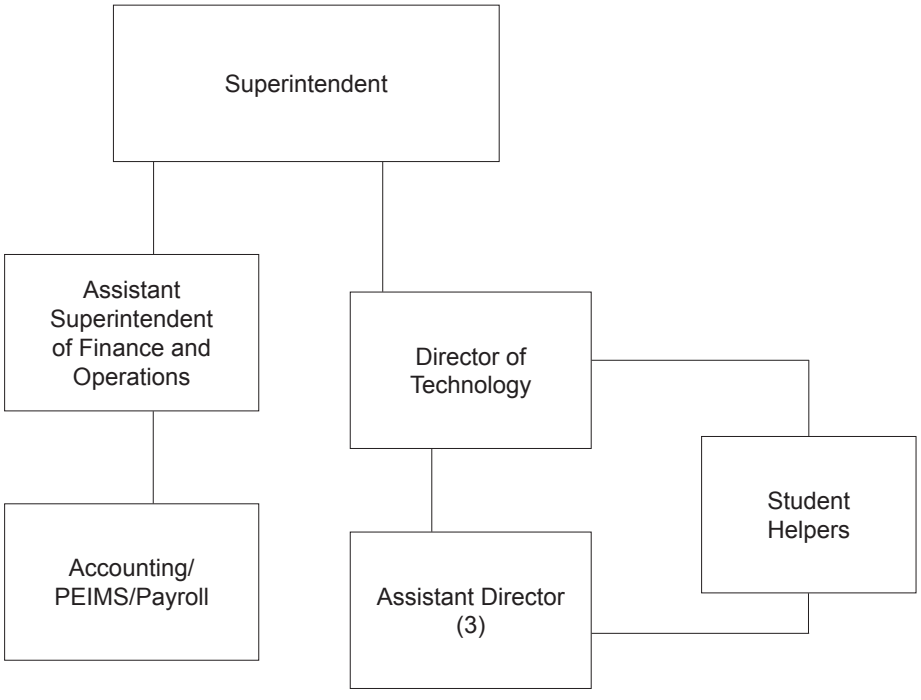
The department is led by a director of Technology who reports to the superintendent. The director is supported by three assistant directors of Technology. Part-time student helpers assigned to the department assist with work orders, which include installing software and the setup of computers and printers. Additionally, the student helpers have assisted in cabling facilities and trenching to install buried cable on district grounds.

LISD has a full-time position of Public Education Information Management System (PEIMS) Coordinator with responsibility to coordinate the submission of student-related data to the Texas Education Agency (TEA) through PEIMS. The PEIMS Coordinator reports to the assistant superintendent of Finance and Operations.

Exhibit 11–1 displays the LISD Technology and PEIMS organization for school year 2010–11.

The Technology Department is responsible for developing and maintaining the computer-based information systems for administration, curriculum instruction, and assistive technology for Special Education. Technology staff members

EXHIBIT 11-1
LAMESA ISD TECHNOLOGY AND PEIMS ORGANIZATION
SCHOOL YEAR 2010–11



SOURCE: Lamesa ID Technology Department Organization Chart, February 2011; Interview with director of Technology, February 2011.

design and maintain the network infrastructure, which includes electronic mail, software applications, and computer equipment and peripherals. The department oversees a network which connects 10 district facilities either by wire cable or wireless and independent phone systems.

In addition, the department handles software and hardware purchases throughout the district to ensure compatibility with the existing infrastructure and classroom needs.

The district's technology budget for school year 2010–11 is shown in **Exhibit 11–2**.

EXHIBIT 11-2
LAMESA ISD TECHNOLOGY BUDGET
SCHOOL YEAR 2010–11

KEY AREA	AMOUNT
Salaries/ Benefits - staff and student helpers	$239,989.00
Contracted Services	$40,607.00
Supplies/Software	$94,212.00
Fiber Optic Project	$167,000.00
Other Operating Expenses	$3,494.00
Current Technology Expenditures	$545,301.00
Technology Plan Expenditures	$306,700.00
Number of Students	1,924
Average per Student based on current expenditures	$283.27

SOURCE: Lamesa ISD Budget Department and Technology Plan 2010.

ACCOMPLISHMENTS

- LISD has a responsive Technology Department that designs, installs, and maintains the network infrastructure with the assistance of a help desk that addresses problems on a timely basis and provides efficient tracking and monitoring of technology-related requests.
- LISD has implemented a range of effective policy and procedures to ensure accuracy of state PEIMS submissions.

FINDINGS

- LISD's Technology Department has organizational issues, including inefficient reporting and decision-making structures, the absence of job descriptions or annual evaluations, and the lack of backup training for completing responsibilities in key positions.
- LISD is not providing all of the information it should on its district's website.
- LISD's Technology Department lacks an instructional technology specialist position to coordinate technology training and integrate technology into the curriculum.
- LISD's Long-Range Technology Plan was developed without the active participation of all members of the district's Technology Committee, is outdated, and not linked to the District Improvement Plan (DIP).
- LISD's Technology Department lacks documented standards, policies, and procedures for technology-related operations.
- LISD does not effectively use the E-Rate discount program.
- LISD lacks a disaster preparedness and recovery plan for service restoration of mission-critical technology services in case of a site disaster.

RECOMMENDATIONS

- **Recommendation 62: Establish clearly defined department/district reporting and decision-making structures and identify backup roles for assistants.**
- **Recommendation 63: Improve the district's website.**
- **Recommendation 64: Create an instructional technology specialist position with responsibilities for technology training and integration of technology into the curriculum.**
- **Recommendation 65: Create an active and engaged Technology Committee to develop a three-to five-year long-range technology plan.**
- **Recommendation 66: Develop and publish technology-related standards, policies, and procedures.**
- **Recommendation 67: Develop a plan to manage the E-rate discount funding at the district level.**
- **Recommendation 68: Develop and implement a comprehensive disaster preparedness and recovery plan that would allow the district to**

maintain operations in the event the network is compromised and rendered inoperable.

DETAILED ACCOMPLISHMENTS

RESPONSIVE TO DISTRICT NEEDS

LISD has a responsive Technology Department that designs, installs, and maintains the network infrastructure with the assistance of a help desk that addresses problems on a timely basis and provides efficient tracking and monitoring of technology-related requests. The Technology Department provides a variety of services that support the instructional needs of students. The department designed its network and installed the infrastructure to support it. Additionally, the department installs all hardware and software used in the district. By doing in-house work of cabling, trenching, and connecting fiber optics, the technology staff has saved the district costs associated with infrastructure setup.

In interviews, the responsiveness of the Technology Department was identified as a strong point. Most widely cited was the addition of the help desk for district users. The district's help desk, Spiceworks—an Information Technology (IT) tool—includes applications management, network monitoring, inventory control, and a ticketing system. This IT tool allows staff members to create work-order tickets in the system in a user-friendly manner. A priority level is set by the user for the reported problem, and the ticket is posted for review by a Technology Department staff member. The software identifies who created the ticket, the location and machine number or address, creation date, close date, status, days open, and summary of the problem.

Technology Department staff have administrative access to the software and are able to self-assign a ticket as needed. All technology-related requests are tracked and served on an established priority basis. An analysis of the 129 tickets reviewed from January 3, 2011 through February 18, 2011 shows that 56 percent of the tickets were addressed within 24 hours of assignment. The district's ability to consistently deliver quality customer support indicates employee proficiency and ability to resolve complex issues.

The help desk software helps distribute the workload for technical support. Technology staff members respond quickly to reported problems. The system's reports provide a valuable management tool to monitor network performance, maintain historical data on problematic equipment, and examine the performance of Technology staff members.

PEIMS PROCEDURES

LISD has implemented a range of effective policies and procedures to ensure accuracy of state PEIMS submissions. A key strategy is the district's employment of a full-time PEIMS coordinator who provides a high level of organization and oversight to reduce the number of errors in state submissions. Further, LISD has in place districtwide PEIMS procedures and training for campus staff, special programs personnel, the business office, and the personnel office.

The PEIMS coordinator collects student data at the district level, gathers special programs lists from counselors and campus secretaries, supplies the needed information to assist in update coding for all programs, gives directions on how to print reports, and monitors PEIMS submissions. Prior to submitting PEIMS data, critical information must be assembled from three sources. The PEIMS coordinator assembles the student information from SKYWARD software, the head bookkeeper collects the financial information from RSCCC software, and the personnel clerk gathers personnel information from SKYWARD software. The PEIMS coordinator constantly monitors the major categories of data collected for submission, which include organization data, program participation, budget data, school leaver data, actual financial data, student attendance, staff data, course completion, and student demographic discipline data.

The district provides staff development to campus principals and secretaries in PEIMS data collection/reporting and conducts weekly monitoring of campus enrollment reports, leaver reports, and discipline reports, allowing staff to make timely corrections. The PEIMS coordinator requires a signature signoff on all printed reports by a campus administrator. In submitting PEIMS data to TEA, LISD uses the services of Region 17. The district has been recognized by TEA for an error rate of zero percent on reports.

DETAILED FINDINGS

ORGANIZATION OF TECHNOLOGY DEPARTMENT (REC. 62)

LISD's Technology Department has organizational issues, including inefficient reporting and decision-making structures, the absence of job descriptions or annual evaluations, and the lack of backup training for completing responsibilities in key positions. In the district organization structure, the director of Technology reports to the superintendent, but in reality, technology-related responsibilities and decision-making have become split

between the superintendent, the assistant superintendent of Finance and Operations, and other Central Office staff. An interview with the director of Technology reflected unclear lines of communication and reporting relationships. This lack of clarity could cause confusion and inefficient handling of many important technology-related decisions. For example, if a new server was needed with a three-day turnaround to replace a crashed server at a campus, the director of Technology's request for approval of the purchase from the superintendent would have to be forwarded to the assistant superintendent of Finance and Operations for a budget check, resulting in a critical time loss. Furthermore, interviews with technology management staff indicated that major technology decisions, including technology related budgets, were made by Central Office staff, including the superintendent, assistant superintendent of Finance and Operations, assistant superintendent of Personnel, and director of Curriculum and Federal Programs, without the input of the director of Technology.

A lack of job descriptions for Technology Department staff, as well as no annual evaluation procedure, further contribute to a disconnect between district management and the Technology Department. Technology staff members learn their job responsibilities as on-the-job-training. Interviews with the staff indicate that each day they review the work orders and take care of the technology needs of the district. Any training received by the Technology Department staff has been limited and their knowledge base has been cultivated through hands-on assignments. The director of Technology functions as a network administrator 80 percent of the time leaving only 20 percent for administrative functions. The assistant directors are performing technical duties not actually 'directing'. No information or documents were available as to when the last evaluations were conducted.

Another organizational issue concerns the Technology Department's lack of backup training for key administrative positions. For example, the current director of Technology alone maintains support of the network infrastructure and critical passwords. Though the department has implemented cross-training from time to time, this method is not enough to compensate if the director left the department or was otherwise unable to perform his/her assigned duties. The result would be that the district network infrastructure would be vulnerable. Additionally, the backup roles of the three assistant directors are not clearly defined by job descriptions.

The district should establish clearly defined department/district reporting and decision-making structures and identify backup roles for assistants. To address these issues, LISD should have the director of Technology report directly to the assistant superintendent of Finance and Operations to support more efficient decision-making and to assist the Technology Department in both identifying the operational needs of the district and in providing more direct input on department-related budgeting and financial issues. The superintendent indicated in an interview that a reporting relationship change was already under consideration.

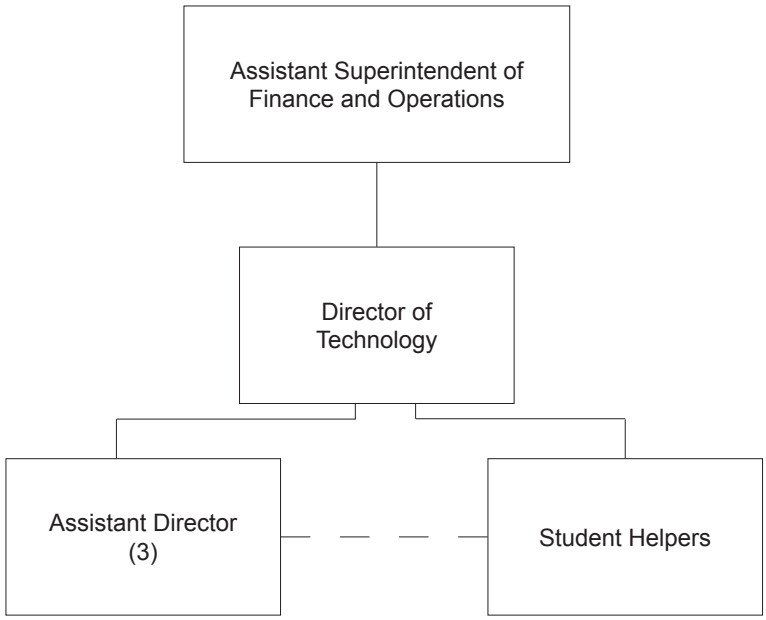
Exhibit 11–3 displays the proposed LISD Technology Department organizational structure.

The director of Technology should work closely with the assistant superintendent of Personnel to develop the job description for each staff member in the department, including the student helpers. Input from the assistant directors will assist in identifying roles and responsibilities. Job titles in the department should reflect the assigned tasks for the position. The job descriptions should clearly identify the reporting structure, roles, responsibilities, knowledge, skills, experience, certifications, competencies, employment status, salary range, key performance objectives and an indicator value, safety/work environment (working conditions, mental, physical and environmental factors), and physical demands. By having a job description, an evaluation instrument can be designed and constructive feedback can then be provided to the workers in the department.

In addition, scheduled training should be developed to include rotational cross-training assignments, train-the-trainer, outside staff development, and online certification, all of which will enable the staff to become proficient in different positions.

This recommendation can be implemented through additional online training. For example, DELL Corporation offers DELL Education Training and Certification classes at a beginning cost of $200 per technology staff member yearly. All technology staff members are eligible and the yearly cost to the district would be approximately $800 (4 staff x $200 per staff member). The web based training is designed to teach participants basic DELL desktop, laptop, and server troubleshooting techniques. DELL's IT Training and Online Self Dispatch (DOSD) Certification allows access to DELL technical knowledge through web training and support tools which facilitates self-diagnosis of hardware related issues. By having DOSD status, technology staff could order online and track the shipment of the replacement parts and schedule installation. Apple also has a similar program, Apple's Self-

EXHIBIT 11-3
PROPOSED LAMESA ISD TECHNOLOGY DEPARTMENT OGRANIZATIONAL CHART



SOURCE: Interview with Director of Technology, February 2011, and best practices identified by the Review Team, March 2011.

Servicing Account (SSA) program, which is designed for institutions and businesses that want the convenience of repairing their own products.

DISTRICT WEBSITE (REC. 63)

LISD is not providing all of the information it should on its district's website. LISD's website is not consistent with the Texas Education Code (TEC), Texas Government Code, and Update 12 of TEA's Financial Accountability System Resource Guide rules, laws, and regulations. In addition, staff dedicated to site updates and maintenance support is extremely limited.

A part-time student helper assigned to the Technology Department is the webmaster. Due to time constraints and lack of coordination, the current approach for updating the website is to wait for content to be submitted. There is no specific individual at each campus assigned to collect and submit current webpage updates for campus information to the Technology Department. There are inconsistencies in district, campus, and department webpages. As a result, the website lacks important or useful information for users, includes inactive links and outdated content, and does not include required material. For example, the Lamesa Middle School webpage featured an early dismissal date that was outdated. Examples of missing material and consistency issues include Board of Trustee meeting minutes for December 7, 2010; December 14, 2010; January 14, 2011; and January 18, 2011. In addition, districts are required by TEC to post on their websites the most recent Academic Excellence Indicator System (AEIS) Reports for the district and campuses, and the last year for which AEIS reports are posted currently is school year 2007–08. Further, TEC requires the following:

- information contained in the most recent campus report card for each campus in the district;
- the information contained in the most recent performance report for the district;
- the most recent accreditation status and performance rating of the district; and
- definition and explanation of each accreditation status.

Exhibit 11–4 reflects the required and optional Internet postings for a school district's website.

A well structured, user-friendly, and up-to-date website provides the community with valuable information and highlights a district priority on communication and transparency. The passive approach of waiting to receive content and only posting limited information results in lost opportunities to engage and inform the community, publicize the district's successes, and increase parental communication and involvement.

Seminole ISD has a well constructed, user-friendly, colorful, and up-to-date website that is inviting to student, staff, faculty, and community members. Some of the features of the Seminole website are:

- Welcome message and the district mission statement;
- Translations of the website in Spanish and German;
- Quick links menu for bond update, scholarships, and sports gallery;
- After school program information;
- Feature events;
- Public relations;
- Parents and students link;
- Staff and faculty link;
- Public Notices; and
- Main drop down menus for:
  - Calendars;
  - Campuses;
  - Departments;
  - Board of Trustees; and
  - Employment and community.

Other school district websites that provide good examples of required and optional content are: Tahoka ISD, Dawson ISD, Fabens ISD, Sterling City ISD, Boerne ISD, Galena Park ISD, Northside ISD, San Elizario ISD, and Ysleta ISD.

LISD should improve the district's website. The director of Technology reported that the district is looking at a template-based solution for improving its website. In planning for improvements, LISD should consider the standardization of both campus and district web pages and an organizational hierarchy that provides better site navigation. Since the onsite visit, LISD has made changes to the district's website and has begun to address the required postings.

Ideally, the district would obtain the services of a professional webmaster with school district web design experience to setup the templates and be responsible for the design and management of the district's website. A less expensive alternative than contracting with an outside provider would be to train one of the existing assistant directors of Technology as the district webmaster.

A district webmaster would establish standards, maintain the website templates, maintain security, and ensure timely updates of the district website and campus web pages. The webmaster would be responsible for training district staff and campus web page content providers on updating procedures.

The cost for training one of the existing assistant directors of Technology as the district webmaster is approximately $650 per class for a website design and development training class online through a vendor. One such vendor that offers online courses is the University of Phoenix, which provides a number of courses related to web design: Management Information Systems, Fundamentals of Programming with Algorithms and Logic, Image Editing and Implementation, Introduction to Web Design I and II, and Web Systems which are under the umbrella of an Associate of Arts in Information Technology. In order to have a good foundation of web design, a staff member should consider taking a minimum of two courses related to web design, if not pursuing an Associates of Arts or a Bachelor of Science. The two courses would have a one-time cost of approximately $1,300 ($650 x 2 courses).

INSTRUCTIONAL TECHNOLOGY (REC. 64)

LISD's Technology Department lacks an instructional technology specialist position to coordinate technology training and integrate technology into the curriculum. The lack of such a position to promote technology could hinder LISD's Curriculum Management Plan 2006–2011, which indicates a priority emphasis on offering electives in technology by fall 2011. The Curriculum Management Plan states that the roles and responsibilities of each stakeholder are defined in Lamesa ISD Board Policy EG (LOCAL). A review of Board Policy EG (LOCAL) makes no mention of technology integration or the staff members responsible for the integration of technology.

EXHIBIT 11-4
INTERNET POSTINGS ON A SCHOOL DISTRICT WEBSITE

POSTING	SECTION	RULE, LAW, REGULATION	REQUIRED OR OPTIONAL	NOTES
ACADEMIC				
College Credit Programs	28.010(b)	Texas Education Code	Optional	Availability of college credit courses
Electronic Courses	29.909(f) see 30.A	Texas Education Code	Required	Requirement for ISD's participating in program to post "informed choice" report conforming to Commissioner's format for course descriptions, materials, Texas Essential Knowledge and Skills (TEKS) linkage and other information
Dates PSAT/NMSQT and any college advanced placement tests will be administered and provided instructions for participation by a home-schooled pupil	29.916	Texas Education Code	Required	House Bill 1844, 80th Leg., Regular Session
Campus Improvement Plans	7.3.7 State Compensatory Education Audit	Update 14 Financial Accountability System Resource Guide	Required	
District Improvement Plan	7.3.7 State Compensatory Education Audit	Update 14 Financial Accountability System Resource Guide	Required	
ADMINISTRATIVE				
Targeted Improvement Plan	39.106(e-1)(2)	Texas Education Code	Required	Post prior to Board of Trustees Hearing on targeted improvement plan
Group Health Coverage Plan and Rpt	22.004(d)	Texas Education Code	Required	Annual report submitted to TRS and copy of plan
AEIS Report, School Report Card, Performance Rating of District, Definitions and Explanation of Each Performance Rating Described by Education Code 39.072(a)	39.362	Texas Education Code	Required	Notice of Performance – Not later than the 10th day after the first day of instruction of each school year
Posting of Vacancies	11.163(d)	Texas Education Code	Required	Post vacant position for which a certificate or license is required
Board of Trustee's Employment Policies	21.204(a)-(d)	Texas Education Code	Required	Term Contracts
Conflicts Disclosure Statements and Questionnaires	176.009	Texas Local Government Code	Required	Disclosure
Superintendent's Contract	109.1005(e)(2)(D)	Title 19, Texas Administrative Code	Required	The school district is to provide a copy of the superintendent's contract EITHER as a disclosure in the financial management report OR by posting the contract on the district's Internet Site.
Notice of Corrective Action	6316 (c) (10)	Title 20 U.S. Code	Required	NCLB-related requirement

EXHIBIT 11-4 (CONTINUED)
INTERNET POSTINGS ON A SCHOOL DISTRICT WEBSITE

POSTING	SECTION	RULE, LAW, REGULATION	REQUIRED OR OPTIONAL	NOTES
Reverse Auction Procedure	2155.062(d)	Texas Government Code	Required	Required if real-time bidding process or bidding with use of an Internet location
Notice of Board of Trustees Meetings	551.056	Texas Government Code	Required	
Agenda for Board of Trustees Meetings	551.056	Texas Government Code	Required	Required if the board meeting notice does not include the agenda and the district contains all or part of the area within the corporate boundaries of a municipality with a population of 48,000 or more
FINANCE				
Bill of rights for property owners whose property may be acquired by governmental or private entities through the use of eminent domain authority	402.031& 21.0112	Texas Government Code	Required	Statement required either by first-class mail or available on website
Costs and metered amount for Electricity, Water, and Natural Gas for District	2265.001(b)	Texas Government Code	Required	Renumbered from 2264.001 by 81st Legislature, Regular Session
Proposed Maintenance and Operations Tax Rate	26.05(b)	Texas Tax Code	Required	Include on home page of website; Required if tax rate will raise more taxes than prior year or if tax rate exceeds effective maintenance and operations tax rate
Summary of Proposed Budget	44.0041	Texas Education Code	Required	Budget summary must include per student and aggregate spending and a comparison to the previous year's actual spending
Post Adopted Budget	39.084	Texas Education Code	Required	Required to maintain the adopted budget on the district's website until the third anniversary of the date the budget was adopted
Annual Financial and Compliance Report	7.3.6	Update 14 Financial Accountability System Resource Guide	Required	Publication of audited financial information in a newspaper or on website
Evaluation of State Compensatory Education	7.3.7 State Compensatory Education Audit	Update 14 Financial Accountability System Resource Guide	Required	Audited financial information (annual financial and compliance report) in newspaper or website
HEALTH				
Physical Activity Policies	28.004(k)	Texas Education Code	Required	Physical Activity policy by campus level, health advisory council information, vending machine and food service guidelines, and penalties for tobacco product use

EXHIBIT 11-4 (CONTINUED)
INTERNET POSTINGS ON A SCHOOL DISTRICT WEBSITE

POSTING	SECTION	RULE, LAW, REGULATION	REQUIRED OR OPTIONAL	NOTES
Immunization Awareness Program	38.019	Texas Education Code	Required	Post in English and Spanish: a list of immunization requirements and recommendations, a list of health clinics in the district that offer influenza vaccine, and a link to the Department of State Health Services Internet website providing procedures for claiming an exemption from requirements

SOURCE: Texas Association of School Business Officials (TASBO), October 2009; Review Team review of TEC and TEA, Update 14 Financial Accountability System Resource Guide.

The district has made a significant investment in recent years to improve its technology infrastructure, including the purchase of needed equipment and software to support technology integration in classrooms. Internet access is available districtwide. The district has numerous computer labs and individual workstations for students, teacher and administrative use. Peripherals such as Promethean Interactive Whiteboards®, printers, and projectors are available in core classrooms. In addition, the district has made a range of software applications available for teachers and staff. **Exhibit 11–5** shows the number of computer labs and the number of workstations available to students, teachers, and administration at district campuses.

In order to make technology integration successful, districts should promote and provide staff development on new pedagogical and technological practices. Site visits to LISD campuses and interviews with the director of Technology indicated that teachers may not be fully using existing technology. For example, the director of Technology estimated usage of the Promethean Interactive Whiteboards®, which are connected to teacher workstations, at around 50 percent. A walk-through on each campus showed that about half of the teachers had the Promethean Interactive Whiteboards® in use.

Teachers should be familiar with the Technology Application standards for all educators, and additional staff development in the area of curriculum integration can be beneficial. Part of a teacher's annual appraisal is Domain II: Learner-Centered Instruction of TEA's Professional Development and Appraisal System which measures a teacher's use of technology during an observation.

Educators should revisit their roles as new technology trends become a part of the classroom environment. As new trends such as mobile technology, the abundance of resources accessible via the Internet, and game-based learning become part of the educational environment, staff development is critical. Technology and Curriculum Departments will also need to be involved in the new curriculum development approach as districts integrate the latest proposed revisions to TAC Chapter 126 of the Texas Essential Knowledge and Skills (TEKS) for Technology Applications into the curriculum.

EXHIBIT 11-5
NUMBER OF COMPUTER LABS AND WORKSTATIONS PER LAMESA ISD CAMPUS
SCHOOL YEAR 2010–11

CAMPUS	NUMBER OF COMPUTER LABS	STUDENT WORKSTATIONS	TEACHER WORKSTATIONS	ADMINISTRATIVE WORKSTATIONS
High School	7	218	58	13
Middle School	5	158	48	11
North Elementary	2	102	38	9
South Elementary	3	181	36	8
TOTAL	**17**	**659**	**180**	**41**
Student Ratio		2.92		

SOURCE: Lamesa ISD Technology Department, February 2011.

Analysis of the district's School Technology and Readiness (STaR) Charts supports these conclusions. TEA developed the STaR for use by campuses and districts in evaluating their progress of integrating technology into the curriculum in alignment with the goals of the State Board of Education's (SBOE) *Long-Range Plan for Technology, 2006–2020*. The four components of the STaR Chart are: Teaching and Learning; Educator Preparation and Development; Leadership, Administration, and Instructional Support; and Infrastructure for Technology. Each component has four levels of progress: Early Tech, Developing Tech, Advanced Tech, and Target Tech. **Exhibit 11–6** displays the key components, focus areas, and scoring within each component.

Annually teachers in the district complete a STaR chart survey to produce the campus ratings. **Exhibit 11–7** shows a summary of LISD's school year 2009–10 ratings by campus, with both the rating for level of progress and the actual score provided in each of the components**.**

A comparison of campus progress indicates that Educator Preparation and Development has not moved beyond Developing Tech (13), while Infrastructure for Technology is rated at Advanced Tech (16). LISD's STaR chart ratings are within the present state averages, but some campuses fall short of reaching the goal of Advanced Tech, and no campus has reached the goal of Target Tech.

Instructional technology specialists can help with technology integration by being assigned the following duties:

- coordinating districtwide technology training;
- assisting in the development of a districtwide policy that defines technology proficiency levels for teachers;
- facilitating the purchase of instructional software for schools;
- collaborating with the Technology Department to ensure that district and campus networks satisfy instructional needs;
- advising campuses regarding effective technology integration strategies;

EXHIBIT 11-6
TEXAS CAMPUS STAR CHART COMPONENT, FOCUS AREAS, AND SCORING

COMPONENT	FOCUS AREAS	SCORES DEPICTING LEVELS OF PROGRESS
Teaching and Learning	Patterns of classroom use Frequency/design of instructional setting using digital content Content area connections Technology Applications TEKS implementation Student mastery of technology applications (TEKS) Online learning	Early Tech (6–8 points) Developing Tech (9–14 points) Advanced Tech (15–20 points) Target Tech (21–24 points)
Educator Preparation and Development	Professional development experiences Models of professional development Capabilities of educators Technology professional development participation Levels of understanding & patterns of use Capabilities of educators with online learning	Early Tech (6–8 points) Developing Tech (9–14 points) Advanced Tech (15–20 points) Target Tech (21–24 points)
Leadership, Administration, and Instructional Support	Leadership and vision Planning Instructional support Communication and collaboration Budget Leadership and support for online learning	Early Tech (6–8 points) Developing Tech (9–14 points) Advanced Tech (15–20 points) Target Tech (21–24 points)
Infrastructure for Technology	Students per computers Internet access connectivity/speed Other classroom technology Technical support Local Area Network/Wide Area Network Distance Learning Capability	Early Tech (6–8 points) Developing Tech (9–14 points) Advanced Tech (15–20 points) Target Tech (21–24 points)

SOURCE: Texas Education Agency, Campus STaR Chart, spring 2010.

EXHIBIT 11-7
LAMESA ISD SUMMARY STaR CHART RATINGS BY CAMPUS
SCHOOL YEAR 2009–10

CAMPUS	TEACHING AND LEARNING	EDUCATOR PREPARATION AND DEVELOPMENT	LEADERSHIP, ADMINISTRATION, AND INSTRUCTIONAL SUPPORT	INFRASTRUCTURE FOR TECHNOLOGY
South Elementary	Advanced Tech (15)	Developing Tech (12)	Advanced Tech (20)	Advanced Tech (18)
North Elementary	Advanced Tech (18)	Advanced Tech (16)	Advanced Tech (20)	Advanced Tech (19)
Middle School	Advanced Tech (15)	Developing Tech (13)	Developing Tech (12)	Developing Tech (13)
Success Academy	Developing Tech (12)	Developing Tech (12)	Developing Tech (12)	Developing Tech (12)
High School	Developing Tech (14)	Developing Tech (14)	Advanced Tech (18)	Advanced Tech (18)
LISD Average	**Advanced Tech (15)**	**Developing Tech (13)**	**Advanced Tech (16)**	**Advanced Tech (16)**
State Average	***Developing Tech (14)***	***Developing Tech (13)***	***Advanced Tech (15)***	***Advanced Tech (16)***

SOURCE: Lamesa ISD Campus Summary STaR Chart Report, 2009–10; TEA, STaR Chart State Summary Statistics, 2009–10.

- serving as the primary instruction technology support representative for the Technology Committee;
- coordinating districtwide teacher technology training;
- tracking effectiveness of technology integration;
- reviewing online testing requirements;
- ensuring standards and training requirements are met by district staff; and
- providing expert advice on classroom uses of technology that includes Web 2.0 tools.

Further, an instructional technologist could support the district in increasing use of Project Share and other online staff development and content resources. Project Share is an eLearning portal provided by a collaborative made up of TEA, Epsilen LLC, and The New York Times Company. Project Share provides a digital learning environment in which teachers and students can communicate, collaborate, and access 21st century digital content. Through Project Share, teachers will have access to online professional development modules, professional learning communities, and digital content repositories. Access to the platform is available at no cost to Texas school districts. Project Share is now available to students on a selected basis. A current pilot project is also investigating the feasibility of having high school students build ePortfolios through this platform.

The first state-adopted online instructional materials, which can be accessed by all Texas public high school teachers, are now available through Project Share. An instructional technology specialist would be able to work closely with Region 17 and the district to help teachers and students take advantage of this interactive learning environment.

Finally, an instructional technology specialist in the district could ensure that technology integration aligns with standards from the field such as the State Board for Educator Certification (SBEC) in Technology Applications and the International Society for Technology in Education's (ISTE) National Educational Technology Standards (NETS) for students, teachers, and administrators.

The district should create an instructional technology specialist position with responsibilities for technology training and integration of technology into the curriculum. The fact that the district has made technology available and that only half of the teachers may be utilizing technology tools justifies the creation of an instructional technology specialist position. Equipment standing idle or underused indicates that additional training and monitoring could be beneficial. An instructional technology specialist would also serve a key role in support of curriculum integration during the district's curriculum development process, including an enhanced ability to identify quality technology tools, resources, and software applications that promote digital literacy.

The position of instructional technology specialist is a blend of a teacher and a technology specialist. The most common elements in a job description for an instructional technology specialist include:

- Education and Background:
  - Four-year teaching degree;
  - Experience in the classroom;

- Experience in planning, organizing, delivering, and evaluating instruction;;
- Communicate information in different formats; and
- Use of technology tools.

- Knowledge of:
  - Curriculum-based instruction;
  - NETS for student, teachers, and administrators;
  - TEKS for grades Early Childhood (EC) through 12;
  - SBOE requirement in Technology Applications;
  - Curriculum integration strategies;
  - Emerging technology tools in the classroom; and
  - Ethical practices and Internet safety.
- Duties:
  - Integrates technology into the classroom;
  - Develops technology curriculum;
  - Selects technology-oriented learning tools for the classroom;
  - Train teachers and administrators in classroom technology skills; and
  - Deliver online or web-based training.

The recommended position would be assigned to report to the director of Curriculum and Federal Programs but work closely with the director of Technology. The estimated yearly rate for an instructional technology specialist is $65,278, based on a salary of $55,000 plus benefits of $5,514 (10.025% x $55,000) and health and life insurance of $4,764.

LONG-RANGE TECHNOLOGY PLAN (REC. 65)

LISD's Long-Range Technology Plan was developed without active participation by all members of the district's Technology Committee, is outdated, and not linked to the District Improvement Plan (DIP). The existing technology plan was developed by a former administrator in October 2008 with little or no input from the director of Technology and members of the Technology Committee, which consisted of four teachers, the director of Technology, and the Curriculum and Federal Programs administrator, and the plan has not been reviewed or updated since 2008. Without a comprehensive technology plan that is updated annually and linked to the DIP, the district could be making technology decisions that are not in line with district improvement goals and objectives. At the same time, without alignment, the DIP may not effectively promote technology integration in the district.

The district's technology plan must include expectations for student and teacher use of technologies that are correlated to the curriculum TEKS that address the four areas of the state's *Long-Range Plan for Technology, 2006–2020*. The state's plan focuses on promoting academic excellence for all learners and building a technology infrastructure aligned with the following goals:

- Goal 1 - Teaching and Learning;
- Goal 2 - Educator Preparation and Development;
- Goal 3 - Leadership, Administration, and Instructional Support; and
- Goal 4 - Infrastructure for Technology.

Exhibit 11–8 shows LISD's Technology Plan for school years 2008–09 to 2010–11 by goal and objectives.

Districts can review the latest national and state technology plans. The *National Education Technology Plan 2010,* the *Long-Range Plan for Technology 2006–2020*, and the *2010 Progress Report on the Long-Range Plan for Technology* are available online. Best practices stress that an updated plan should:

- incorporate need assessment findings which must include an analysis of the latest STaR charts (teachers and campuses) and e-Learning training, a review of technology inventory and network infrastructure, and a review of technology related budgets;
- integrate the needs of learners, educators, leaders in areas such as online testing requirements, and mobile devices;
- promote academic excellence for all learners, all educators, and all leaders;
- acknowledge policies that ensure privacy, information protection, and ethical standards;
- promote e-Learning technology for all users 24/7 by incorporating Project Share for teachers and eligble students;

EXHIBIT 11-8
LAMESA ISD TECHNOLOGY PLAN, GOALS AND OBJECTIVES
SCHOOL YEARS 2008–09 TO 2010–11

GOAL	OBJECTIVE
Goal 1 (Teaching and Learning) Lamesa ISD will maximize student achievement through improved teaching and learning in technology.	Objective 1.1 – Teachers work to improve academic achievement, including technology literacy, through cooperative strategic planning with other faculty/staff members, parents, students, and community stakeholders, and the implementation of those strategies developed. Objective 1.2 – The district will strive to improve student achievement, especially those students with special needs, by coordinating education technology funds and programs with other funds, such as: Title I, Part A; Title I, Part C; State Bilingual Funds; State Compensatory Education Funds, State Gifted/Talented Funds, and Special Education Funds.
Goal 2 (Educator Preparation and Development) Lamesa ISD will maximize student achievement through ongoing, sustained and intensive, high quality staff development in current and emerging technologies and their applications.	Objective 2.1 – Develop a comprehensive technology training plan for all teachers and staff. Objective 2.2 – Teachers, principals, administrators, school library media personnel, and other appropriate staff will work towards vertical alignment of the Technology Applications TEKS and implement them in the classroom and/or library media center. Objective 2.3 – Teachers, principals, administrators, school library media personnel, and other appropriate staff will strive to integrate Technology Applications into other areas of TEKS.
Goal 3 (Leadership, Administration, and Support) Lamesa ISD will maximize student achievement through improved administration and support services of technologies utilized within the district.	Objective 3.1 – Improve hardware/software in-house support services for all stakeholders. Objective 3.2 – Include planning for technology integration to improve student achievement, including participation in the comprehensive state technology system, in all classroom, library, campus, and district planning processes.
Goal 4 (Infrastructure for Technology) Lamesa ISD will maximize student achievement through the maintenance and improvement of the infrastructure for technology, including the upgrading of the existing infrastructure and the addition of emerging technologies.	Objective 4.1 – Strive to maintain/improve the 1:1 teacher/workstation ratio and the 4:1 student/workstation ration, as well as the high-speed support infrastructure. Objective 4.2 – Add appropriate emerging technology, such as web-integrated software and hardware (scanners, digital imaging, etc.) to instruction and curricula, including the upgrading and addition of course offerings in technology applications.

SOURCE: Lamesa ISD Technology Plan, school years 2008–09 to 2010–11.

- mention technology competencies for both teachers and students;
- require training for students, staff, and parents regarding:
  - Children's Internet Protection Act (CIPA) that address concerns about access to offensive content over the Internet on school and library computers;
  - Science/Technology/Engineering/Mathematics (STEM) learning; and
- mention the use interoperability standards for financial data and student data to enable data-driven decision-making.

Districts develop technology plans using state standards and technology plan goals and align the plans with their DIP goals, objectives, strategies, activities, timelines, funding, and responsibility assignments. For example, Strategy 1.N in the district's current DIP states, "Improve and expand technology implementation and integration of technology into the TEKS-based curriculum." A new and aligned district technology could have as its Goal 1: "Lamesa ISD will increase technology integration in the classroom by 25 percent each school year at all grade levels to maximize student achievement." The technology plan could further describe the strategies and resources that would be applied toward that goal, and how progress toward these goals could be measured.

District projected expenditures in the Technology Plan from school years 2008–09 to 2010–11 reflects approximately $854,205. The major budget item was Infrastructure for Technology (district and campus technology capabilities); followed by Educator Preparation and Development (staff development); Leadership, Administration, and Instructional

Support (backing from administration); and Teaching and Learning (learner access). **Exhibit 11–9** summarizes the planned technology expenditures for the three-year period by goal.

EXHIBIT 11-9
LAMESA ISD TECHNOLOGY PLAN
PLANNED EXPENDITURES BY GOAL
SCHOOL YEARS 2008–09 TO 2010–11

GOAL	BUDGET	PERCENT
Infrastructure for Technology	$358,766	42%
Educator Preparation and Development	$222,093	26%
Leadership, Administration, and Instructional Support	$162,299	19%
Teaching and Learning	$111,047	13%
TOTAL	**$854,205**	**100%**

SOURCE: Lamesa ISD Technology Plan, school years 2008–09 to 2010–11.

Each goal has specific activities that are measured as levels of progress:

- Infrastructure for Technology:
  - Students per classroom computers;
  - Internet access and connectivity speed;
  - Classroom technology;
  - Technical support;
  - Local area network and wide area network; and
  - Distance Learning Capacity.
- Educator Preparation and Development:
  - Professional development experiences;
  - Models of professional development;
  - Capabilities of educators;
  - Technology professional development participation;
  - Levels of understanding and patterns of use; and
  - Capabilities of educators with online learning.
- Leadership, Administration and Instructional Support:
  - Leadership and vision;
  - Planning;
  - Instructional support;
  - Communication and collaboration;
  - Budget; and
  - Leadership and support for online learning.
- Teaching and Learning:
  - Patterns of classroom use;
  - Frequency/design of instructional setting using digital content;
  - Content area connections;
  - Technology Applications TEKS implementation; and
  - Student mastery of technology applications.

An important piece in technology planning is being able to project expenditures as shown in **Exhibit 11–9** and then be able to budget expenditures by looking at sources of funding. Districts should clearly identify in their planning efforts what source of funding will be used for different expenditures. A review of the tracking expenditures and funding for technology planning should be a joint exercise of key administrative staff, such as the assistant superintendent of Finance and Operations, director of Curriculum and Federal Programs, and the director of Technology.

Exhibit 11–10 provides an overview of the funding sources by type of expenditure for the three-year period.

A review of LISD expenditures and sources of funding shows disjointed planning. For example, E-rate funds have not been received over the three year period and that funding expenditure should have been adjusted in the technology plan in 2009. Also, 100 percent of anticipated E-rate funding should be used for technology expenditures. **Exhibit 11–10** shows E-rate funds only being used at 80 percent.

There is a disparity of $174,725 between the three-year annual projection for Goal-Educator Preparation and Development in **Exhibit 11–9** ($222,093) and three-year funding dedicated for Type of Expenditure – Staff Development in **Exhibit 11–10** ($47,368). It appears that only 5.6 percent, rather than 26 percent, of $854,205 of total planned expenditures is being spent on staff development.

In **Exhibit 11–10**, in the source of funding column, the district's state technology allotment funding (St. Tech Funds)

EXHIBIT 11-10
LAMESA ISD LONG RANGE TECHNOLOGY PLAN, PLANNED FUNDING BY TYPE OF EXPENDITURE
SCHOOL YEARS 2008–09 TO 2010–11

TYPE OF EXPENDITURE	2008–09	2009–10	2010–11	TOTAL	SOURCE OF FUNDING
Staff Development	$11,368	$16,000	$20,000	$47,368	Title II, Part D (35%) St. Tech. Funds (50%) Local Funds (15%)
Telecommunications and Internet Access	23,700	23,700	23,7000	$71,100	E-Rate (80%) St. Tech Funds (20%)
Materials and Supplies	60,693	65,000	65,000	$190,693	Title II, Part D (10%) St. Tech Funds (60%) Local Funds (30%)
Equipment	121,386	130,000	150,000	$401,386	Title II, Part D (10%) St. Tech Funds (45%) Title I, Part A (15%) St. Comp. Ed. (15%) Migrant (5%) BE/ESL St. Funding (5%) G/T Funding (5%)
Maintenance	20,231	20,000	20,000	$60,231	Title II, Part D (10%) St. Tech Funds (70%) Local Funds (20%)
Miscellaneous Expenses	27,427	28,000	28,000	$83,427	Title II, Part D (20%) St. Tech Funds (60%) Local Funds (30%)
TOTAL	**$264,805**	**$282,700**	**$306,700**	**$854,205**	

SOURCE: Lamesa ISD Technology Plan, school years 2008–09 to 2010–11.

is being allocated for a total of 305 percent (staff development 50 percent + telecommunication and internet access 20 percent + materials and supplies 60 percent + equipment 45 percent + maintenance 70 percent + miscellaneous 60 percent). This is equivalent to $152,040. The district's budget worksheet for technology allotment indicates $50,653 for 2010–11. This is $101,387 in excess of what is projected to be received from the state technology fund allotment.

Comprehensive technology plans include goals, action plans, timelines, performance and success measures, designated staff responsible for implementing and monitoring the goal, project milestones, and financial allocations. Well-written technology plans lay the foundation for effective planning and decision-making and guide a district toward achieving its stated goals. Complete technology plans draw information from a needs assessment that includes a basic inventory, budget planning, supportive environment for technology use, employee resource allocations, student and staff proficiency levels in technology, and technology purchases.

Ysleta ISD's technology master plan is comprehensive and details their needs assessment along with explicit goals and timelines for incorporating technology into learning and lesson plans, incorporating student usage of technology tools, technology competency and literacy requirements, professional development, administrative technology, and technology replacement strategies. Seminole ISD, Levelland ISD, Boerne ISD, and Galena Park ISD technology plans incorporate proficiency standards along with professional development.

Exhibit 11–11 provides an overview and comparison of components of a comprehensive technology plan with LISD's Long-Range Technology Plan.

The district should create an active and engaged Technology Committee to develop a three- to five-year long-range technology plan. The technology plan should include all of the TEA required components necessary to make it an effective management tool. Development of the district's Technology Plan should start immediately and should include the following activities:

- Expanding the Technology Plan Committee membership to include teacher representatives from each campus, a librarian, special needs specialist,

EXHIBIT 11-11
TECHNOLOGY PLAN COMPONENTS

TECHNOLOGY PLAN COMPONENT	INCLUDED IN LAMESA ISD'S PLAN
District Profile – includes district information such as number of campuses, student enrollment, technology budget, current technology infrastructure, and technology planning committee	Yes
Executive Summary – overview of plan that should include technology planning committee organization, vision, and goal statements	Yes
Review of technology status, needs assessment	Partial
Equity issues and assistive technology	Yes
Instructional uses of technology	Yes
Student technology standards	No
Staff technology standards	No
Integration into core curriculum	Partial
Pilot program and action research	No
Management uses of technology	Partial
Technology infrastructure standards to include network standards	No
Budget projections and funding sources	Yes
Current hardware inventory and inventory control issues	No
Hardware standards and purchase	No
Staff training programs	Partial
Security planning	No
Current software inventory	No
Software standards and purchases	No
Technology literacy and professional development requirements	No
Technology replacement cycles	No

SOURCE: Technology Planning and E-Rate Support Center (TPESC), Educational Service Center 12, February 2011; National Center for Education Statistics, Technology in Schools, 2003; and best practices identified by the Review Team in the research literature, February 2011.

district administration, campus administration, curriculum specialist, students, parent, and community member. The committee should be required to meet twice annually to review progress in accomplishing the goals of the plan and update the plan yearly;

- Perform needs assessment of both the administrative, teacher, and student systems for upgrade or replacement requirements. Interoperability is critical;
- Review funding and adjust budgets;
- Update technology-related standards, policies, and procedures;
- Review the DIP to determine how technology can support its defined goals and adjust strategies;
- Review infrastructure upgrades to assist in achieving the state's recommended student-to-computer ratio of 1:1; and
- Review instructional technology applications for effectiveness.

This recommendation can be implemented with existing resources.

STANDARDS, POLICIES, AND PROCEDURES (REC. 66)

LISD's Technology Department lacks documented standards, policies, and procedures for technology-related operations. The Technology Department has not developed standards, policies, or procedures for technology operations throughout the district. Interviews with all district technology staff confirmed that a set of procedures are followed, but there is not written documentation of these procedures. Technology staff members have learned their job functions by word of

mouth, following unwritten procedures, and on-the-job-training.

In an April 2003 publication, *Helping Schools Make Technology Work*, the Texas Comptroller of Public Accounts wrote: "Unwritten rules are simply no substitute for clearly outlined procedures. Districts need clear policies and procedures for the purchase of technology, its acceptable use, the application of copyright laws, and the control of software and hardware inventories. The district will find it hard to defend itself against criticism when an employee acts outside of an unwritten rule —there is little proof that the individual was acting without express authority."

Written procedures are the backbone of technology operations. Technology Department guidelines can be used for reference and training purposes. Standard operating procedures (SOP) provide department managers with a system to update or replace information pertaining to a procedure.

Exhibit 11–12 provides a list of common technology-related standards, policies, and procedures and identifies whether or not they exist in LISD.

Fabens ISD's Technology Department has provided a SOP document on their website. It has specific procedures for passwords, e-mail, remote management, equipment repurposing, equipment disposal, equipment checkout, helpdesk, and hardware and software.

LISD should develop and publish technology-related standards, policies, and procedures. SOPs set out the most basic instructions and serve as a reference point for information about steps in a specific procedure to be followed by people involved in a specific technology process. SOPs document plans, protocols, instructions, regulations, and policies. SOPs filters the requirements contained in these documents into a format that can be used by staff members in their work environment and should be written with care. Technology staff members should be involved in the process of developing the SOPs which focus on procedures for tasks that are critical to the department. The writing process should be coordinated by the director of Technology and all important steps of each procedure should be described in detail. In preparing SOPs, best practice research mentions the following:

- Introduction
  - Overview
  - Purpose
  - Benefits
  - Format (easy to read)
- SOP Process
  - Scope and applicability
  - Summarize procedure
  - Definition, (identifying any acronyms, abbreviations, or specialized terms used)
  - Identify safety issues
  - Personnel responsibilities
  - Equipment and supplies
  - Review (SOP should remain current)
  - Approval process
  - Revision frequency
  - Checklists
  - Document control number
- References

On a yearly basis, the district should review and update the SOPs. This recommendation can be implemented with existing resources.

E-RATE (REC. 67)

LISD does not effectively use the E-rate discount program. The lack of oversight of a consultant hired by the district has resulted in LISD filing for eligible E-Rate funding but not receiving any funds.

E-rate is the commonly used name for the Schools and Libraries Division (SLD) of the Universal Service Fund, which is administered by the Universal Service Administrative Company (USAC) under the direction of the Federal Communications Commission (FCC). The program provides discounts to assist most schools and libraries in the United States in obtaining affordable telecommunications and Internet access. The SLD supports connectivity—the conduit or pipeline for communications using telecommunications services and/or the Internet.

E-rate funding requests fall under four categories of service: telecommunications services, Internet access, internal connections, and basic maintenance of internal connections. Discounts for support depend on the level of poverty and the urban/rural status of the population served. Discounts range

EXHIBIT 11-12
LIST OF TECHNOLOGY-RELATED STANDARDS, POLICIES, AND PROCEDURES

TECHNOLOGY AREA	POLICY NAME	AVAILABILITY	EXISTS AT LAMESA ISD
Department	Standard Operating Procedures (SOPs)	Administration and Department	No
Acceptable Use	Internet Acceptable Use Policy (AUP)	Handbooks and website	Partial – in handbooks, but website link inactive
	E-mail and messaging	Handbooks and website	No
	Internet safety policy	Handbooks and website	Partial
	Printer standard	Website	No
	Telephone services	Handbooks and website	No
	Copyright policy	Handbooks and website	Partial – in handbooks, but not on website
	Mobile device policy	Handbooks and website	Partial – in Student Handbook
	Website policy	Website	No
Security	Anti-Virus policy	Department use only	No
	Firewall policy	Department use only	No
	Remote Access policy and agreement	Department use only	No
	Password policy	Department use only	No
	Third-party access policy	Department use only	No
Help Desk	Technology Department support policy	Handbooks and website	No
Applications	Software installation standard	Department use only	No
Servers	Server configuration standard	Department use only	No
Asset Management	Purchasing policy: hardware and software	Website	No
	Desktop move/add/change standard	Department use only	No
	Hardware standard	Website	No
	Asset disposal policy	Website	No
	Sign-out procedures for take home equipment	Handbooks and website	No
	Inventory policy	Handbooks and website	Partial – in Business Procedures Manual
	Replacement standard: hardware	Website	No
	Update standard: software	Website	No
Technology Standards	Infrastructure	Department use only	No

SOURCE: Review Team identification of best practices from the research literature, March 2011.

from 20 percent to 90 percent of the costs of eligible services. The level of discount is based on the percentage of students eligible for participation in the National School Lunch Program or other federally approved alternative mechanisms.

Applicants must provide additional resources including computers, telephones, software, professional development, and the other elements that are necessary to use the connectivity funded by the SLD.

An analysis of LISD's participation in E-rate funding indicates that the district has not received any E-rate funding for 2008, 2009, or 2010, even though funding requests have been filed. **Exhibit 11–13** shows LISD's E-rate participation and disbursement for school years 2008–09 to 2010–11.

Review of the E-rate documents indicates LISD has been using a consulting firm to handle the filing of E-rate documents. Oversight of this process has not been successful, and the school district has not received funding. The

EXHIBIT 11-13
LAMESA ISD E-RATE PARTICIPATION AND FUNDING DISBURSEMENT
SCHOOL YEARS 2008–09 TO 2010–11

SCHOOL YEAR	REQUESTED FUNDING	FUNDED REQUESTS	REQUESTED AMOUNT	TOTAL DISBURSED
2010–11	5	0	$125,179.40	$0.00
2009–10	4	0	$45,762.50	$0.00
2008–09	4	0	$45,762.50	$0.00
TOTAL	**13**	**0**	**$216,704.40**	**$0.00**

SOURCE: Regional Education Service Center XII (Region 12), Technology Planning and E-Rate Support Center, February 2011.

consulting firm is preparing and filing E-rate forms for $7,500 yearly, and the district is responsible for gathering the required information for the documents, the technology plan, obtaining the original invoices for all eligible services, identifying locations for services, and submitting requests for proposal (RFP) and competitive bidding.

The district should develop a plan to manage the E-rate discount funding at the district level. The school district should diligently monitor the E-rate process for funding cycle 14 and then manage the process for cycle 15, which will begin in July 2011 (2012–13). This alternative will give time for the director of Technology and an alternate to receive training, assess the technology needs of the district, direct the drafting of an updated technology plan, have the technology plan approved, and be able to file E-rate forms in a timely manner. Assistance is available through Region 17 and Region 12. Region 12 is the E-rate support center for schools and libraries in Texas on training and other services on the E-rate filing process.

The district should be eligible for at least a 70 percent districtwide discount for technology funding, based on the National School Lunch Program. LISD has applied for only Internet access and telecommunication services for 2008 through 2010 and should investigate opportunities to file for internal connections and basic maintenance of internal connections.

Additionally, the director of Technology should investigate the possibility of recovering $216,704.40 of undisbursed funding from past annual E-rate requests by contacting the SLD to see if there is an appeals process. The first step in the investigation should be contacting the previous and current E-Rate consultants and requesting all the documents related to funding years 2008 through 2010. The second step would be to review the documents and verify the timelines for each funding year. The next step would be to call the SLD directly and ask if the district has any options for filing an appeal. The last step would be to submit an appeal to the SLD if the window is still open for an appeal. Each funding year will have a set timeline for the appeal process. Correspondence received from the SLD is time sensitive and must be handled in a timely manner.

The district could save the annual cost of $7,500 related to contracting to a consultant for E-rate forms processing. The district could possibly recover requested E-rate funds from school years 2008–09 to 2010–11. Additionally, with proper planning and filing, the district could conservatively expect to receive approximately $75,000 annually from E-rate funding, for an estimated annual savings of $82,500 ($75,000 + $7,500). To be conservative, the fiscal impact does not assume recovery of the $216,704 in requested E-rate funding for prior years.

DISASTER PREPAREDNESS AND RECOVERY PLAN (REC. 68)

LISD lacks a disaster preparedness and recovery plan for service restoration of mission-critical technology services in case of a site disaster. Without a comprehensive disaster preparedness and recovery plan, the district is at risk of losing critical data and operations in the event of an unforeseen disaster.

A backup or the process of backing up refers to making copies of data on an exact schedule. Backups have two distinct purposes. The primary purpose is to recover data as a reaction to data loss, be it by data deletion or corrupted data. The secondary purpose of backups is to recover data from a historical period of time within the constraints of a user-defined data retention policy, typically configured within a backup application for how long copies of data are required.

LISD has an undated electronic backup policy, but the actual occurrence of a backup appears to be user-dependent. According to the director of Technology, backups are completed daily to critical systems under his purview and are saved via the district's intranet to various servers throughout

the district**.** There are no offsite storage arrangements or rotation patterns, and it was not clear whether the backups were full or partial. The procedures, as addressed in the electronic backup policy provided by the district, are not being followed. Specifically, daily backup procedures and a minimum of seven removable media devices and weekly backup procedures with a minimum of three removable media devices are not occurring. LISD has what appears to be an unstructured repository which may simply be a stack of USB memory sticks, CD-R/DVD-R media or hard drive space with minimal information about what was backed up and when. An unstructured repository is the least likely method to achieve a high level of recoverability.

Library systems at each campus are backed up by the librarian or library aide. During onsite visits by the review team to the campus facilities, the verification of library software backups found inconsistencies in current policy. Staff responses to queries about backup status/procedures ranged from "No, not yet" to "Yes, to a jump drive."

Backup procedures and policies assist in building a comprehensive disaster recovery/business continuity plan. Districts are susceptible to a number of specific hazards: fire, flooding, hazardous materials, high winds, power interruptions/surges, severe thunderstorms, tornados, and winter storms. The possible consequences could lead to prohibited access, disrupted power, ruptured gas main, downed power lines, water damage, smoke damage, chemical damage, and potential total loss.

The purpose of disaster preparedness and recovery plans is to provide a road map of predetermined actions that will reduce decision-making time during data recovery operations and ensure resumption of critical services at the earliest possible time in the most cost-effective manner. Plans also establish, organize, and document risk assessments, responsibilities, policies and procedures, and agreements and understandings for internal and external entities. **Exhibit 11–14** lists the key elements of a disaster recovery plan.

A sample disaster plan, Abilene Christian University (ACU) Technology Disaster Preparedness and Recovery Plan, updated February 2007, is available for viewing on ACU's website. Though ACU's Technology Disaster Preparedness and Recovery Plan has a likeness to the CoSN disaster recovery elements in **Exhibit 11–14**, it does have some other key features. Key features of the plan are:

- Plan lists incidents requiring action and the specific circumstances under which the plan will be invoked;
- Plan covers strategies for both partial and full recovery;

EXHIBIT 11-14
KEY ELEMENTS OF A DISASTER RECOVERY PLAN

STEP	DETAILS
Develop format of the Disaster Recovery Plan.	Easy to understand and follow Organized into sections Detailed steps of tasks to be accomplished Multiple formats for different audiences Print and electronic
Identify and classify services, operations and records.	Vital Important Non-essential
Secure and restore data.	Sound backup system based on priorities Electronic and paper backup of vital records (and plan) Offsite backups and data storage Offsite office/redundant data center Remote data replication and outsourcing
Review capabilities of providers.	Affirm that your data is safe and secure. Test the provider's backup and disaster recovery plan.
Identify resources needed and redundancies.	Hardware Software Communications Facilities People Other resources

EXHIBIT 11-14 (CONTINUED)
KEY ELMENTS OF A DISASTER RECOVERY PLAN

STEP	DETAILS
Determine hardware needed and redundancies.	Identify all required hardware. Be sure to include resources required to run and maintain hardware. Regularly update you list. Maintain key documents offsite.
Determine software needed and redundancies.	Identify all required software. Regularly update the list. Keep copies of key applications offsite. Maintain key documents offsite. Be certain your backup systems are reliable and redundant.
Identify backups and data recovery and inherent risks.	Backup plan-full, incremental and differential Offsite backups Remote data replication
Identify communications needed and redundancies.	Assume all existing communication vehicles are unavailable. Determine what information will need to go out. Determine how information will be communicated to key response and recovery staff and to all stakeholders.
Determine facilities needed and redundancies.	Consider requirements for IT recovery site. Consider requirement for other necessary office space.
Determine people needed and redundancies.	Who is qualified to manage tasks? Have they been trained? What is their prior experience? Ensure key people resources are backed up.
Identify incident response team and chain of command.	Identify critical personnel. Communicate roles and responsibilities. Ensure personnel have authority needed. Be certain everyone knows who is in charge. Provide initial and ongoing training.
Provide resources for your people.	Transportation Shelter Food and water Supplies Security
Develop a staged shutdown.	Move from simple preparedness to ceasing operations. Protect assets while staff is available to do the work. Ensure that mission-critical operations are the last to be stopped. Ensure shutdown can be reversed if needed.
Coordinate with partners.	Technology providers Consultants Local emergency preparedness agencies

SOURCE: Consortium for School Networking (CoSN), 2011.

- Plan looks at the physical safeguards of each computer site that houses telecommunications equipment room and the centralized computing equipment; and
- Plan mentions the insurance considerations of all major hardware.

Two school districts, Canutillo ISD and Fabens ISD, also have made Disaster Recovery Plan and Resumption Planning documents available on their websites.

LISD should develop and implement a comprehensive disaster preparedness and recovery plan that would allow the district to maintain operations in the event the network is compromised and rendered inoperable. The strategy for a districtwide information backup and contingency plan is important because the process affects virtually every area of the district.

Best practices reference eight steps that should be considered by the director of Technology in formulating the process of

implementing a disaster recovery plan and resumption planning document:

- Step 1 - Organize a disaster recovery planning team:
  - Create a group consisting of members that represent all functions of the organization.
- Step 2 - Assess the risk of the district:
  - Identify the scope;
  - Define objectives; and
  - Define constraints.
- Step 3 - Establish roles across the campuses and departments:
  - Planning team determines the role each campus, department and external party must play in disaster recovery; and
  - Planning team must contact local authorities, emergency services, law enforcement, public utilities, etc. to determine their roles.
- Step 4 - Develop policies and procedures:
  - Procedures are the step-by-step methods; and
  - Policies are the guidelines.
- Step 5 - Document disaster recovery procedures:
  - Policy and procedures must be documented and sent through the proper channels for approval.
- Step 6 - Prepare to handle disasters:
  - Get the information out, make staff, faculty, and local authorities, etc. aware, and ensure they all know the plan.
- Step 7 - Train, test, and rehearse.
- Step 8 - Management:
  - Assess threats and recovery procedures;
  - Monitor laws, political climate, and social conditions; and
  - Document all changes and provide updated training.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

	RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 11: COMPUTERS AND TECHNOLOGY								
62.	Establish clearly defined department / district reporting and decision-making structures and identify backup roles for assistants.	($800)	($800)	($800)	($800)	($800)	($4,000)	$0
63.	Improve the district's website.	$0	$0	$0	$0	$0	$0	($1,300)
64.	Create an instructional technology specialist position with responsibilities for technology training and integration of technology into the curriculum.	($65,278)	($65,278)	($65,278)	($65,278)	($65,278)	($326,390)	$0
65.	Create an active and engaged Technology Committee to develop a three-to five-year long-range technology plan.	$0	$0	$0	$0	$0	$0	$0
66.	Develop and publish technology-related standards, policies, and procedures.	$0	$0	$0	$0	$0	$0	$0
67.	Develop a plan to manage the E-rate discount funding at the district level.	$82,500	$82,500	$82,500	$82,500	$82,500	$412,500	$0
68.	Develop and implement a comprehensive disaster preparedness and recovery plan that would allow the district to maintain operations in the event the network is compromised and rendered inoperable.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 11		**$16,422**	**$16,422**	**$16,422**	**$16,422**	**$16,422**	**$82,110**	**($1,300)**

CHAPTER 12

SAFETY AND SECURITY

LAMESA INDEPENDENT SCHOOL DISTRICT

CHAPTER 12. SAFETY AND SECURITY

School districts are responsible for providing a safe and secure learning environment for students, faculty, and staff. Safe and secure schools require identifying threats and vulnerabilities, developing plans to minimize risk, and then implementing the plans. A balanced approach of prevention, intervention, enforcement, and recovery is essential to providing effective safety and security programs.

Safety and security in schools go hand-in-hand. The role of school facilities operators has changed in recent years. The traditional role was to provide safe environments through fire protection, communication systems, crisis management/ disaster planning, cleanliness, playground safety, and overall building and grounds safety. Today, school facilities maintenance staff is also concerned with the implementation of numerous environmental regulations governing school facilities and verification of compliance with the regulations. This also includes environmental regulations related to indoor air quality, mold, asbestos, water management, and waste management.

Securing school facilities refers to ensuring the physical security of both the schools and its occupants and requires a comprehensive approach to planning. At a minimum, school facilities planners should consider the following elements:

- school locking systems;
- monitoring systems/closed-circuit television (CCTV) cameras;
- equipment and asset protection;
- visibility of areas and grounds;
- police/school resource officers; and
- emergency operations planning.

Lamesa Independent School District (LISD) has developed both formal and informal safety and security policies and plans that incorporate reasonable elements of prevention, intervention, and enforcement. A sample of the policies and procedures include: student codes of conduct, dress codes, visitor policies, periodic safety inspections, drug prevention programs, and informal drug and driving educational programs. The district also operates a Disciplinary Alternative Education Program (DAEP) at the Lamesa Success Academy and In-School Suspension Programs (ISS).

In school year 2010–11, LISD contracted a school resource officer (SRO) for 10 months out of the year from the Lamesa Police Department (LPD). The SRO reports directly to the assistant superintendent of Personnel and works closely with the school principals and assistant principals across the district's campuses, as well as other officers with the LPD. The SRO is the primary person responsible for safety and security in the district.

The SRO helps prepare incident reports for the school administration. **Exhibit 12–1** presents a summary of the incidents that occurred in the district during school year 2009–10.

EXHIBIT 12-1
LAMESA ISD SUMMARY OF INCIDENTS
SCHOOL YEAR 2009–10

INCIDENT TYPE	NUMBER OF INCIDENTS	PERCENT INCIDENT RATE
Violation of Code of Conduct	1,032	70.1
Violation of Code of Conduct (in AEP)	300	20.4
Fighting/Mutual Combat	111	7.5
Possession of Controlled Substance	22	1.5
Possession of Alcoholic Beverage	*	*
Conduct Off Campus	*	*
Used/Possessed Firearm	*	*
Used, Exhibited, Possessed Illegal Drugs	*	*
TOTAL	**1,473**	**100.0**

*Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34CFR Part 99 and Texas Education Agency procedures OP 10-03.
SOURCE: Lamesa ISD SRO Incident Reports, 2009–10 Summer Collection.

The district has a documented code of conduct for both elementary and secondary students. The code defines acceptable and unacceptable student behavior. A progressive discipline policy that sets different levels of punishment for various levels of misbehavior is used. The district provides

ISS for students with minor disciplinary problems. For more serious offenses, the district sends students to the DAEP in the Alternate School. The most serious offenses lead to out-of-school suspension and eventually expulsion. A summary of the disciplinary actions taken for the incidents listed above is displayed in **Exhibit 12–2**.

EXHIBIT 12-2
LAMESA ISD BEHAVIOR MANAGEMENT SUMMARY
SCHOOL YEAR 2009–10

DISCIPLINARY ACTION	OCCURRENCES	PERCENT OCCURENCE
In-School Suspension (ISS)	1,024	61.4
Partial Day ISS	7	0.4
Disciplinary Alternative Education Program (DAEP)	143	8.6
Out-of-School Suspension	403	24.2
Expulsion	*	*
Truancy Fine	90	5.4

*Numbers less than five have not been cite4d due to the Family Educational Rights and Privacy Act (FERPA) 34CFR Part 99 and Texas Education Agency procedures OP 10-03.
SOURCE: Lamesa ISD SRO Incident Reports, 2009–10 Summer Collection.

Disciplinary actions can be appealed through a documented due process in place for students. The *Student Discipline and Hearing Officer Bootcamp Guidelines* were prepared by Schwartz and Eichelbaum, attorneys for LISD. Training on discipline management for administrators has been provided in the past.

The district also employs a truancy officer to follow up with truant students. The truancy officer works closely with the SRO to follow up on any actions that are required. A summary of the truancy rates by school for LISD in school year 2009–10 is presented in **Exhibit 12–3**.

During interviews with school staff and administrators, the review team noted concerns regarding the culture or atmosphere in the schools. Some examples of concerns included a lack of respect between students, poor dress code, and bullying. The high number of incidents regarding violations of the school code of conduct has some administrators concerned. Some believe that the migration of students from LISD to neighboring school districts is directly related to this issue or is at least a contributing factor to students leaving the district while their families continue residency in Lamesa.

EXHIBIT 12-3
LAMESA ISD TRUANCY SUMMARY
SCHOOL YEAR 2009–10

CAMPUS	ENROLLMENT	TRUANCY
South Elementary	608	38
North Elementary	464	*
Middle School	409	8
High School	437	42

*Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34CFR Part 99 and Texas Education Agency procedures OP 10-03.
SOURCE: Lamesa ISD SRO Incident Reports, 2009–10 Summer Collection.

The hiring of an SRO has already begun to modify student behavior. Formalizing policies related to behavior management, anti-bullying programs, student mediators, and positive behavioral support (PBS) systems can make a substantial positive impact on school safety and learning environments. Support from the SRO in helping to educate teachers, staff, and students should also be a focus.

ACCOMPLISHMENT

- LISD hired a School Resource Officer (SRO) to support safety and security efforts at all campuses across the district in school year 2010–11.

FINDINGS

- LISD has engaged in limited efforts devoted to safety and security planning.
- LISD has limited and outdated documentation of safety and security policies, procedures, and training.
- While LISD has closed-circuit television (CCTV) cameras in place at most schools, the district lacks adequate coverage at all campuses.
- LISD lacks effective and consistent visitor controls and school access procedures at all campuses.
- LISD has no specific budget for security or safety training and limited self-funded training by the School Resource Officer (SRO) to meet minimum training requirements.
- LISD lacks a plan for coordinating safety and security programs with the School Resource Officer (SRO).

RECOMMENDATIONS

- **Recommendation 69: Update outdated safety plans and the emergency operations plan to meet current standards and requirements.**
- **Recommendation 70: Update safety and security policies and procedures.**
- **Recommendation 71: Conduct a cost benefit analysis of investing in additional closed-circuit television (CCTV) cameras to increase coverage in the district.**
- **Recommendation 72: Finalize and make consistent the varying systems for teacher and visitor sign-in.**
- **Recommendation 73: Establish a specific budget for security and safety training.**
- **Recommendation 74: Enhance the current safety and security programs.**

DETAILED ACCOMPLISHMENT

SCHOOL RESOURCE OFFICER SUPPORT

LISD hired a School Resource Officer (SRO) to support safety and security efforts at all campuses across the district in school year 2010–11. The SRO is employed full-time by the Lamesa Police Department (LPD) and contracted by LISD 10 months out of the year. While the SRO reports directly to the assistant superintendent of Personnel, the position works very closely with the principals and assistant principals at each of the schools. The addition of the SRO already appears to have made a substantial difference in reducing in-school incidents and enhancing the overall environment with respect to safety, security, and conduct.

The SRO is based at Lamesa High School and is onsite at LISD campuses most of the time between 7:45 AM and 5:00 PM. The SRO maintains an office at the high school and also tours the schools to help provide an appearance of greater presence. Much of the SRO's time is spent at the high school and middle school. Time spent at the elementary schools is used primarily to build a level of trust and confidence with the younger students.

Primary responsibilities of the SRO include: general school surveillance, enforcing the school code of conduct and dress code, support on due process, criminal investigation support, coordination with the Child Protective Services (CPS) Division of the Texas Department of Family and Protective Services, truancy follow-up, completing incident reports, and completing Misdemeanor Field Releases (MFRs). In addition to these primary responsibilities, additional duties include working on relationships with the community and providing in-class educational programs.

The SRO was introduced to the faculty and staff as a resource at the school in-service day at the beginning of the school year. In this position's limited tenure at LISD to date, the SRO has made substantial efforts to work with principals and assistant principals on the most critical safety and security issues. The SRO has also made an immediate impact on students regarding the importance of following guidelines set forth in the school code of conduct and dress codes. While it is too early to see a positive impact in the specific incident rate numbers, there is an overwhelming and consistent level of confidence on the part of school administrators that the SRO is making a significant positive impact on the school culture.

In addition to the enforcement and community relations efforts, the SRO has presented a couple of in-class educational sessions related to drinking and driving and texting while driving to high school students. While there are no formal plans for scheduled security and safety education, the SRO has a strong desire to continue such initiatives.

The SRO has also invested in personal training related to active shootings in schools and proper school lockdown procedures. This position brings a wealth of knowledge and best practices in this area that should be used to enhance the quality of the emergency operations plans for LISD.

DETAILED FINDINGS

UPDATE EMERGENCY OPERATIONS PLAN (REC. 69)

LISD has engaged in limited efforts devoted to safety and security planning. A review of safety and security documentation found that although the district had some safety plans and an emergency operations plan, the plans are in need of updating. The latest edition of the LISD Emergency Operations Plan (EOP) was dated May 2005 and did not contain current or accurate information. The review team also noted that there was no evidence of previous threat and vulnerability analyses or other formal means of identifying safety and security concerns.

Texas Education Code (TEC) §37.108 states that each school district shall adopt and implement a multi-hazard EOP for use in district schools. The EOP should address mitigation, preparedness, and response and recovery for

various natural and human-made crises. The EOP must provide for the following:

- district employee training in responding to an emergency;
- mandatory school drills to prepare district students and staff for responding to an emergency;
- measures to ensure coordination with local emergency management agencies, law enforcement agencies, and fire departments in the event of an emergency; and
- the implementation of a security audit as required by TEC §37.108(b).

The district should update outdated safety plans and the emergency operations plan to meet current standards and requirements. The outdated EOP should be revised to meet today's standards and requirements. While the existing EOP has all of the required elements, the document needs to be brought up to date to reflect the current safety and security issues in the district. The process of updating the plans should begin by conducting threat and vulnerability (hazard) analyses or other formal means to identify safety and security concerns. The recently contracted SRO for LISD should be included in the update process for the revised EOP.

The EOP should outline LISD's approach to emergency management and operations. It should provide general guidance for emergency management activities and an overview of LISD's methods of mitigation, preparedness, response, and recovery. The plan should also describe LISD's emergency response organization and assign responsibilities for various emergency tasks. This plan is intended to offer guidance to employees in an emergency and clarify emergency roles and response.

Exhibit 12–4 provides an overview and description of components in an emergency operations plan as provided by the Texas School Safety Center.

Guidance for EOP planning, as well as current EOP checklists and sample plan templates may be downloaded from the Texas School Safety Center (TxSSC) website.

As the role and responsibilities of the SRO evolve, all relevant policies, procedures, and plans should be updated to reflect the new assignments and related tasks. The superintendent should identify and assign ownership of the plans to a staff member to ensure timely implementation.

This recommendation can be implemented with existing resources.

POLICIES AND PROCEDURES (REC. 70)

LISD has limited and outdated documentation of safety and security policies, procedures, and training. Upon examining the safety and security documents submitted by the district, the review team found that LISD lacks comprehensive and updated safety and security policies and procedures. Current policies/manuals include the following:

- Employee Handbook;
- General Safety Programs;
- New Employee Orientation;
- Fleet Driver's Safety Policy;
- Lamesa Success Academy Student Handbook/ Handbook for Teaching Assistants; and
- Student Code of Conduct: Community Relations Conduct on School Premises (1/23/08).

Recommended policies/manuals for districts include the following:

- General School Safety and Security;
- Visitors and Intruders on School Premises;
- Drug Search, Seizure, and Enforcement;
- Weapons on School Premises;
- Use of Force in Schools;
- Active School Shooting/Lockdown; and
- Hazardous Communications.

LISD conducted safety and security audits at the campuses in 2010 as required by Texas Education Code (TEC) §37.108. The primary consistent finding of the 2010 safety audits across the campuses was related to the need for signs to be posted stating that the schools are drug-free/weapons-free/tobacco-free facilities. Further, districts should also have signage policies related to emergency egress. However, the review team noticed a lack of signage regarding these aspects in LISD schools.

Safety and security policies provide authorized guiding principles for decision-making and should be documented. Procedures define the step-by-step tasks to be performed or actions to be taken in accordance with the policies. A process for maintaining safety and security training and drills is a

EXHIBIT 12-4
EMERGENCY OPERATIONS PLAN COMPONENTS

EMERGENCY OPERATIONS PLAN COMPONENT	DESCRIPTION OF COMPONENT
Authority of the EOP	Identify School Board of Trustees, local, state and federal legal authorities that establish the legal basis for planning and carrying out emergency responsibilities.
Purpose of the plan	Describe the reason for development of the plan and identify who the plan applies to.
Explanation of key terms	Explain and/or define terms, acronyms, and abbreviations used in the document.
Situations and assumptions	Include a situation statement that summarizes the potential hazards facing the jurisdiction, including likelihood of occurrence and estimate impacted on school health and safety, and property. Include a list of planning assumptions on which the plan is based.
Concept of operations	Describe the district's overall approach to emergency management. Include a statement acknowledging the adoption of the National Incident Management System (NIMS). Describe district-level incident command arrangements and the interface between district emergency operations and the City and/or County Emergency Operations Center. Outline the process that will be used to obtain state or federal assistance. Summarize emergency authorities of district officials. List actions to be taken by district staff during various phases of emergency management.
Organization and assignment of responsibilities	Describe the district's emergency operations. Describe the emergency responsibilities of the School Board of Trustees, Superintendent, and other members of the executive team. Describe the common emergency management responsibilities of all district departments and safety/security committees. Outline responsibilities for various emergency service functions, summarize the tasks involved, and indicate by title or position the individuals with primary responsibility for each function. Outline the emergency services that community volunteer groups and businesses have agreed to provide.
Direction and control	Indicate by title or position persons responsible for providing guidance for the emergency management program and directing and controlling emergency response and recovery activities. Describe district emergency facilities and summarize the functions performed by each. Summarize the line of succession for key staff.
Readiness levels	Explain readiness levels, indicate who determines them, and describe general actions to be taken at various readiness levels.
Administration and Support	Outline policies on agreements & contracts and refer to summary of current emergency service agreements and contracts in appendices Establish requirements for reports required during emergency operations. Outline requirements for record-keeping related to emergencies and for preservation of government records. Describe the policies on training for staff to ensure compliance with National Incident Management System (NIMS) requirements. Establish requirements for a post-event review of emergency operations following major district emergencies and disasters.
Plan development and maintenance	Identify who is responsible for approving and promulgating the plan and indicate how it will be distributed. Outline the process and schedule for review and update the plan.

necessary component for providing a safe and secure environment for students and staff.

LISD should update safety and security policies and procedures. As part of the update, the district should continue to schedule safety and security audits every three years as required by Texas Education Code, §37.108. In addition, LISD should implement a formal process of frequent playground inspections. Monthly or quarterly maintenance inspections should be conducted. Further, more comprehensive playground checks should be completed at least annually to include, at a minimum, inspection of the following:

- protective surfacing;

- fall zones;
- protrusion and entanglement hazards;
- entrapment openings;
- sufficient equipment spacing;
- trip hazards;
- pinch, crush, shearing, and sharp edge hazards;
- platform guardrails; and
- equipment not suitable for the public.

More details regarding playground safety can be obtained from the National Playground Safety Institute (NPSI).

As another component of updating safety and security policies and procedures, a process for maintaining safety and security training and drills should be implemented. Furthermore, LISD should undertake a careful review of signage policies related to school safety, drug-free/weapons-free environments, and emergency egress. Finally, the district must establish a process to implement the safety and security recommendations resulting from the 2010 safety and security audit.

The fiscal impact for this recommendation assumes that the district has already established a budget to implement the recommendations from the 2010 safety and security audit. Therefore, installing adequate signage in all schools can be accomplished with existing resources.

SECURITY EQUIPMENT AND PROGRAM UPGRADES (REC. 71)

While LISD has closed-circuit television (CCTV) cameras in place at most schools, the district lacks adequate coverage at all campuses. The use of CCTV cameras at the LISD campuses has been very useful in incident and criminal investigations. The recordings have proved very useful to the SRO in evaluating evidence and fairly reprimanding students involved in code of conduct breaches and fighting. While the coverage of the CCTV cameras is reasonable, there are many important areas not covered by the current cameras.

A vast number of exterior doors at the high school lack CCTV camera coverage, as well as some key busy assembly areas both within and around the schools. CCTV cameras should generally be placed near entrances, hallways, stairwells, common areas, and parking lots that are monitored 24 hours a day, 7 days a week.

Many school districts agree that installing video surveillance equipment helps students focus on their studies, instead of outside violence. CCTV cameras also provide many benefits to district administration and staff. These include:

- the cameras provide school officials and the SRO with information and evidence that is not otherwise available;
- the cameras deter crime and may lead some students to confess to infractions that were not even caught on the security cameras;
- the cameras allow the SRO to do more education and training, while allowing the mundane watch tasks to be performed by the security system; and
- money is also saved from insurance premiums by the reduced burglaries and vandalism.

LISD should conduct a cost benefit analysis of investing in additional closed-circuit television (CCTV) cameras to increase coverage in the district. In addition, the district should conduct a detailed inventory and assessment prior to purchasing and installing additional equipment. LISD school officials must weigh the benefits and costs of the CCTV camera coverage. While installing video surveillance cameras in schools can be a large expense, these cameras have been proven to be effective in deterring theft, fighting, vandalism and property damage, gang activity, and entry onto school property by unauthorized strangers.

If LISD does decide to purchase additional video surveillance systems for the schools, adequate research and planning should be conducted in order to make the new system as effective as possible. Once the additional security systems are installed, school officials should evaluate their effectiveness at set times and adapt to future security challenges and students' needs. No fiscal impact is assumed for this recommendation until the completion of the cost/benefit analysis, detailed inventory and assessment is conducted and evaluated.

VISITOR SIGN-IN PROCEDURES (REC. 72)

LISD lacks effective and consistent visitor controls and school access procedures at all campuses. Although testing of new visitor management systems for visitor sign-in was underway at the time of onsite work, the review team found that LISD had varied and informal visitor controls and minimally effective school access procedures at most campuses. There are varying policies and procedures at each school, which are not consistently followed. Most of the elementary schools had visitor sign in and temporary badge

procedures. While the Middle School and High school had similar procedures, access to the main administrative offices was more remote from the main entrances. This made the control and monitoring of visitors much more difficult.

While the review team found that South Elementary School had exceptional signage on many interior doors of the building with clear directions, most campuses lacked adequate visitor instructions and directional signs. Additionally, the age of the buildings and ineffective entrance/office space configuration for security design adds to the difficulty of providing adequate visitor controls.

Making visitors to schools feel welcomed and comfortable while maintaining adequate security control is essential. The Indiana Insurance Company provides information on effective safety and security procedures in schools and identified four key elements to an effective visitor management system. These elements are highlighted in their publication "Practical Safety and Security Visitor Controls" and include the following:

- providing dedicated and visible visitor parking;
- implementing effective access control;
- registering visitor identification; and
- training staff and maintaining control.

DEDICATED VISITOR PARKING AREA

Dedicated visitor parking areas should be provided that are separate from student and staff parking. Signs should be posted along the school entry drive providing clear directions to the designated visitor parking area. Each parking space should be clearly marked with a "Visitor Parking Only" sign. This approach helps to identify the presence of visitors at the school with a quick glance. It may also help spot unwanted vehicles cruising through the parking lot seeking theft or vandalism opportunities of student or staff vehicles.

It is helpful if the visitor parking area is in clear view of the main administration office or school reception area. This enables office staff to monitor the school grounds and quickly identify visitors approaching the school building. Signs posted in the visitor parking area may also be the first opportunity to give clear directions to the main entry doors and instructions that all visitors must report to the main office.

ACCESS CONTROL

The number of public entrances to the school should be limited to help control visitor access. All other doors besides the main public entrance should be locked. Again, the visitor entrance should, if at all possible, be limited to a single door that is observable from the main office. In newer school designs, entry foyers may be designated to prevent visitors from entering the building without first going to or through the main office. Unfortunately, most of the schools in LISD were constructed prior to these security design practices.

Visitor instructions and direction signs should be posted in clear view on every exterior door. These signs should inform visitors that they must report to the main office and provide directions to the visitor entrance.

VISITOR IDENTIFICATION

Once at the main office, each visitor should be required to show a photo ID and sign in to a visitor log. The log should include the date, visitor name, address, reason for visit, time in and time out. Recording the visitor's vehicle license plate number is also desirable. The visitor's name and address as shown on their ID should be verified against the sign-in log. Districts typically inform the visitors that a visitor management system is a precaution you take to ensure the safety of their children. Districts must train teachers and staff how to use the system, so they can fully understand the procedure.

Unique and colorful visitor identification badges should be used for all visitors, including vendors and contractors. The visitor ID badges should be stored in a secure place and never left on a counter top. It is desirable to use ID badges that expire with age or have a large, clearly visible expiration date and time. There are visitor management systems available that check against public sex offender databases.

With a visitor management system, it is equally important to know when visitors enter and exit school buildings. The district should require visitors to return the ID badge and sign out after their visit is complete. Administrative staff should be trained to verify that every visitor has signed out at the end of each day. Consideration may also be given to requiring visitors to leave their photo ID with the main office until their school visitor ID badge is returned.

TRAINING AND MAINTAINING CONTROL

Administrative or Central Office staff should question all visitors as to the reason for their visit. In some cases, school administrators may want to consider requiring that visitors

be escorted in the school by an employee. This method ensures that everyone in the building is accounted for. Staff and students can also be trained to direct all visitors to the main office and report anyone attempting to travel through a school without a visitor's ID badge. They should also be taught not to open locked doors for unescorted visitors once the school has been secured for the school day.

The district should train school staff and students to be confident in the use of a "friendly challenge" for persons without proper school ID or visitor ID. This task may be as simple as asking if the visitor needs help or directions and then escorting them to the main office or handing them off to a teacher or other staff member. If the visitor acts suspiciously or becomes uncooperative, staff/students should contact the Central Office or SRO immediately. Training of all school staff to look for unusual items, unknown or suspicious persons, and to recognize signs of agitated behavior or exhibits of threatening behavior should also be conducted.

Making visitors to LISD schools feel welcomed and comfortable while maintaining security and safety is easy if these protocols are followed. Creating an environment where everyone knows who belongs in the school and who may be an unwelcomed intruder is common sense. LISD should finalize and make consistent the varying systems for teacher and visitor sign-in.

The fiscal impact associated with this recommendation assumes a cost for installing parking and directional signage at all campuses. Based on a preliminary evaluation, the cost to install parking signage at the visitor spaces and directional signage to the main entrance and on the exterior doors at the schools is about $2,500.

SAFETY AND SECURITY TRAINING BUDGET (REC. 73)

LISD has no specific budget for security or safety training and limited self-funded training by the School Resource Officer (SRO) to meet minimum training requirements. There could be a significant return on investment from a formal strategic training program and integration into the overall security planning process.

LISD has not budgeted for the minimum training needs of the SRO, leaving the district at risk. Similarly, there is a limited budget and lack of a formal plan devoted to providing safety and security training to school administrators, staff, teachers, and students. Training school administrators, teachers, and support staff on school violence prevention, school crime prevention practices, school security procedures and awareness, and school emergency planning best practices is a recommended practice. The first and best line of defense to minimize school safety and security incidents is a well-trained, highly alert school staff and student body. The school district should provide resources and training to educate employees, students, and the community about school safety, security, and emergency management programs.

The Texas Occupational Code requires 40 hours of approved training within a 24-month cycle for law enforcement officers. The Texas Commission on Law Enforcement Standards and Education (TCLEOSE) has identified a four-year training cycle from 2009 to 2013. This four-year cycle has been broken down into two 24-month training units for the purposes of the required course offerings. In addition, a law enforcement agency must have its officers demonstrate firearms proficiency on an annual basis. The successful completion of the requirements must be documented and kept on file.

While much of the mandatory training is most likely covered by the LPD, there should be some sharing of training requirements and funding for school-specific opportunities. The SRO has already completed some essential training regarding active shooting in schools. Other valuable training opportunities to consider include: Crisis Intervention Training (CIT), Child Abuse Prevention and Investigation, Crime Scene Investigation, Use of Force in Schools, Arrest Search and Seizure, Spanish for Law Enforcement, Racial Profiling, Incident Command Systems (ICS), and National Incident Management System (NIMS).

A good source for identifying training and networking opportunities to share best practices is the National Association of School Resource Officers (NASRO). NASRO is a not-for-profit organization for school-based law enforcement officers, school administrators, and school security/safety professionals. There is also a Texas Association of School Resource Officers (TASRO). Both NASRO and TASRO provide training courses, conferences, and peer-to-peer idea sharing opportunities. Some of NASRO's educational offerings include the following:

- basic SRO;
- SRO supervisors and management;
- advanced SRO;
- SRO active shooter response;
- interview and interrogation techniques for the SRO; and

- school law update.

The Basic SRO course emphasizes three main areas of instruction: functioning as a police officer in the school setting, working as a resource and problem solver, and the development of teaching skills. This training focuses on developing a working knowledge of the SRO concept and how to establish a lasting partnership with the schools. The SRO Supervisors and Management course was designed for police supervisors and school administrators who have the responsibility of implementing, supervising, managing, and evaluating an SRO program and/or school resource officers. The goal is to provide managers with information, skills, and strategies to develop, coordinate, and maintain a successful SRO program in their school community. The Advanced School Resource Officer Course provides additional skills and programs for the experienced SRO to identify and diffuse potentially dangerous situations on school premises. Finally, the National School Law Update has been designed to address subjects such as search and seizure, student interviews, custody issues, sexual harassment, and civil liability.

In addition to the SRO training described above, emergency management staff with a critical role in emergency response should complete training related to the emergency operations plan (EOP). More specifically, anyone in LISD who has a role in the EOP should receive training on Incident Command Systems (ICS) and the National Incident Management System (NIMS). Features of the ICS include the following:

- standardized, on-scene, all hazard incident management approach based on best practices;
- based on a common framework to provide flexible and scalable response methods that enables emergency staff the ability to work together effectively; and
- designed to provide a standard systematic response and operating procedures to minimize problems and the potential for miscommunication.

The NIMS is a standardized system used throughout the U.S. to coordinate emergency preparedness and incident management among various local, state, and federal agencies. The NIMS provides a consistent framework within which government agencies can work together to most effectively manage emergencies and mandates the use of ICS. Any school district requesting emergency preparedness funding from the federal government is required to be in compliance with NIMS implementation activities and work in close coordination with designated members of their local government.

LISD should establish a specific budget for security and safety training. The district should create a training plan and budget based on the state requirements for officers and on LISD goals for its SRO. The formal strategic training program should be integrated into the overall security planning process with help from the SRO. LISD should coordinate training needs and funding requirements for the SRO specifically with the Lamesa Police Department (LPD).

The SRO should work with the assistant superintendent of Personnel to ensure that minimum state-required training and any additional LISD-specific training can be accomplished in a timely fashion. An additional budget of $1,500 per year would be required for SRO training specific to LISD needs.

ENHANCED SCHOOL RESOURCE OFFICER SUPPORT (REC. 74)

LISD lacks a plan for coordinating safety and security programs with the School Resource Officer (SRO). As previously mentioned, LISD hired an SRO to support safety and security efforts at all campuses across the district in school year 2010–11. During interviews with administrators and staff, the review team found that although informal discussions were in progress regarding the SRO's duties in the district, a formal plan coordinating the SRO's duties with safety and security programs in the district did not exist. District staff suggested that they were feeling their way through the SRO's first year to see what worked best.

School districts may use SROs in a combination of ways. SRO activities often include: school monitoring, enforcement of policies (e.g., anti-bullying and Positive Behavior Support), incident review and documentation, student counseling, and training.

The hiring of an SRO this past year creates a unique opportunity for LISD to improve the school environment from a safety and security standpoint. The district should enhance the current safety and security programs.

Recommended enhancements could include using the SRO to support the following:

- additional classroom safety education programs (e.g., safe driving, DWI education, dangers of texting while driving, drug-free schools);
- anti-bullying educational programs;

- Positive Behavior Support (PBS) programs;
- student mediator programs; and
- initiation and monitoring of anonymous tip lines.

ADDITIONAL CLASSROOM SAFETY TRAINING

In the short time the SRO has been at the schools, the SRO for LISD has provided a limited amount of in-class education regarding safe driving techniques and the dangers of driving while under the influence of alcohol. Based on interviews, the SRO has the interest, passion, and capabilities for delivering valuable training to teachers and students. The SRO brings both knowledge and authority to the classroom that could prove beneficial when it comes to enhancing the safety and security through training on key topics. Combined with the additional recommended training, there may be some opportunities to enhance the current training program. LISD should consider allotting additional time for the SRO to be in front of students by providing safety training in the classrooms.

ANTI-BULLYING PROGRAMS

During the review team site visit, parents and students reported cases of bullying in the schools. Bullying is currently an emotionally charged issue fueled by many groups searching for solutions. A focus has been placed on the prevention of bullying in schools through the implementation of policy to create formalized anti-bullying strategies for school districts. Many school districts across the country are already doing the necessary things to prevent bullying but fail to recognize how these individual strategies collectively fit together as an anti-bullying program. LISD could enhance the school learning environment by providing a culture of respect in the schools.

A culture of respect includes "shame free zones" in which daily teasing and bullying is not accepted. They provide environments in which teachers and administrators pay attention to students' social and emotional needs as well as their academic needs. Such environments emphasize emotional intelligence where students experience a sense of emotional fit and respect within the student body. When this occurs, they are much less likely to engage in or be victimized by bullying or other harmful behaviors.

In many schools there is a concern that telling a teacher or school administrator that other students may cause harm violates an unwritten, but powerful, code of silence. The SRO reported that this was evident in the LISD schools. Such an environment has the potentially damaging effect of causing students to feel that they need to handle problems themselves, without the aid of adult support. In a climate of safety, students have a positive connection with at least one school administrator (including teachers, counselors, coaches, secretaries, SROs, principals and assistant principals, even secretaries). They are willing and able to seek guidance and talk about concerns without fear of reprisal.

The major components in creating a safe school environment through the introduction of anti-bullying programs include the following:

- assessment of the school's emotional climate;
- emphasis on the importance of listening in schools;
- adoption of a strong but caring stance against the code of silence;
- prevention of, and intervention in the case of, bullying;
- involvement of all members of the community;
- development of trusting relationships between students and school staff; and
- creation of mechanisms for sustaining safe school environments.

A valuable resource for the development of anti-bullying programs in schools is the U.S. Department of Education's publication *Threat Assessment in Schools: A Guide to Managing Threatening Situations and Creating Safe School Climates* (U.S. DOE, 2002).

POSITIVE BEHAVIOR SUPPORT (PBS) PROGRAMS

LISD has adopted Positive Behavior Support (PBS), but implementation is inconsistent across the district and driven more by school leadership than strategic mission. For example, PBS efforts are strong in the middle school. However, there are opportunities across the other campuses to reduce behavioral incidents in schools. PBS provides emphasis on schoolwide systems that support appropriate student behaviors that create positive school environments. Instead of using a piecemeal approach of individual behavioral management plans, a continuum of positive behavior support for all students is implemented in classroom and non-classroom settings.

LISD should enhance the current safety and security programs. The district should continue to expand its efforts

in implementing PBS on a schoolwide (SW) basis. The SRO can support this effort through enhanced enforcement of the school code of conduct and dress code, as well as further support of the anti-bullying programs. The SRO has expressed an interest in providing more in-class educational sessions for both teachers and students. SWPBS is not a packaged curriculum but an approach that defines core elements that can be achieved through a variety of strategies. Attention is focused on creating and sustaining primary (schoolwide), secondary (classroom), and tertiary (individual) systems of support for all children by making desired behavior more functional. The core elements at each of the three tiers in the SWPBS prevention model are defined in **Exhibit 12–5**.

The core elements of SWPBS should be integrated within the LISD organizational systems with the SRO, working with administrators and behavior specialists to provide the training, policy, and organizational support.

EXHIBIT 12-5
SCHOOLWIDE POSITIVE BEHAVIOR SUPPORT

PREVENTION TIER	CORE ELEMENTS
Primary	Behavioral expectations defined
	Behavioral expectations taught
	Reward system for appropriate behavior
	Continuum of consequences for problem behavior
	Continuous collection and use of data for decision-making
Secondary	Universal screening
	Progress monitoring for at-risk students
	System for increasing structure and predictability
	System for increasing contingent adult feedback
	System for linking academic and behavioral performance
	System for increasing home/school communication
	Collection and use of data for decision-making
Tertiary	Functional behavioral assessment
	Team-based comprehensive assessment
	Linking of academic and behavior supports
	Individualized intervention based on assessment information focusing on (a) prevention of problem contexts, (b) instruction on functionally equivalent skills and instruction on desired performance skills, (c) strategies for placing problem behavior on extinction, (d) strategies for enhancing contingence reward of desired behavior, and (e) use of negative or safety consequences if needed.
	Collection and use of data for decision-making

SOURCE: Horner, R., Sugai, G., Smolkowski, K., Todd, A., Nakasato, J., & Esperanza, J., (in press). A Randomized Control Trial of School-wide Positive Behavior Support in Elementary Schools. Journal of Positive Behavior Interventions.

STUDENT MEDIATOR PROGRAMS

Violence in schools, especially high schools, has been a concern across the country. The violence may escalate from minor events where student intervention could have helped to diffuse the situation. For this reason, student mediation programs have grown in popularity in an effort to resolve conflicts and help students become vocal leaders against school violence. Students trained in conflict resolution techniques can help classmates resolve conflicts non-violently and encourage safe school environments. Student mediation programs can help improve school environments, build positive relationships among students and teachers, and, ultimately, enhance student learning potential.

The LISD campuses reported over 1,000 violations of the school code of conduct and over 100 incidents of fighting in the past year. Based on discussions with the SRO, many of these violations could be reduced through better use of student mediators.

George Mason University's Institute for Conflict Analysis and Resolution (ICAR) has been a leader in this area. ICAR promotes a five-step approach to implementing peer mediation programs:

1. Choose the right students for mediation.
2. Get help from experts.
3. Train nominated student leaders.
4. Implement the program.
5. Evaluate the success.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2011–12	2012–13	2013–14	2014–15	2015–16	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 12: SAFETY AND SECURITY							
69. Update outdated safety plans and the emergency operations plan to meet current standards and requirements.	$0	$0	$0	$0	$0	$0	$0
70. Update safety and security policies and procedures.	$0	$0	$0	$0	$0	$0	$0
71. Conduct a cost benefit analysis of investing in additional closed-circuit television (CCTV) cameras to increase coverage in the district.	$0	$0	$0	$0	$0	$0	$0
72. Finalize and make consistent the varying systems for teacher and visitor sign-in.	$0	$0	$0	$0	$0	$0	($2,500)
73. Establish a specific budget for security and safety training.	($1,500)	($1,500)	($1,500)	($1,500)	($1,500)	($7,500)	$0
74. Enhance the current safety and security programs.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 12	**($1,500)**	**($1,500)**	**($1,500)**	**($1,500)**	**($1,500)**	**($7,500)**	**($2,500)**